

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Winston-Salem Regional Office
County: Rockingham
NC Facility ID: 7900156
Inspector's Name: Eric Hudson
Date of Last Inspection: 12/06/2005
Compliance Code: W/In Violation W/regard To Proc Compliance

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Rockingham Power LLC Facility Address: Rockingham Power LLC 240 Ernest Drive Reidsville, NC 27320 SIC: 4911 / Electric Services NAICS: 221112 / Fossil Fuel Electric Power Generation Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 7900156.06A Date Received: 02/23/2006 Application Type: Modification Application Schedule: TV-Reopen for Cause Existing Permit Data Existing Permit Number: 08731/T05 Existing Permit Issue Date: 03/15/2005 Existing Permit Expiration Date: 11/30/2007
Tracy Robinson Plant Manager (336) 951-1772 240 Earnest Dr Reidsville NC, 27320	Tracy Robinson Plant Manager (336) 951-1772 240 Earnest Dr Reidsville NC, 27320	Barbara Irwin Senior Environmental Professional (217) 872-2363 2828 North Monroe Street Decatur IL, 62526+3269	
Review Engineer: Ed Martin Review Engineer's Signature: _____ Date: _____ DRAFT FOR PUBLIC NOTICE		Comments / Recommendations:	
		Issue 08731/T06 Permit Issue Date: Permit Expiration Date:	

I. Purpose of Application

DAQ is reopening this permit to add monitoring and reporting for the CO CEMs which are currently installed on the turbines. This action is a result of three exceedances (January 23, 2005, June 19, 2005 and December 16, 2005) of the CO BACT limits in 2005. Initially when the permit was first written, it was not anticipated that the turbines would be a large margin of compliance with the CO limits; and therefore the CO CEMs were not addressed in the permit. CO CEMs are not typically required or installed on other facilities with similar sources. Because of the exceedances, the WSRO (Eric Hudson) discussed the issue with Mike Aldridge and Don van der Vaart and Ed Martin of the Central Office. The result of those discussions was that monitoring and reporting for the CO CEMs should be added to the permit in order to both track any further exceedances and specify the requirements to avoid any ambiguity regarding a potential creditable evidence/shield concern for the facility and for DAQ. The NO_x BACT limits and reporting were also revised for consistency and to clarify the requirements (see Section II below).

Rockingham Power was notified that these changes would be made in a letter to Mr. Tracy Robinson (Responsible Official) from Donald D. Redmond (acting supervisor, PSD/Special Permitting) dated March

24, 2006. The permit will be reopened (issued) no earlier than 60 days after the date of receipt of this letter, pursuant to rule 15A NCAC 2Q .0517. The letter was delivered on March 28, 2006 by certified mail.

Also, the federal opacity language is being revised as a result of, and in accordance with EPA's recent approval of the new 2D .0521 visible emissions rule.

Other administrative changes are shown in Section II below.

This reopening is a significant modification following the procedures in 2Q .0501(c)(1) pursuant to 2Q .0517.

II. Permit Changes:

The following changes were made to the Rockingham Power, LLC Generation Facility Air Permit No. 08731T06:

Page(s)	Part, Section	Change
Cover	-	Amended permit numbers and dates.
4	Part I, Section 2.1 A regulation table	Replaced Federal-only 40 CFR 52 Subpart II and State-only 2D .0521 visible emission limits/standards with new approved SIP 2D .0521 visible emission limits/standards.
4-5	Part I, Section 2.1 A.1 (old Sections 2.1 A.1 and 2)	Replaced State-only 2D .0521 and Federal-only 40 CFR 52 Subpart II visible emission Sections 2.1 A.1 and 2 with new approved SIP 2D .0521 visible emission Section 2.1 A.1. Changed subsequent condition numbers.
6	Part I, Section 2.1 A.3.i	Added footnote "b" to the "lb/hr" and "lb/mmBtu" nitrogen oxides emission limits to show those limits are based on a 24-hour rolling average. Added footnote "b" to the carbon monoxide emission limits.
8	Part I, Section 2.1 A.3.h	Added noncompliance language in second sentence to say: "If any 24-hour rolling average exceeds the limits specified in Section 2.1 A. 3. a. i. (except during startup, shutdown or malfunction as allowed by Section 2.1 A. 3. a. i) or records are not maintained, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530."
8	Part I, Section 2.1 A.3.i	Added monitoring and recordkeeping condition for the carbon monoxide CEMS.
8	Part I, Section 2.1 A.3.j.i	Removed reference to periods of excess emissions.
8	Part I, Section 2.1 A.3.j.ii	Revised reporting language to clarify PSD reporting requirements. Removed reference to an excess emissions (calculated according to the requirements of 40 CFR 60.13(h)) and monitoring systems performance report.
8	Part I, Section 2.1 A.3.j.iii	Added reporting condition for the carbon monoxide CEMS.

9	Part I, Section 2.1 A.4.d	Removed NO _x interim reporting which required reporting tons of nitrogen oxides emitted during the previous May and June no later than July 30 of each year, since this requirement has been removed from the 2D .1404(g) rule.
11	Part I, Section 2.1 C regulation table	Replaced Federal-only 40 CFR 52 Subpart II and State-only 2D .0521 visible emission limits/standards with new approved SIP 2D .0521 visible emission limits/standards.
11	Part I, Section 2.1 C.2 (old Sections 2.1 C.2 and 3)	Replaced State-only 2D .0521 and Federal-only 40 CFR 52 Subpart II visible emission Sections 2.1 C.2 and 3 with new approved SIP 2D .0521 visible emission Section 2.1 C.2. Changed subsequent condition number.
13	Part I, Section 2.1 D regulation table	Replaced Federal-only 40 CFR 52 Subpart II and State-only 2D .0521 visible emission limits/standards with new approved SIP 2D .0521 visible emission limits/standards.
13	Part I, Section 2.1 D.2 (old Sections 2.1 D.2 and 3)	Replaced State-only 2D .0521 and Federal-only 40 CFR 52 Subpart II visible emission Sections 2.1 D.2 and 3 with new approved SIP 2D .0521 visible emission Section 2.1 D.2. Changed subsequent condition number.
17-23	Part I, Section 3.A, B, M, P and JJ	Corrected references.
19	Part I, Section 3.I.B	Revised this condition (generic change being made to all permits).
20	Part I, Section 3.P	Changed compliance certification date from January 30 to March 1 (generic change being made to all permits).

III. Applicable Regulations

There are no new regulations that apply.

IV. Facility Description

The facility consists of five No. 2 fuel oil/natural gas-fired simple-cycle combustion turbines (Westinghouse Model No. 501F; 1875 million Btu per hour maximum heat input rate when firing natural gas and 1789 million Btu per hour maximum heat input rate when firing No.2 fuel) equipped with dual-fuel dry-low NO_x combustors for NO_x control when firing natural gas and water injection for NO_x control when firing No. 2 fuel oil

V. Statement of Compliance

Based on observations made during the most recent inspection on December 6, 2005, by Eric Hudson, this facility appeared to be in compliance with Air Quality standards and regulations at the time of the inspection.

VI. Emission Requirements

There are no new emission requirements that apply.

VII. Public Notice of the Draft Permit

Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit will be published in a newspaper of general circulation in the area where the facility is located to provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice will be sent to persons on the Title V mailing list, EPA, and affected states.

Comments Received from Public Notice

later

VIII. EPA Review

later

IX. Recommendations

later