

**INITIAL TITLE V AIR PERMIT APPLICATION REVIEW
(INCLUDING INCORPORATION OF THE PHASE II ACID RAIN PERMIT INTO THE
TITLE V PERMIT)**

APPLICANT:	SITE LOCATION:	COUNTY:	
Duke Energy Corporation Riverbend Steam Station	Mount Holly	Gaston	
TECHNICAL CONTACT:	PHONE:	RESPONSIBLE OFFICIAL:	TITLE:
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REGIONAL CONTACT:	REGIONAL OFFICE:	SIC CODE:	
Denise Fogleman	MRO	4911	
APPLICATION NUMBERS :	EXISTING PERMIT NUMBERS :	NEW PERMIT NUMBER:	
360040A5.A	03788R21, Acid Rain Permit 360040R02	03788T22	

I. Introduction

The U.S. Environmental Protection Agency (EPA) has given interim approval to North Carolina's Title V operating permits program effective on December 15, 1995. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality (DAQ). Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This Initial Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

II. Background Information

The DRAFT Title V operating permit replaces an existing Air Quality Construction and Operation Permit No. 03788R21, which was issued on January 11, 2002 and is currently scheduled to expire on December 31, 2006. Also, the Title V permit will incorporate the Phase II acid rain permit requirements as a combined Title V/Title IV permit and replace the existing Phase II Acid Rain Permit No. 360040R02, which was issued by the DAQ on

November 20, 2002 and is currently scheduled to expire on December 31, 2007.

Pursuant to 15A NCAC 2Q .0506, Duke Energy submitted its initial Title V application to the DAQ on August 12, 1996. The application was considered complete for processing on October 8, 1996. The DRAFT permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

This facility operates under SIC code 4911.

III. Facility Description

Duke Energy's Riverbend Steam Station is an electric utility that generates electrical power using boilers and combustion turbines. The Riverbend facility has two coal/No. 2 fuel oil/low-level PCB-contaminated mineral oil-fired electric utility boilers (ES-1 and ES-2), two coal/No. 2 fuel oil-fired boilers (ES-3 and ES-4), four No. 2 fuel oil/natural gas-fired simple-cycle internal combustion turbines (ES-5, ES-6, ES-7 and ES-8), one No. 2 fuel oil-fired auxiliary boiler (ES-9), two NSPS coal crushers (CRA and CRB) and two NSPS coal conveyors (CB1 and CB2).

IV. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on its latest inspection, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is being issued.

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
ES-1 (U4, Boiler 7)	one coal/No. 2 fuel oil/low-level PCB-contaminated mineral oil-fired electric utility boiler (1270 million Btu per hour heat input) (Unit No. 4 - Boiler No. 7)	CD-1(U4lnb) CD-1a(U4SOFA) CD-2(U4esp)	one low-NO _x concentric firing system* separated overfire air (SOFA) low-NO _x control equipment* one hot-side electrostatic precipitator (136,080 square feet of plate area)
ES-2 (U5, Boiler 8)	one coal/No. 2 fuel oil/low-level PCB-contaminated mineral oil-fired electric utility boiler (1270 million Btu per hour heat input) (Unit No. 5 - Boiler No. 8)	CD-3(U5lnb) CD-4(U5esp)	one low-NO _x concentric firing system* one hot-side electrostatic precipitator (136,080 square feet of plate area)
ES-3 (U6, Boiler 9)	one coal/No. 2 fuel oil-fired electric utility boiler (1590 million Btu per hour heat input) (Unit No. 6 - Boiler No. 9)	CD-5(U6lnb) CD-6(U6esp)	one low-NO _x concentric firing system* one hot-side electrostatic precipitator (158,760 square feet of plate area)
ES-4 (U7, Boiler 10)	one coal/No. 2 fuel oil-fired electric utility boiler (1590 million Btu per hour heat input) (Unit No. 7 - Boiler No. 10)	CD-7(U7lnb) CD-8(U7esp)	one low-NO _x concentric firing system* one hot-side electrostatic precipitator (158,760 square feet of plate area)
ES-5(CT1) ES-6(CT2) ES-7(CT3) ES-8(CT4)	four No. 2 fuel oil/natural gas-fired simple-cycle internal combustion turbines (775 million Btu per hour heat input each) (Units Nos. 8C, 9C, 10C, and 11C)	None	NA
ES-9(Aux)	one No. 2 fuel oil-fired auxiliary boiler (11.8 million Btu per hour heat input)	None	NA
CRA and CRB NSPS	two coal crushers (625 tons per hour maximum rated capacity each)	None	NA
CB1 and CB2 NSPS	two coal conveyors (1250 tons per hour maximum rated capacity each)	None	NA

* The low-NO_x control systems may be operated independently of each other or in combination. Each system may be operated intermittently as necessary, based on boiler system requirements, to maintain compliance with applicable emission standards.

VI. Emission Source-by-Source Evaluation

- A. **one coal/No. 2 fuel oil/low-level PCB-contaminated mineral oil-fired electric utility boiler (ID No. ES-1(U4, Boiler 7)) with a low-NO_x concentric firing system (ID No. CD-1(U4lnb)) and separated overfire air (SOFA) low-NO_x control equipment (ID No. CD-1a(U4SOFA)) and associated electrostatic precipitator (ID No. CD-2(U4esp)),**

one coal/No. 2 fuel oil/low-level PCB-contaminated mineral oil-fired electric utility boiler (ID No. ES-2(U5, Boiler 8)) with a low-NO_x concentric firing system (ID No. CD-3(U5lnb)) and associated electrostatic precipitator (ID No. CD-4(U5esp)),

one coal/No. 2 fuel oil-fired electric utility boiler (ID No. ES-3(U6, Boiler 9)) with a low-NO_x concentric firing system (ID Nos. CD-5(U6lnb)) and associated electrostatic precipitator (ID Nos. CD-6(U6esp)), and

one coal/No. 2 fuel oil-fired electric utility boiler (ID No. ES-4(U7, Boiler 10)) with a low-NO_x concentric firing system (ID No. CD-7(U7lnb)) and associated electrostatic precipitator (ID No. CD-8(U7esp))

1. Description

Boiler No. 7 (ID No. ES-1) and Boiler No. 8 (ID No. ES-2) are tangentially-fired, dry-bottom boilers with a maximum heat input of 1270 million Btu per hour each and began operation in 1950. Boiler No. 9 (ID No. ES-3) and Boiler No. 10 (ID No. ES-4) are tangentially-fired, dry-bottom boilers with a maximum heat input of 1590 million Btu per hour each and began operation in 1952. These boilers fire coal as primary fuel, with No.2 fuel oil used for start-up and flame stabilization. Also, low-level PCB-contaminated mineral oil is allowed to be burned subject to the conditions and stipulations in the permit.

2. Applicable Regulatory Requirements

The following provides a summary of emission and/or operation limits for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
	Phase II Acid Rain Permit Requirements (see Section VII)	15A NCAC 2Q .0402 (40 CFR Part 72)
nitrogen oxides	when burning only coal 1.8 pounds per million Btu heat input	15A NCAC 2D .0519
	when burning only oil 0.8 pounds per million Btu heat input	
	when burning both coal and oil $E = [(E_c)(Q_c) + (E_o)(Q_o)]/Q_t$ where: E = emission limit for combined burning of coal and oil in pounds per million Btu heat input E _c = 1.8 pounds per million Btu heat input for coal only E _o = 0.8 pounds per million Btu heat input for oil Q _c = coal heat input in Btu per hour Q _o = oil heat input in Btu per hour Q _t = Q _c + Q _o	
	Phase II Acid Rain Permit Requirements (see Section VII)	15A NCAC 2Q .0402 (40 CFR Part 72)
	varies - see Section VI.A.2.h	15A NCAC 2D .1416
Regulated Pollutant	Limits/Standards	Applicable Regulation
visible emissions	Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule for sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), the following limits apply: 40 percent opacity (except during startups) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.	40 CFR 52 Subpart II

	<p>State-only requirement 40 percent opacity (excluding startups, shutdowns, maintenance periods when fuel is not being combusted, and malfunctions approved as such according to procedures approved under 15A NCAC 2D .0535) when averaged over a six-minute period except that: (1) no more than 10 six-minute periods shall exceed the opacity standard in any one day; and (2) the percent of excess emissions (defined as percentage of monitored operating time in a calendar quarter above the opacity limit) shall not exceed 0.8 percent of the total operating hours.</p>	15A NCAC 2D .0521
	<p>If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule for sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), the following limit applies beginning on the date the final rule is published in the Federal Register:</p> <p>40 percent opacity (excluding startups, shutdowns, maintenance periods when fuel is not being combusted, and malfunctions approved as such according to procedures approved under 15A NCAC 2D .0535) when averaged over a six-minute period except that: (1) no more than 10 six-minute periods shall exceed the opacity standard in any one day; and (2) the percent of excess emissions (defined as percentage of monitored operating time in a calendar quarter above the opacity limit) shall not exceed 0.8 percent of the total operating hours.</p>	15A NCAC 2D .0521
	<p>State-only requirement 12 percent annual average opacity</p>	15A NCAC 2D .0536
particulate matter	0.12 pounds per million Btu heat input	15A NCAC 2D .0536
malfunction abatement plan	as defined in specific conditions	15A NCAC 2D .0535
good operations and maintenance practices	as defined in specific conditions	15A NCAC 2D .0606

a. 2D .0516 "Sulfur Dioxide Emissions From Combustion Sources"

i. Regulatory Analysis

Sulfur dioxide emissions from any source of combustion that is discharged from any vent, stack, or chimney shall not exceed 2.3 pounds per million Btu heat input. This is calculated on a 24-hour (daily) block averaging period basis. There are no control devices to control emissions of sulfur dioxide.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall demonstrate compliance with 2D .0516 using a continuous

emissions monitoring (CEM) system meeting the requirements of 40 CFR Part 75. Sulfur dioxide emissions shall be determined by averaging hourly continuous emission monitoring system values over a 24-hour block period beginning at midnight. Compliance is defined as not exceeding 2.3 pounds per million Btu heat input for any 24-hour block averaging period.

iii. Reporting Requirements

The Permittee shall submit no later than 30 days following the end of the quarter the continuous emissions monitoring data showing the 24-hour daily block values in pounds per million Btu for each 24-hour daily block averaging period during the reporting period.

b. 2D .0519 "Control of Nitrogen Dioxide and Nitrogen Oxides Emissions"

i. Regulatory Analysis

The emission limit of nitrogen oxides for a boiler that burns both coal and oil or gas in combination, shall be calculated by the following equation:

$$E = [(Ec)(Qc) + (Eo)(Qo)]/Qt$$

where: E = emission limit for combined burning of coal and oil in pounds per million Btu heat input
Ec = 1.8 pounds per million Btu heat input for coal only
Eo = 0.8 pounds per million Btu heat input for oil or gas only
Qc = coal heat input in Btu per hour
Qo = oil or gas heat input in Btu per hour
Qt = Qc + Qo.

Duke Energy states that they do not expect to burn any of the permitted oils (except during startup or flame stabilization) above a rate greater than 70 percent of the total heat input; and request that a limit of 1.1 pounds per million Btu be placed in the permit, based on a worst-case oil burn rate of 70 percent, for all oil burn rates (except during startup or flame stabilization) below 70 percent to avoid the complexity of determining heat rates at various burn rates for monitoring and recordkeeping purposes. Therefore, nitrogen oxide emissions shall not exceed the following, calculated on a 24-hour (daily) block averaging period basis:

- (A) 1.8 pounds per million Btu heat input when burning only coal.
- (B) 0.8 pounds per million Btu heat input when burning only oil (fuel oil or polychlorinated biphenyl (PCB)-contaminated mineral oil)

(C) 1.1 pounds per million Btu heat input when burning both coal and oil (fuel oil or polychlorinated biphenyl (PCB)-contaminated mineral oil), for other than startup, when the oil burn rate is less than 70 percent of the total heat input ($Q_o/Q_t < 70\%$), corresponding to no more than 70 percent of total heat input being from oil.

ii. Monitoring/Recordkeeping Requirements

To demonstrate compliance with 15A NCAC 2D .0519, nitrogen oxide emissions in pounds per million Btu shall be determined using a continuous emissions monitoring (CEM) system meeting the requirements of 40 CFR Part 75. The Permittee shall maintain records of coal and oil consumption to document the emission rate and provide such records upon request to the DAQ.

iii. Reporting Requirements

The Permittee shall report no later than 30 days after the end of each semi-annual period the continuous emissions monitoring system data for periods of excess nitrogen oxide emissions showing the 24-hour daily block values for each 24-hour block averaging period during the reporting period.

c. 40 CFR 52 Subpart II "North Carolina State Implementation Plan"

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule for sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), the following limit applies:

i. Regulatory Analysis

Visible emissions from these sources shall not be more than 40 percent opacity (except during startups) when averaged over a six-minute period except that six-minute periods averaging not more than 90 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. This regulation is the "old" 2D .0521, which was replaced by the current 2D .0521 at the state level on April 1, 2001, and remains the only approved opacity rule at the federal level.

ii. Monitoring/Recordkeeping Requirements

To assure compliance the Permittee shall determine the opacity using a continuous opacity monitor system (COMS) meeting the requirements of 15A NCAC 2D .0536(g). Compliance with 40 CFR 52 Subpart II shall be determined using six-minute averages of the COMS values.

iii. Reporting Requirements

The COMS excess emissions data shall be reported no later than 30 days after the end of the quarter as specified in Section VI.A.2.g.iii.

(State-only requirement)

d. 2D .0521 "Control Of Visible Emissions"

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule for sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), the following limit applies:

i. Regulatory Analysis

For sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), compliance with the 40 percent opacity limit shall be determined as follows: excluding startups, shutdowns, maintenance periods when fuel is not being combusted, and malfunctions approved as such according to procedures approved under 15A NCAC 2D .0535: (1) no more than 10 six-minute periods shall exceed the opacity standard in any one day; and (2) the percent of excess emissions (defined as percentage of monitored operating time in a calendar quarter above the opacity limit) shall not exceed 0.8 percent of the total operating hours. If a source operates less than 500 hours during a calendar quarter, the percent of excess emissions shall be calculated by including hours operated immediately previous to this quarter until 500 operational hours are obtained.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall determine the opacity using a continuous opacity monitor system (COMS) meeting the requirements of 15A NCAC 2D .0536(g). Compliance with 15A NCAC 2D .0521 shall be determined using six-minute averages of the COMS values.

iii. Reporting Requirements

The COMS excess emissions data shall be reported no later than 30 days after the end of the quarter as specified in Section VI.A.2.h.iii.

e. 2D .0521 "Control Of Visible Emissions"

If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule for sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), the following limit applies beginning on the date the final rule is published in the Federal Register:

i. Regulatory Analysis

For sources required to install, operate, and maintain continuous opacity monitoring systems (COMs), compliance with the 40 percent opacity limit shall be determined as follows: excluding startups, shutdowns, maintenance periods when fuel is not being combusted, and malfunctions approved as such according to procedures approved under 15A NCAC 2D .0535: (1) no more than 10 six-minute periods shall exceed the opacity standard in any one day; and (2) the percent of excess emissions (defined as percentage of monitored operating time in a calendar quarter above the opacity limit) shall not exceed 0.8 percent of the total operating hours. If a source operates less than 500 hours during a calendar quarter, the percent of excess emissions shall be calculated by including hours operated immediately previous to this quarter until 500 operational hours are obtained.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall determine the opacity using a continuous opacity monitor system (COMS) meeting the requirements of 15A NCAC 2D .0536(g). Compliance with 15A NCAC 2D .0521 shall be determined using six-minute averages of the COMS values.

iii. Reporting Requirements

The COMS excess emissions data shall be reported no later than 30 days after the end of the quarter as specified in Section VI.A.2.h.iii.

f. 2D .0536 "Particulate Emissions From Electric Utility Boilers"

i. Regulatory Analysis

Emissions of particulate matter from these boilers shall not exceed 0.12 pounds per million Btu heat input.

Emissions of particulate matter are controlled by the electrostatic precipitators (ESPs). The Permittee shall obtain an air permit before installing Energy Management System (EMS) capability.

ii. Testing/Monitoring/Recordkeeping Requirements

A stack test shall be conducted in accordance with Method 5 or Method 17 of Appendix A of 40 CFR Part 60 once per calendar year. In the event that a unit exceeds 80 percent of its particulate emission limit during the stack test, the

Permittee will schedule and conduct another stack test within 6 months. Upon demonstration that the source is operating under 80 percent of its particulate limit, as shown by three consecutive semiannual stack tests, the source may resume annual stack tests. Testing requirements are specified in 2D .0501(c).

iii. Reporting Requirements

The results of any stack test shall be reported within 30 days, and the test report shall be submitted within 60 days after the test.

(State-only requirements)

iv. Regulatory Analysis

The following requirements under 2D .0536 are state-enforceable only since the maximum annual average opacities under this rule have not been approved by EPA.

Visible emissions from these boilers shall not exceed an average annual opacity (AAO) of 12 percent.

v. Reporting Requirements

The Permittee shall submit a report by the 30th day following the end of each month showing, for each day of the previous month, the calculated annual average opacity of each unit and the annual average opacity limit.

g. 2D .0535 "Excess Emissions Reporting and Malfunctions"

i. Regulatory Analysis

All electric utility boiler units shall have a malfunction abatement plan approved by the Director.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall maintain logs to show that the operation and maintenance parts of the malfunction abatement plan are implemented. These logs shall be subject to inspection by DAQ personnel upon request during business hours.

h. 2D .0606 "Sources Covered By Appendix P of 40 CFR Part 51"

i. Regulatory Analysis

15 A NCAC 2D .0606 (Appendix P of 40 CFR Part 51) applies to fossil-fired

steam generators of greater than 250 million Btu per hour heat input. This regulation sets forth the minimum requirements for continuous emission monitoring (CEM) and recording that the state implementation plan must include. A CEM (COM) for the measurement of opacity shall be installed, calibrated, maintained and operated in accordance with Appendix P for these coal-fired boilers. Also, excess emissions shall be reported quarterly as described in Appendix P.

ii. Monitoring/Recordkeeping Requirements

A continuous opacity monitoring system (COMS) will be used to monitor and record opacity. Continuous emissions monitoring and recordkeeping of opacity will be performed as described in Paragraphs 2 and 3.1.1 through 3.1.5 of Appendix P of 40 CFR Part 51. The monitoring systems shall meet the minimum specifications described in Paragraphs 3.3 through 3.8 of Appendix P of 40 CFR Part 51. The quarterly excess emissions (EE) reports required under Appendix P of 40 CFR Part 51 shall be used as an indication of good operation and maintenance of the electrostatic precipitators. These boilers shall be deemed to be properly operated and maintained if the percentage of time the opacity emissions, calculated on a 6-minute average, in excess of 40 percent (including startups, shutdowns, and malfunctions) does not exceed 3.0 percent of the total operating time for any given calendar quarter, adjusted for monitor downtime (MD) as calculated below. In addition, these sources shall be deemed to be properly operated and maintained if the %MD does not exceed 2.0 percent.

Calculations for %EE and %MD

Percent Excess Opacity Emission (%EE) Calculation:

$$\%EE = \frac{\text{Total Excess Emission Time}}{\text{Total Source Operating Time} - \text{Monitor Downtime}} \times 100$$

Percent Monitor Downtime (%MD) Calculation for COMS:

$$\%MD = \frac{\text{Total Monitor Downtime}}{\text{Total Source Operating Time}} \times 100$$

* Total Excess Emission Time contains any 6-minute period greater than 40% opacity including startup, shutdown, and malfunction.

** Total Monitor Downtime includes Quality Assurance (QA) activities unless exempted by regulation or defined in an agency approved QA Manual. The

amount of exempt QA Time will be reported in the quarterly report as such.

*** If a source operates less than 2200 hours during any quarter, the source may calculate the %EE and/or %MD using all operating data for the current quarter and the preceding quarters until 2200 hours of data are obtained.

iii. Reporting Requirements

For periods of excess emissions, defined as each 6-minute period average greater than 40 percent opacity, the opacity measurements made by the COMS shall be reported no later than 30 days after the end of the quarter as described in Paragraphs 4 and 5.1 of Appendix P of 40 CFR Part 51 except that a six-minute time period shall be deemed as an appropriate alternative opacity averaging period as described in Paragraph 4.2 of Appendix P of 40 CFR Part 51.

i. 2D .1416 "Emission Allocations for Utility Companies"

i. Regulatory Analysis

(A) After November 1, 2000 but before the EPA promulgation of revisions to 40 CFR Part 51, Subpart G, revising the nitrogen oxide budget for North Carolina, the following limits apply:

- (1) The total emissions from all the coal-fired boilers and combustion turbines that are not listed in 15A NCAC 2D .1417 at Duke Energy Corporation's Allen, Belews Creek, Buck, Cliffside, Dan River, Marshall, and Riverbend facilities shall not exceed:
 - (a) 17,816 tons per ozone season for 2004;
 - (b) 23,072 tons per ozone season for 2005; and
 - (c) 21,278 tons per ozone season for 2006 and each year thereafter until revised according to 15A NCAC 2D .1420.
- (2) Furthermore, except as allowed under 15A NCAC 2D .1419, individual sources at these facilities named in the table in this Subparagraph shall not exceed during the ozone season the nitrogen oxide emission allocations in the table.

SOURCE	NO _x EMISSION ALLOCATIONS (TONS/SEASON) 2004	NO _x EMISSION ALLOCATIONS (TONS/SEASON) 2005	NO _x EMISSION ALLOCATIONS (TONS/SEASON) 2006 AND LATER
ES-1(U4, Boiler 7)	216	280	258

SOURCE	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2004	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2005	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2006 AND LATER
ES-2(U5, Boiler 8)	225	291	268
ES-3(U6, Boiler 9)	285	369	340
ES-4(U7, Boiler 10)	299	387	357

(B) After November 1, 2000, and after any EPA promulgation of revisions to 40 CFR Part 51, Subpart G, revising the nitrogen oxide budget for North Carolina, the following limits apply:

- (1) The total emissions from all the coal-fired boilers and combustion turbines that are not listed in 15A NCAC 2D .1417 at Duke Energy Corporation's Allen, Belews Creek, Buck, Cliffside, Dan River, Marshall, and Riverbend facilities shall not exceed:
 - (a) 17,816 tons per ozone season for 2004;
 - (b) 22,270 tons per ozone season for 2005; and
 - (c) 16,780 tons per ozone season for .2006 and each year thereafter until revised according to 15A NCAC 2D .1420.
- (2) Furthermore, except as allowed under 15A NCAC 2D .1419, individual sources at these facilities named in the table in this Subparagraph shall not exceed during the ozone season the nitrogen oxide emission allocations in the table.

SOURCE	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2004	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2005	NO_x EMISSION ALLOCATIONS (TONS/SEASON) 2006 AND LATER
ES-1(U4, Boiler 7)	216	270	204
ES-2(U5, Boiler 8)	225	281	212
ES-3(U6, Boiler 9)	285	356	268
ES-4(U7, Boiler 10)	299	374	282

(C) These sources will comply with the requirements of 15A NCAC 2D .1416 using the nitrogen oxide budget trading program set out in 15A NCAC 2D .1419.

ii. Monitoring/Recordkeeping/Reporting Requirements

The Permittee shall assure compliance with 15A NCAC 2D .1416 by determining nitrogen oxide emissions in tons per ozone season using a continuous emissions monitoring (CEM) system that meets the requirements of 40 CFR Part 75 Subpart H, with such exceptions as allowed under 40 CFR Part 75, Subpart H or 40 CFR 96. The Permittee shall also comply with 40 CFR 96, Budget Trading Program for State Implementation Plans, for recordkeeping and reporting requirements.

B. four No. 2 fuel oil/natural gas-fired simple-cycle internal combustion turbines (ID Nos. ES-5(CT1), ES-6(CT2), ES-7(CT3) and ES-8(CT4))

1. Description

These simple-cycle turbines have a maximum heat input of 775 million Btu per hour each and began operation in 1969.

The following provides a summary of emission and/or operation limits for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	<p>Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limits apply:</p> <p>40 percent opacity (except during startups) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p> <p>State-only requirement 40 percent opacity (except during startups, shutdowns, and malfunctions) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p>	<p>40 CFR 52 Subpart II</p> <p>15A NCAC 2D .0521</p>

	<p>If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies beginning on the date the final rule is published in the Federal Register:</p> <p>40 percent opacity (except during startups, shutdowns, and malfunctions) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p>	<p>15A NCAC 2D .0521</p>
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a. 2D .0516 "Sulfur Dioxide Emissions From Combustion Sources"

i. Regulatory Analysis

Sulfur dioxide emissions from any source of combustion that is discharged from any vent, stack, or chimney shall not exceed 2.3 pounds per million Btu heat input. Therefore allowable SO₂ emissions are:

$$(2.3 \text{ lb/mmBtu})(775 \text{ mmBtu/hr}) = 1782.5 \text{ lb/hr}$$

There are no control devices to control emissions of sulfur dioxide. The applicant estimates potential SO₂ emissions for No. 2 fuel oil (worst-case fuel) with a sulfur content of 0.5 % by weight to be 391 lb/hr each turbine using an AP-42 (5th Edition) emission factor. Therefore, since this is less than the 2D .0516 allowable, compliance is indicated.

ii. Monitoring/Recordkeeping/Reporting

There are no testing, monitoring, recordkeeping, or reporting requirements for this source due to the inherently low sulfur content of No. 2 fuel oil and natural gas.

b. 40 CFR 52 Subpart II - North Carolina State Implementation Plan

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity (except during startups) when averaged over a six-minute period when averaged over a six-minute period for sources manufactured as of July 1, 1971. This regulation is the "old" 2D .0521, which was replaced by the current 2D .0521 at the state level on April 1, 2001, and remains the only approved opacity rule at the federal level.

Compliance is demonstrated since the facility was found to be operating in compliance with this opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping/Reporting Requirements

There are no monitoring, recordkeeping or reporting requirements.

(State-only requirement)

c. 2D .0521 "Control Of Visible Emissions"

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity when averaged over a six-minute period for sources manufactured as of July 1, 1971. Compliance is indicated since the facility was found to be operating in compliance with this opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping Requirements

To assure compliance, whenever this source operates for not more than 1100 hours using No. 2 fuel oil, the Permittee shall perform a Method 9 test. This procedure will be repeated before each subsequent 1100 hours of operation from the last test. The results of the observations shall be recorded. No opacity monitoring is required while firing natural gas.

iii. Reporting Requirements

The permittee shall submit the results of the Method 9 test as a part of the quarterly report described in Section VI.A.2.h.iii above.

d. 2D .0521 "Control Of Visible Emissions"

If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies beginning on the date the final rule is published in the Federal Register:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity when averaged over a six-minute period for sources manufactured as of July 1, 1971. Compliance is indicated since the facility was found to be operating in compliance with this opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping Requirements

To assure compliance, whenever this source operates for not more than 1100 hours using No. 2 fuel oil, the Permittee shall perform a Method 9 test. This procedure will be repeated before each subsequent 1100 hours of operation from the last test. The results of the observations shall be recorded. No opacity monitoring is required while firing natural gas.

iii. Reporting Requirements

The permittee shall submit the results of the Method 9 test as a part of the quarterly report described in Section VI.A.2.h.iii above.

C. one No. 2 fuel oil-fired auxiliary boiler (ID No. ES-9(Aux))

1. Description

This 11.8 million Btu per hour boiler is only used to generate steam during periods when steam is not available from the main plant boilers and began operation in 1929.

The following provides a summary of emission and/or operation limits for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	0.115 pounds per million Btu heat input	15A NCAC 2D .0503
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	<p>Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limits apply:</p> <p>40 percent opacity (except during startups) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p> <p>State-only requirement 40 percent opacity (except during startups, shutdowns, and malfunctions) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p>	<p>40 CFR 52 Subpart II</p> <p>15A NCAC 2D .0521</p>

	<p>If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies beginning on the date the final rule is published in the Federal Register:</p> <p>40 percent opacity (except during startups, shutdowns, and malfunctions) when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent opacity if (i) no six-minute period exceeds 90 percent opacity, (ii) no more than one six-minute period exceeds 40 percent opacity in any hour, and (iii) no more than four six-minute periods exceed 40 percent opacity in any 24-hour period.</p>	<p>15A NCAC 2D .0521</p>
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a. 2D .0503(a) "Particulates from Fuel Burning Indirect Heat Exchangers"

i. Regulatory Analysis

This rule applies to installations burning fuel, including natural gas and fuel oils, for the purpose of producing heat or power by indirect heat transfer.

Allowable emissions of particulate matter from fuel combustion shall be calculated as follows:

$$E = 1.090 Q^{-0.2594}$$

where: E = allowable particulate emission rate, pounds per million Btu
Q = maximum heat input rate (total at plant site), million Btu per hour

Allowable particulate emissions for this boiler are determined based on the total maximum heat input of all fuel burning indirect heat exchangers at the plant site existing prior to February 1, 1983 (effective date of 2D .0503) of 5731.8 million Btu per hour (1270, 1270, 1590, 1590 and 11.8 for boilers ES-1, ES-2, ES-3, ES-4 and ES-9 respectively). Therefore emissions of particulate matter from these boilers shall not exceed the following:

$$E = 1.090 (5731.8)^{-0.2594} = 0.115 \text{ lb/mmBtu}$$

or:

$$(0.115 \text{ lb/mmBtu})(11.8 \text{ mmBtu/hr}) = 1.36 \text{ lb/hr}$$

There are no control devices to control particulates.

Potential particulate emissions for No. 2 fuel oil are estimated to be 0.17 lb/hr

using an AP-42 (5th Edition) factor of 2.0 lb/1000 gal (AP-42, Table 1.3-2) and a maximum design capacity of 85.3 gallons per hour fuel oil rate as given on form B3 of the application. Therefore, since this is less than the above 2D .0503 allowable emission rate, compliance is indicated.

ii. Monitoring/Recordkeeping/Reporting Requirements

Since the potential particulate emissions are less than the allowable, no monitoring, recordkeeping or reporting are required. Stack testing is not required to ensure compliance with this regulation. However the test method condition will be put in the permit in the event that DAQ or EPA finds that due to improper operation violations, etc, source testing is required.

b. 2D .0516 "Sulfur Dioxide Emissions From Combustion Sources"

i. Regulatory Analysis

Sulfur dioxide emissions from any source of combustion that is discharged from any vent, stack, or chimney shall not exceed 2.3 pounds per million Btu heat input. Therefore allowable SO₂ emissions are:

$$(2.3 \text{ lb/mmBtu})(11.8 \text{ mmBtu/hr}) = 27.14 \text{ lb/hr}$$

There are no control devices to control emissions of sulfur dioxide. Potential SO₂ emissions for No. 2 fuel oil with a sulfur content of 0.5 % by weight are estimated to be 5.94 lb/hr using an AP-42 (5th Edition) factor of 142S lb/1000 gal, where S = % sulfur. Therefore, since this is less than the 2D .0516 allowable, compliance is indicated.

ii. Monitoring/Recordkeeping/Reporting

There are no testing, monitoring, recordkeeping, or reporting requirements for this source due to the inherently low sulfur content of No. 2 fuel oil.

c. 40 CFR 52 Subpart II - North Carolina State Implementation Plan

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity (except during startups) when averaged over a six-minute period when averaged over a six-minute period for sources manufactured as of July 1, 1971. This regulation is the "old"

2D .0521, which was replaced by the current 2D .0521 at the state level on April 1, 2001, and remains the only approved opacity rule at the federal level. Compliance is demonstrated since the facility was found to be operating in compliance with this opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping/Reporting Requirements

There are no monitoring, recordkeeping or reporting requirements.

(State-only requirement)

d. 2D .0521 "Control Of Visible Emissions"

Until the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity when averaged over a six-minute period for sources manufactured as of July 1, 1971. Compliance is indicated since the facility was found to be operating in compliance with this opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping Requirements

To assure compliance, whenever this source operates for not more than 1100 hours using No. 2 fuel oil, the Permittee shall perform a Method 9 test. This procedure will be repeated before each subsequent 1100 hours of operation from the last test. The results of the observations shall be recorded.

iii. Reporting Requirements

The permittee shall submit the results of the Method 9 test as a part of the quarterly report described in Section VI.A.2.h.iii above.

e. 2D .0521 "Control Of Visible Emissions"

If and when the EPA approves the revised 15A NCAC 2D .0521 opacity rule, the following limit applies beginning on the date the final rule is published in the Federal Register:

i. Regulation Analysis

Visible emissions shall not exceed 40 percent opacity when averaged over a six-minute period for sources manufactured as of July 1, 1971. Compliance is indicated since the facility was found to be operating in compliance with this

opacity requirement during the latest inspection.

ii. Monitoring/Recordkeeping Requirements

To assure compliance, whenever this source operates for not more than 1100 hours using No. 2 fuel oil, the Permittee shall perform a Method 9 test. This procedure will be repeated before each subsequent 1100 hours of operation from the last test. The results of the observations shall be recorded.

iii. Reporting Requirements

The permittee shall submit the results of the Method 9 test as a part of the quarterly report described in Section VI.A.2.h.iii above.

D. two coal crushers (ID Nos. CRA and CRB) and two coal conveyors (ID Nos. CB1 and CB2)

1. Description

Two NSPS coal crushers (625 tons per hour each) and two NSPS coal conveyor belts (1250 tons per hour each).

The following provides a summary of emission and/or operation limits for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
visible emissions	20 percent opacity	15A NCAC 2D .0524 (40 CFR Part 60 Subpart Y)
particulate matter	$E = 4.10 P^{0.67}$ where: E = allowable particulate emission rate, lb/hr P = process weight rate, tons/hr	15A NCAC 2D .0515

a. 2D .0524 "New Source Performance Standards" (40 CFR 60 Subpart Y)

i. Regulatory Analysis

Sources subject to federal new source performance standards (NSPS) promulgated in 40 CFR Part 60, Subpart Y shall comply with all emission standards, monitoring, recordkeeping, reporting, maintenance and notification requirements. Such sources shall perform any required performance tests while observing test method and procedural provisions.

These standards apply to a plant which processes more than 200 tons per day. The Riverbend Steam Station has a loading capacity in excess of 200 tons per hour and is thereby subject to this standard.

As required by 40 CFR § 60.252(c), coal processing and conveying equipment (including breakers and crushers) must exhibit less than 20% opacity.

ii. Testing Requirements

Compliance with the Subpart Y standard must be demonstrated by EPA Test Method 9, within 60 days of achieving the maximum production rate, but not later than 180 days after initial startup. This has been completed per MRO letter of 10/11/99 from Michael Landis. Therefore compliance is demonstrated.

iii. Monitoring/Recordkeeping/Reporting Requirements

There are no testing, monitoring, recordkeeping, and reporting requirements for these sources because the crushers are totally enclosed, the conveyors are covered and the transfer point is located inside the power plant building.

b. 2D .0515 "Particulates From Miscellaneous Industrial Processes"

i. Regulatory Analysis

Allowable emissions of particulate matter of any industrial process for which no other emission control standards are applicable shall not exceed the amounts calculated by the following equation:

$$E = 4.10 P^{0.67}$$

where: E = allowable particulate emission rate, lb/hr

P = process weight rate, tons/hr

ii. Monitoring/Recordkeeping/Reporting Requirements

There are no monitoring, recordkeeping, or reporting requirements for this source.

VII. Phase II Acid Rain Requirements

Unit Nos. 7, 8, 9 and 10 at the Riverbend Steam Station are “existing” affected units under 40 CFR Part 72.6 and 15A NCAC 2Q .0401(c)(1) since they began commercial operation before the date of enactment of the Clean Air Act Amendments of 1990 (November 15, 1990). Existing units do not include simple-cycle combustion turbines or units which serve a generator with a nameplate capacity of 25MWe or less.

The following tables identify the SO₂ allowance allocations and NO_x requirements for each affected unit.

		2003	2004	2005	2006	2007
ES-1 Unit 4 Boiler ID No. 7	SO ₂ allowances, under Tables 2, 3, or 4 of 40 CFR part 73.	2152*	2152*	2152*	2152*	2152*
	NO _x limit	<p>Pursuant to 40 CFR 76.8(d)(2), the Division of Air Quality approves a NO_x early election compliance plan for boiler No. 7. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1) of 0.45 lb/mmBtu for tangentially fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(1), of 0.40 lb/mmBtu until calendar year 2008.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

		2003	2004	2005	2006	2007
ES-2 Unit 5 Boiler ID No. 8	SO ₂ allowances, under Tables 2, 3, or 4 of 40 CFR part 73.	2113*	2113*	2113*	2113*	2113*
	NO _x limit	<p>Pursuant to 40 CFR 76.8(d)(2), the Division of Air Quality approves a NO_x early election compliance plan for boiler No. 8. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1) of 0.45 lb/mmBtu for tangentially fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(1), of 0.40 lb/mmBtu until calendar year 2008.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

		2003	2004	2005	2006	2007
ES-3 Unit 6 Boiler ID No. 9	SO ₂ allowances, under Tables 2, 3, or 4 of 40 CFR part 73.	2267*	2267*	2267*	2267*	2267*
	NO _x limit	<p>Pursuant to 40 CFR 76.8(d)(2), the Division of Air Quality approves a NO_x early election compliance plan for boiler No. 9. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1) of 0.45 lb/mmBtu for tangentially fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(1), of 0.40 lb/mmBtu until calendar year 2008.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

		2003	2004	2005	2006	2007
ES-4 Unit 7 Boiler ID No. 10	SO ₂ allowances, under Tables 2, 3, or 4 of 40 CFR part 73.	2626*	2626*	2626*	2626*	2626*
	NO _x limit	<p>Pursuant to 40 CFR 76.8(d)(2), the Division of Air Quality approves a NO_x early election compliance plan for boiler No. 10. The compliance plan is effective for calendar year 2000 through calendar year 2007. Under the compliance plan, this unit's annual average NO_x emission rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1) of 0.45 lb/mmBtu for tangentially fired boilers. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(1), of 0.40 lb/mmBtu until calendar year 2008.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

* The number of allowances allocated to Phase II-affected units by U.S. EPA may change under 40 CFR part 73. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to the unit SO₂ allowance allocations identified in this permit (See 40 CFR 72.84).

VIII. MACT Applicability and Requirements

The facility may be subject to the electric utility and combustion turbine MACT standards which are to be proposed in future.

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified.

Although each insignificant activity is not listed in the Title V permit, a general condition is placed in the Title V permit stating that all insignificant activities shall comply with the applicable requirements. Those sources which qualify for exemption from permitting under regulation 2Q .0503(7) and (8) will be attached to the cover letter of the permit.

XI. General Conditions

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, and severability.

XII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the DRAFT Title V Operating Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list, and EPA. In addition, notice of the DRAFT permit and opportunity for participation shall be given to any affected state on or before the time that the notice is provided to the public. Affected states as specified by 15A NCAC 2Q .0503(1) and 40 CFR 70.8(b) are South Carolina, Georgia, Tennessee and Virginia; North Carolina local air pollution control programs for Western North Carolina Regional Air Pollution Control Agency (Buncome and Haywood Counties), Mecklenburg County and Forsyth County; and the Catawba Indian Nation in York County South Carolina and the Eastern Band of Cherokee Indians in Swain, Jackson and Graham Counties North Carolina.

XIII. Recommendations

The initial Title V application for Duke Energy Corporation, Riverbend Station has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.