

# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 263-AOP-R1

IS ISSUED TO:

Entergy Services, Inc. - White Bluff Facility  
1100 White Bluff Road  
Redfield , AR 72132  
Jefferson County  
CSN: 35-0110

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

April 24, 1998

and

April 23, 2003

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Keith A. Michaels

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Date Modified

**SECTION I: FACILITY INFORMATION**

PERMITTEE: Entergy Services, Inc. - White Bluff Facility  
CSN: 35-0110  
PERMIT NUMBER: 263-AOP-R1

FACILITY ADDRESS: 1100 White Bluff Road  
Redfield , AR 72132

COUNTY: Jefferson

CONTACT POSITION: Edward L. Green  
TELEPHONE NUMBER: (501) 377-4032

REVIEWING ENGINEER: John Bailey

UTM North-South (X): 3811  
UTM East-West (Y): 579

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## **SECTION II: INTRODUCTION**

Entergy-Arkansas, Inc. operates the White Bluff Steam Electric Station located in Redfield, Arkansas. The White Bluff Plant is a two-unit electric generating station which generates electric energy for sale. The facility is modifying the permit to allow receipt of coal via barge. Barges will arrive at the plant on the Arkansas River. The coal will be transferred from the barge to trucks through a series of conveyors and hoppers.

White Bluff Steam Electric Station operates currently as a base-load facility. In the future it is expected that the plant will operate as more of a peaking unit. The plant has two identical coal-fired units (Units 1 and 2) with a total capacity of approximately 1690 megawatts (MW). Low sulfur sub-bituminous coal is delivered by rail from northeastern Wyoming. Each rail car is equipped with rotary couplings which enable the rotary car dumper to grasp one car at a time and empty it without removing the car from the train. The rotary car dumper is capable of emptying approximately 30 cars per hour. Transfer conveyors move the coal to a transfer tower. From here the coal can be conveyed to three different areas including the plant to be pulverized and burned, the stacker/reclaimer, or dead storage. The stacker reclaimer has the capability of either stacking coal out or reclaiming the coal in the ready storage piles. The dead storage piles are used for long term storage of coal. Each coal pile is also managed by the use of heavy vehicles including front end loaders and bull dozers.

Coal is burned in the steam generators which feed turbine generators to produce electricity. Exhaust gases from both units are expelled through two 1000 foot stacks within a common outer chimney shell. Waste heat dissipation is through two hyperbolic natural draft cooling towers which obtain makeup water from the Arkansas River and from the capture of site drainage. Other major plant components include facilities for storage and handling of coal and disposal of ash; a switch-yard; electrostatic precipitators; water treatment; surge and other ponds; and intake and discharge structures.

Emissions from the plant include sulfur dioxide, nitrogen oxides, and particulates. The emission levels for each of these are governed by Federal and State emission and ambient air regulations. In-stack monitoring is designed to meet the requirements of Acid Rain (40 CFR 75) and New Source Performance Standards. Oxides of nitrogen are subject to NSPS and Acid Rain requirements; particulates are subject to NSPS requirements; and sulfur dioxide emissions are subject to NSPS and Acid Rain requirements. The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	905.0	3807.2	
		PM <sub>10</sub>	188.7	794.0	
		SO <sub>2</sub>	20976.0	91874.5	
		VOC	71.6	310.3	
		CO	6500.7	28473.1	
		NO <sub>x</sub>	12212.1	53488.9	
		Lead	2.2	9.6	
SN-01 (C1)	Unit 1 Boiler - Coal Fired	PM	348.0	1524.3	8
		PM <sub>10</sub>	65.0	284.7	
		SO <sub>2</sub>	10440.0	45727.2	
		VOC	35.0	153.3	
		CO	3247.0	14221.9	
		NO <sub>x</sub>	6090.0	26674.2	
		Lead	1.1	4.8	
SN-01 (C1)	Unit 1 Boiler - No. 2 Fuel Oil	PM	348.0	1524.3	8
		PM <sub>10</sub>	65.0	284.7	
		SO <sub>2</sub>	10440.0	45727.2	
		VOC	35.0	153.3	
		CO	3247.0	14221.9	
		NO <sub>x</sub>	6090.0	26674.2	
		Lead	0.1	0.1	
SN-02 (C2)	Unit 2 Boiler - Coal Fired	PM	348.0	1524.3	8
		PM <sub>10</sub>	65.0	284.7	
		SO <sub>2</sub>	10440.0	45727.2	
		VOC	35.0	153.3	
		CO	3247.0	14221.9	
		NO <sub>x</sub>	6090.0	26674.2	
		Lead	1.1	4.8	
SN-02 (C2)	Unit 2 Boiler - No. 2 Fuel Oil	PM	348.0	1524.3	8
		PM <sub>10</sub>	65.0	284.7	
		SO <sub>2</sub>	10440.0	45727.2	
		VOC	35.0	153.3	
		CO	3247.0	14221.9	
		NO <sub>x</sub>	6090.0	26674.2	
		Lead	0.1	0.1	
SN-04 (M30-31)	Fly Ash Silo w/ Fabric Filters	PM	1.0	4.4	18
		PM <sub>10</sub>	0.1	0.1	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-03 (M1)	Rail Car Rotary Dumper	PM PM <sub>10</sub>	16.0 0.1	70.1 0.1	16
SN-05 (C3)	Auxiliary Boiler	PM PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>x</sub>	2.7 1.4 96.0 0.3 6.7 32.1	11.7 5.9 420.1 1.2 29.3 140.5	8
SN-06	Handling/Conveying Emissions	PM PM <sub>10</sub>	141.0 40.6	617.5 177.5	20
SN-07 (T1)	Fuel Oil Tank	VOC	0.3	1.4	22
SN-14,15,16 (T-26,26,32)	Miscellaneous Storage Tanks	VOC	--	0.2	23
SN-17 (X24)	Cooling Tower	PM PM <sub>10</sub>	4.3 4.3	18.8 18.8	25
SN-18 (X25)	Cooling Tower	PM PM <sub>10</sub>	4.3 4.3	18.8 18.8	25
SN-19	Barge Unloading Operations	PM PM <sub>10</sub>	39.7 7.9	17.3 3.4	27

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### **SECTION III: PERMIT HISTORY**

263-A was the first permit issued to the facility. 263-A permitted the installation of two coal-fired steam electric generating units served by a combined 1000 foot stack. The permit established the New Source Performance Standards limits for sulfur dioxide by usage of low sulfur coal.

263-AR-1 was issued to Arkansas Power & Light Company- White Bluff Steam Electric Station on April 9, 1991. After the issuance of permit 263-A, it was discovered that the particulate emission limitation was 0.027 lb/MMBtu heat input instead of the 40 CFR 60 Subpart D limit of 0.10 lb/MMBtu heat input. The more stringent limitation caused a problem with compliance with the operating permit. Due to the variability in the quality of coal, AP&L requested a revised particulate emission limit in order to maintain compliance with its operating permit. Air permit 263-AR-1 incorporated the new limits for particulate matter, identified source of pollution not previously addressed in the original permit, and estimated pollution emissions from fuel oil storage facilities and air toxic emissions.

0263-AOP is the first operating air permit issued to Entergy-Arkansas, Inc.-White Bluff Steam Electric Station under Regulation 26. No physical changes in the method of operation at the facility occurred prompting this permit issuance.

Entergy-Arkansas, Inc. proposes to increase the CO limit for the White Bluff facility from 300 lb/hr (50 ppm) to 3247.0 lb/hr or 300 ppm hourly ( 100 ppm 24-hour average) to reflect actual emissions indicated by stack testing. This increase in CO emissions is not subject to PSD review, because previous permit limits were based on AP-42 factors that were inaccurate for this facility. Also, the White Bluff Steam Electric Station began construction before the PSD regulations were promulgated. Modeling analysis at a 500 ppm emission rate was conducted and showed no significant impact to the *NAAQS*.

Entergy-Arkansas, Inc. is electing to take on a new NO<sub>x</sub> emission limit of 0.45 lb/MMBtu annual average at White Bluff Units 1 and 2. This early election is allowed under 40 CFR 76 of the Acid Rain Regulations. This limit will apply beginning calendar year 1997. However, Entergy shall not submit an application for an alternative emissions limitation demonstration period until the earlier of January 1, 2008 or early election is terminated pursuant to 40 CFR 76.8. The NSPS limit of 0.7 lb/MMBtu and the state-imposed lb/hr limit will still apply to these units.

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**SECTION IV: EMISSION UNIT INFORMATION**

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**SN-01, 02 and 05 Boilers**

**Source Description**

SN-01 and SN-02 are 8700 million BTU per hour coal fired boilers. The boilers use sub-bituminous coal as their primary fuel and No. 2 fuel oil as the start-up fuel. The boilers are permitted to operate under alternating scenarios. Scenario I represents combustion from coal and Scenario II represents No. 2 fuel oil combustion. The boilers supply steam which feed turbine generators to produce electricity. Both units are subject to NSPS Subpart D, which regulates emissions of particulate matter, sulfur dioxide and nitrogen oxides from fossil fuel-fired steam generators.

Particulate emissions from these two units are controlled with electrostatic precipitators. NSPS emissions standards for particulate matter are 0.1 lb/MMBtu and a maximum opacity of 20 percent. A continuous opacity monitor records emissions opacity.

Sulfur dioxide emissions from SN-01 and SN-02 are limited by the use of low-sulfur coal. The NSPS emission standard for sulfur dioxide is 1.2 lb/MMBtu. A continuous emissions monitor measures sulfur dioxide emissions.

SN-05 is a 183 million BTU per hour boiler. This auxiliary boiler combusts No. 2 fuel oil in order to provide steam for unit start-up activities. There are no control devices associated with this source. Emissions from this boiler are regulated under the State Implementation Plan (SIP), Regulation 19.

**Specific Conditions**

1. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates, when operating under scenario I: coal firing, set forth in the following table.

<b>Source No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>
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SN-01	Unit 1 Boiler	PM <sub>10</sub>	65.0
		SO <sub>2</sub>	10440.0
		VOC	35.0
		CO	3247.0
		NO <sub>x</sub>	6090.0
		Lead	1.1
		Lead	1.1
SN-02	Unit 2 Boiler	PM <sub>10</sub>	65.0
		SO <sub>2</sub>	10440.0
		VOC	35.0
		CO	3247.0
		NO <sub>x</sub>	6090.0
		Lead	1.1
		Lead	1.1

2. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates, when operating under scenario I: coal firing, set forth in the following table.

Source No.	Description	Pollutant	Emission Rate (lb/hr)
SN-01	Unit 1 Boiler	PM	348.0
SN-02	Unit 2 Boiler	PM	348.0

3. SN-01 and SN-02 are subject to 40 CFR, Part 60, Subpart D, Standards of Performance for fossil fuel-fired steam generators due to a heat input capacity of greater than 250 MMBtu/hr. A copy of Subpart D is provided in Appendix A. Applicable provisions of Subpart D, include, but are not limited to:
- Pursuant to 40 CFR 60.42(a)(1), PM emissions shall not exceed 0.1 lb/MMBtu.
  - Pursuant to 40 CFR 60.42(a)(2), opacity shall not exceed 20 percent except as provided by 40 CFR 60.8 and 40 CFR 60.11.
  - Pursuant to 40 CFR 60.43, SO<sub>2</sub> emissions shall not exceed 1.2 lb/MMBtu
  - Pursuant to 40 CFR 60.44(a)(3), NO<sub>x</sub> emissions shall not exceed 0.7 lb/MMBtu.
  - Pursuant to 40 CFR 60.45(a), the permittee shall install, calibrate, and maintain Continuous Emissions Monitoring Systems (CEMS) for NO<sub>x</sub>, SO<sub>2</sub>, CO<sub>2</sub>, and opacity. The CO<sub>2</sub> monitor and analyzer serve as the diluent in this system.

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- f. Pursuant to 40 CFR 60.45(g)(1), excess opacity emissions are defined as any six minute period during which the average opacity emissions exceed 20%, except for one 6 minute average per hour of up to 27 percent opacity.
  - g. Pursuant to 40 CFR 60.45(g)(2), excess SO<sub>2</sub> emissions are defined as any 3 hour period during which the average emissions (arithmetic average of three contiguous one hour periods) of SO<sub>2</sub> as measured by a CEMS exceed the applicable standard under 60.43.
  - h. Pursuant to 40 CFR 60.45(g)(3), excess NO<sub>x</sub> emissions are defined as any 3 hour period during which the average emissions (arithmetic average of three contiguous one hour periods) of NO<sub>x</sub> as measured by a CEMS exceed the applicable standard under 60.44.
  - i. Pursuant to 40 CFR 60.45(g) excess emission and monitoring system performance reports shall be submitted to the ADPC&E for every calendar quarter. Quarterly reports shall be postmarked by the 30th day following the end of the calendar quarter. Excess emissions are defined in 60.45(g)(1).
3. Pursuant to §19.304 of Regulation 19, and 40 CFR 60.43, the sulfur dioxide emissions from SN-01 and SN-02 shall not exceed the NSPS emissions standards limit of 1.2 lb/MMBtu when burning coal or No. 2 fuel oil.
4. Pursuant to §19.304 of Regulation 19, and 40 CFR 60.42, Subpart D, emissions of particulate matter from SN-01 and SN-02 shall not exceed the NSPS emissions standards limit of 0.1 lb/MMBtu when burning coal or No. 2 fuel oil.
5. Pursuant to §19.304 of Regulation 19, and 40 CFR 60.44(a)(3), NO<sub>x</sub> emissions shall not exceed the NSPS emission standard of 0.7 lb/MMBtu when burning coal or No. 2 fuel oil (3-hour rolling average).
6. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the hourly SO<sub>2</sub> emission limit set in Specific Condition 1. These records may be used by the Department for enforcement purposes. Compliance shall be determined as the average emissions (arithmetic average of three contiguous one hour periods) of SO<sub>2</sub> as measured by a CEMS and converted to pounds per MMBtu using corresponding average (arithmetic average of three contiguous one hour periods) stack gas flow rates. These records shall be kept on site and shall be provided to Department personnel upon request. Records shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.
7. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the NO<sub>x</sub> emission limit set in

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Specific Condition 1. These records may be used by the Department for enforcement purposes. Compliance shall be determined as the average emissions (arithmetic average of three contiguous one hour periods) of NO<sub>x</sub> as measured by a CEMS and converted to pounds per MMBtu using corresponding average (arithmetic average of three contiguous one hour periods) stack gas flow rates. These records shall be kept on site and shall be provided to Department personnel upon request. Records shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.

8. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8- 4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) for measuring opacity of emissions and all SO<sub>2</sub>, NO<sub>x</sub>, and oxygen from SN-01 and SN-02 and record the output of the system. The CO<sub>2</sub> monitor and analyzer serve as the diluent in this system. This CEMS shall comply with the Air Division's "Continuous Emission Monitoring System Standards." A copy is provided in Appendix B. The permittee shall report all excess emissions as defined by 40 CFR 60.45(g)(1), (2), and (3) and in accordance with 40 CFR 60.7(c).

Appendix B, Section II, paragraph F shall not apply to Units 1 and 2 as it relates to excess emissions for opacity. For purposes of the opacity emissions limitations only, the permittee shall not have the 5 percent emissions historically allowed for the excess emissions caused by startups, shutdowns, and malfunctions. Excess opacity emissions caused by startups, shutdowns, and malfunctions for Units 1 and 2 are addressed elsewhere in this permit. However, the permittee must report all excess emissions including those excess emissions caused by startups, shutdowns, and malfunctions.

The number of startup and shutdown occurrences that occur at this facility have historically ranged from 12 to 24 per year. In general, startup begins when the ID and FD fans are started with the intent to fire the unit. Normally, startup ends when the unit achieves stable operation and the following operating parameters are met: (1) the electrostatic precipitator is placed in service, and (2) startup oil is no longer necessary to support combustion. Duct sweeps are usually considered a part of the startup operation. For these units, shutdown normally begins when the unit load or output is reduced with the intent of removing the unit from service, or when the unit trips as the result of sudden and unforeseen failure or malfunction. Shutdown usually ends when the unit commences startup.

9. Pursuant to §19.304 of Regulation 19, and 40 CFR 60.7, the permittee shall submit quarterly excess emissions and monitoring systems performance reports to the Department. The reports shall include the magnitude of excess emissions, date and time

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of commencement and completion of each time period of excess emissions, process operating time during reporting period, date and time of each period during which the CEMS were inoperative, identification of each period of excess emissions that occurs during startup, shutdown, and malfunctions of the units, nature and cause of any malfunction (if known), and the corrective action or preventative measure adopted. Reports shall be sent to the following address:

Arkansas Department of Pollution Control and Ecology  
 Air Division  
 Attn: Compliance Inspector Supervisor  
 P.O. Box 8913  
 Little Rock, AR 72219-8913

10. Pursuant to §19.304 of Regulation 19, and 40 CFR 75.10, the permittee shall ensure that all continuous and opacity monitoring systems are in operation and monitoring all unit emissions or opacity at all times, except during periods of calibration, quality assurance, preventative maintenance or repair.
11. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates, when operating under scenario I: coal firing, set forth in the following table.

Source No.	Description	Pollutant	Emission Rate (lb/hr)
SN-01	Unit 1 Boiler	PM <sub>10</sub>	65.0
		SO <sub>2</sub>	10440.0
		VOC	35.0
		CO	3247.0
		NO <sub>x</sub>	6090.0
		Lead	0.1
SN-02	Unit 2 Boiler	PM <sub>10</sub>	65.0
		SO <sub>2</sub>	10440.0
		VOC	35.0
		CO	3247.0
		NO <sub>x</sub>	6090.0
		Lead	0.1

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12. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates, when operating under scenario I: coal firing, set forth in the following table.

<b>Source No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>
SN-01	Unit 1 Boiler	PM	348.0
SN-02	Unit 2 Boiler	PM	348.0

13. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the hourly SO<sub>2</sub> emission limit set in Specific Condition 11. These records may be used by the Department for enforcement purposes. Compliance shall be determined as the average emissions (arithmetic average of three contiguous one hour periods) of SO<sub>2</sub> as measured by a CEMS and converted to pounds per MMBtu using corresponding average (arithmetic average of three contiguous one hour periods) stack gas flow rates. These records shall be kept on site and shall be provided to Department personnel upon request. Records shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.
14. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the NO<sub>x</sub> emission limit set in Specific Condition 11. These records may be used by the Department for enforcement purposes. Compliance shall be determined as the average emissions (arithmetic average of three contiguous one hour periods) of NO<sub>x</sub> as measured by a CEMS and converted to pounds per MMBtu using corresponding average (arithmetic average of three contiguous one hour periods) stack gas flow rates. These records shall be kept on site and shall be provided to Department personnel upon request. Records shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.
15. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall sample and analyze each shipment of fuel oil to determine the sulfur content. The sulfur content shall not exceed 0.5 weight percent. Fuel oil sampling and analysis may be performed by the owner or operator of an affected unit, an outside laboratory, or a fuel supplier, provided that sampling is performed according to ASTM D4057-88. A shipment will be referred to as any 5000 or 10000 barrel lot delivered to a pipeline and pumped to a loading rack.

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16. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, No. 2 fuel oil is the only fuel permitted for use in the Auxiliary boiler, SN-05.
17. Pursuant to General Condition 16, the permittee shall contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 91875.6 tons/year of SO<sub>2</sub> emissions for any consecutive twelve month period from SN-01 and SN-02 when firing coal or No. 2 fuel oil.
19. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 18. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.
20. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed 53496.9 tons/year of NO<sub>x</sub> emissions for any consecutive twelve month period from SN-01 and SN-02 when firing coal or No. 2 fuel oil.
21. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Specific Condition 20. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request. An annual total and each individual month's data shall be submitted in accordance with General Provision 8 and Plantwide Condition 7.
22. Pursuant to §19.304 of Regulation 19, and 40 CFR 75, the permittee shall submit the required Electronic Data Reports to EPA Headquarters.
23. Pursuant to §19.304 of Regulation 19, and 40 CFR 75.10, the permittee will perform Relative Accuracy tests. This relative accuracy test will meet the requirements under 40 CFR, Part 60, Subpart D.
24. Pursuant to §19.304 of Regulation 19, and 40 CFR 75.10(c), the permittee shall determine and record the heat input to each affected unit for every hour or part of an hour

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any fuel is combusted following the procedures in Appendix F of 40 CFR Part 75. This calculation will meet the requirements under 40 CFR, Part 60, Subpart D.

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**SN-03 Rail Car Rotary Dumper**

**Source Description**

The coal for the White Bluff Steam Electric Station is received by rail. Each rail car is equipped with rotary couplings which enable the rail car rotary dumper to grasp one car at a time and empty it without removing the car from the train. The rail car rotary dumper, SN-03, is capable of emptying approximately 30 cars per hour. There are no control devices associated with this source. Emissions from the rail car rotary dumper are regulated under the State Implementation Plan (SIP), Regulation 19.

**Specific Conditions**

25. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates at SN-03 set forth in the following table.

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM <sub>10</sub>	0.1	0.1

26. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates at SN-03 set forth in the following table.

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM	16.0	70.1

27. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere any emissions which exhibit an opacity greater than 20 percent. The opacity shall be measured in accordance with EPA Reference Method 9.
28. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall use water sprays while the dumper is operating. Compliance with this condition shall represent compliance with this source's applicable requirements.

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29. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall comply with the maintenance plan submitted to the Department for the rotary car dumper (See Appendix C). Compliance with the maintenance plan may demonstrate compliance with the limits set in Specific Condition 25. Requirements include, but are not limited to, the following:
- a. Inspect primary and secondary tubes for pluggage and wear
  - b. Inspect and adjust v-belt
  - c. Inspect secondary fan impeller for wear
  - d. Inspect all bearings for grease and vibration
  - e. Check dust outlet for pluggage
  - f. Inspect rotoclone bearings
  - g. Inspect fan housing for cracks
  - h. Inspect fan blades for dust buildup
  - i. Inspect spray nozzles for pluggage
  - j. Clean strainers (regulator strainer and basket strainer)
  - k. Check motor for vibration
  - l. Check bearing temperature

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**SN-04 Fly Ash Silos (2) w/fabric filters**  
**Source Description**

The White Bluff Steam Electric Station is equipped with two (2) fly ash silos. Particulate emissions from the silos are controlled by fabric filters, SN-04, with a control efficiency of 98 percent. Emissions are regulated under the State Implementation Plan, (SIP), Regulation 19.

**Specific Conditions**

30. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates at SN-04 specified in the following table. Compliance with Plantwide Condition 8 shall represent compliance with this source’s applicable requirements.

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM <sub>10</sub>	0.1	0.1

31. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates at SN-04 specified in the following table. Compliance with Plantwide Condition 8 shall represent compliance with this source’s applicable requirements.

<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
PM	1.0	4.4

32. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere any emissions which exhibit an opacity greater than 20 percent. The opacity shall be measured in accordance with EPA Reference Method 9.
33. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall comply with the maintenance plan submitted to the Department for the fly ash silos (See Appendix C). Compliance with the maintenance plan may demonstrate compliance with the limits set in Specific Condition 30. Requirements include but are not limited to the following:
- a. Check air leaks on pulsation system
  - b. Check air operated valves

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- c. Check piping and supports
- d. Check air cylinders
- e. Check baghouse doors and seals
- f. Check diffuser blower bearings for heat and vibration
- g. Check bags
- h. Check blower case for excessive heat buildup
- i. Check inlet filter and change as needed

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## **SN-06 Handling/Conveying Emissions**

### **Source Description**

Minor emission sources at the plant include coal handling/conveying operations (not subject to NSPS Subpart Y). Fugitive dust emissions from the coal handling operations are controlled with amerclones, rotoclones and wet sprays. These control devices do not operate at all times due to maintenance or ambient temperatures below zero. Emissions are regulated under the State Implementation Plan, (SIP), Regulation 19.

#### **Rotoclone Units**

- 1 - (M-7) American Air Filter, Size 20, type “W” rated at 9600 CFM, wet type
- 1 - (M-14) American Air Filter, Size 20, type “W” rated at 9600 CFM, wet type
- 1 - (M-2) American Air Filter, Size 24, type “W” rated at 13600 CFM, wet type w/American Air Filter, Size 15, AMERclone
- 1 - (M-5) American Air Filter, Size 24, type “W” rated at 21500 CFM, wet type w/American Air Filter, Size 12, AMERclone
- 1 - (M-25) American Air Filter, Size 27, type “W” rated at 16400 CFM, wet type
- 1 - (M-26) American Air Filter, Size 27, type “W” rated at 16400 CFM, wet type
- 1 - (M-6) American Air Filter, Size 36, type “W” rated at 26800 CFM, wet type w/American Air Filter, Size 27, AMERclone
- 1 - (M-12) American Air Filter, Size 36, type “W” rated at 27500 CFM, wet type w/American Air Filter, Size 27, AMERclone
- 1 - (M-24) American Air Filter, Size 36, type “W” rated at 2600 CFM, wet type w/American Air Filter, Size 27, AMERclone
- 1 - (M-8) American Air Filter, Size 45, type “W” rated at 36200 CFM, wet type w/American Air Filter, Size 36, AMERclone

Modified

### **Specific Conditions**

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34. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates at SN-06 specified in the following table. Compliance with Plantwide Condition 8 shall represent compliance with this source’s applicable requirements.

<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
PM <sub>10</sub>	40.6	177.5

35. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates at SN-06 specified in the following table. Compliance with Plantwide Condition 8 shall represent compliance with this source’s applicable requirements.

<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
PM	141.0	617.5

36. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere from this source any emissions which exhibit an opacity greater than 20 percent. The opacity shall be measured in accordance with EPA Reference Method 9.
37. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall conduct weekly observations of the opacity from SN-06 and keep records of these observations. If visible emissions are detected, then the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method 9. The results of these observations shall be kept on site and made available for inspection upon request.

**SN-07 Fuel Oil Storage Tank**

**Source Description**

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No. 2 Fuel Oil is stored in a storage tank (SN-07) on site. The tank has a capacity of 3,360,000 gallons or 80,000 barrels. The tank is cylindrical with a fixed roof. No. 2 Fuel Oil is stored at a minimum temperature of 64.0°F and a maximum temperature of 89.9°F. Emissions from the storage tank are 1.4 tons/year of volatile organic compounds (VOCs). Emissions are regulated under the State Implementation Plan (SIP), Regulation 19.

**Specific Conditions**

38. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates at SN-07 specified in the following table.

<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
VOC	0.3	1.4

39. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the annual throughput limit of 112,000,000 gallons of No. 2 Fuel Oil at SN-07 during any consecutive twelve month period. Compliance with this condition shall represent compliance with this source's applicable requirements.
40. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set forth in Specific Condition 39. These records may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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**Miscellaneous Storage Tanks**  
**(SN-14 through SN-16)**

**Source Description**

The White Bluff Steam Electric Station has numerous storage tanks which store fuel oil and gasoline. Emissions from the tanks are volatile organic compounds (VOCs) which are regulated under the State Implementation Plan (SIP), Regulation 19.

**Specific Conditions**

41. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates specified in the following table.

<b>Source Number</b>	<b>Pollutant</b>	<b>Emission Rate (tpy)</b>
SN-14 (T25) 25,000 gal No. 2 fuel oil	VOC	0.2
SN-15 (T26) 10,000 gal No. 2 fuel oil		
SN-16 (T32) 4,000 gal Gasoline		

42. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall store only distillate fuel oil No.2 in storage tanks SN-14 and SN-15.
43. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall store only gasoline (9.2 psia vapor pressure or less) in storage tank SN-16.

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44. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the annual throughput limit of 9,308 gallons of fuel at SN-14 during any consecutive twelve month period. Compliance with this condition shall represent compliance with the source's applicable requirements.
45. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the annual throughput limit of 180,000 gallons of fuel at SN-15 during any consecutive twelve month period. Compliance with this condition shall represent compliance with the source's applicable requirements.
46. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the annual throughput limit of 15,600 gallons of fuel at SN-16 during any consecutive twelve month period. Compliance with this condition shall represent compliance with the source's applicable requirements.
47. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limits set forth in the Specific Conditions 44-46. These records may be used by the Department for enforcement purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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**SN-17 and SN-18 Cooling Towers**  
**Source Description**

The White Bluff Steam Electric Station operates two (2) cooling towers for the purpose of waste heat dissipation. The cooling towers obtain makeup water from the Arkansas River and from the capture of site drainage. Emissions from the towers are particulate matter which are regulated under the State Implementation Plan (SIP), Regulation 19.

**Specific Conditions**

48. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates specified in the following table.

<b>Source Number</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
SN-17 (X24)	PM <sub>10</sub>	4.3	18.8
SN-18 (X25)	PM <sub>10</sub>	4.3	18.8

49. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates specified in the following table.

<b>Source Number</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
SN-17 (X24)	PM/PM <sub>10</sub>	4.3	18.8
SN-18 (X25)	PM	4.3	18.8

50. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere from these sources any emissions which exhibit an opacity greater than 20 percent. The opacity shall be measured in accordance with EPA Reference Method 9.

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51. Pursuant to §19.303 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the cooling towers within the design specifications listed in Appendix C. Compliance with the design specifications may demonstrate compliance with the limit specified in Specific Condition 48.
52. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, total dissolved solids shall not exceed 3,000 parts per million.
53. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the circulating water flow for SN-17 and SN-18 shall not exceed 19,560 kgal/hr.

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**SN-19 Barge Unloading Operations**  
**Source Description**

Entergy is receiving coal by barge, which will result in particulate emissions from a variety of transfer point and from hauling the delivered coal via truck from the barge to the on-site coal storage piles.

**Specific Conditions**

54. Pursuant to §19.501 of Regulation 19 et seq, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates specified in the following table.

<b>Source Number</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
SN-19	PM <sub>10</sub>	7.9	3.4

55. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates specified in the following table.

<b>Source Number</b>	<b>Pollutant</b>	<b>Emission Rate (lb/hr)</b>	<b>Emission Rate (tpy)</b>
SN-19	PM	39.7	17.3

56. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not cause to be discharged to the atmosphere from these sources any emissions which exhibit an opacity greater than 20 percent. The opacity shall be measured in accordance with EPA Reference Method 9.
57. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not exceed the annual throughput limit of 500,000 tons of coal at SN-19 during any consecutive twelve month period.
58. Pursuant to §19.705 of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall maintain purchase records which demonstrate compliance with the limits set forth in the Specific Condition 57. These records may be used by the Department for enforcement

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purposes. These records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

The White Bluff facility is presently in compliance with applicable regulations. The White Bluff facility shall continue to operate in compliance with the identified regulatory provisions and shall meet any future regulations that may apply.

### Existing Monitoring

White Bluff currently monitors SO<sub>2</sub>, NO<sub>x</sub>, and opacity. Quarterly reports of emissions are submitted to the EPA and the Department to meet NSPS and Acid Rain requirements under 40 CFR 60 and 40 CFR 75.

### Emission Limit Increase in CO

White Bluff proposes to increase CO emissions from 300 lb/hr to 3247 lb/hr. Air dispersion modeling was performed to determine whether or not the allowable emissions from the proposed source, in conjunction with all other applicable emission increases or reductions, would cause or contribute to a violation of the applicable PSD increments and the National Ambient Air Quality Standards (NAAQS).

In order to obtain maximum boiler efficiency, the air flow into the boiler must be maintained at certain levels. If too little air is introduced into the boiler, then there will be incomplete combustion, which will result in very high CO emissions. If too much air is introduced into the boiler, then more air will need to be heated, more heat will be lost to stack exhaust, and there can be a higher NO<sub>x</sub> concentration. Entergy explains that it is not possible for the boilers to operate at the 300 lb/hr limit (50 ppm) on a continuous basis without adversely affecting boiler performance and efficiency.

Entergy argues that the factors (AP-42) used in limiting CO emissions in the current permit are apparently erroneous for the White Bluff facility. The facility has not made any changes or expansions that would constitute a modification as defined in Section 19.2(m) of Regulation 19. Entergy proposes to have the permit reflect actual emissions as indicated by stack testing.

### NO<sub>x</sub> Early Election

This facility is electing to comply with a 0.45 lb/MMBtu annual average for NO<sub>x</sub> emissions under 40 CFR 76, Acid Rain. Compliance will begin in the year 1997 and will be determined by the average emission rate as determined under 40 CFR 75, Continuous Emissions Monitoring Systems (CEMS) at the end of each calendar year. This limit will not affect the existing NSPS limit of 0.7 lb/MMBtu hourly limit.

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## **SECTION VI: PLANTWIDE CONDITIONS**

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
  1. Sampling ports adequate for applicable test methods
  2. Safe sampling platforms
  3. Safe access to sampling platforms
  4. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to §19.7 of Regulation 19, all reports shall be submitted within 30 days after the end of the reporting period. The first reporting period starts on the day of the permit issuance. The first report shall contain data for the first six months of operation after the date of issuance. The second and all subsequent reports shall contain 12 consecutive months of data.
8. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR 70.6, the annual throughput of coal at the facility shall not exceed 9.2 million tons of coal per year during any consecutive twelve month period.
9. Pursuant to §19.7 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the limit set in Plantwide Condition 8. These records may be used by the Department for enforcement purposes. The records shall be updated on a monthly basis, shall be kept on site, and shall be provided to Department personnel upon request.
10. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall supersede and void all previously issued air permits for this facility.

**Acid Rain (Title IV)**

11. Pursuant to §7(a) of Regulation #26 and 40 CFR 70.6(a)(4), the permittee is prohibited from causing any emissions which exceed any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder. No permit revision is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement of this permit or the Act. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Act.

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**Title VI Provisions**

12. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
  1. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
  2. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  3. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
  4. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
13. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  3. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
  5. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
14. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

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15. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

16. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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**SECTION VII: INSIGNIFICANT ACTIVITIES**

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 1, 1998

Description	Category
<b>32</b> - Storage tanks less than 10,000 gallons storing organic liquids having a true vapor pressure less than or equal to 0.5 psia. (T4 through T10)	A3
<b>7</b> - Storage tanks less than 250 gallons storing organic liquids having a true vapor pressure less than or equal to 3.5 psia. (T56, T64 through T72, T74)	A2
<b>2</b> - Caustic storage tanks containing no VOCs. (T48 and T50)	A4
Emissions from laboratory equipment/vents (T93)	A5
<b>4</b> - Storage tanks for turbine lube oil (T2, T3, T11, & T12)	A13
<b>1</b> - Emergency Diesel Generator which is not operated on more than 90 days of any 12 consecutive months (C4)	A12
<b>1</b> - Fire Pump Emergency Diesel Generator which is not operated on more than 90 days of any 12 consecutive months (C5)	A12
Emissions from fuel dispensing stations (X16 through X21)	A13
Emissions from wastewater sources (W1 through W10)	B43

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.
2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.
4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.
5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.
14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving

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- parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.<sup>1</sup>
15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.
  16. Portable electrical generators that can be “moved by hand” from one location to another.<sup>2</sup>
  17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.
  18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.<sup>3</sup>
  19. Air compressors and pneumatically operated equipment, including hand tools.
  20. Batteries and battery charging stations, except at battery manufacturing plants.
  21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.<sup>4</sup>
  22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

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<sup>1</sup> Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

<sup>2</sup> “Moved by hand” means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

<sup>3</sup> Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

<sup>4</sup> Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

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23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.
24. Drop hammers or presses for forging or metalworking.
25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
26. Vents from continuous emissions monitors and other analyzers.
27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.
29. Lasers used only on metals and other materials which do not emit HAPs in the process.
30. Consumer use of paper trimmers/binders.
31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.

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38. Environmental chambers not using hazardous air pollutant gases.
39. Shock chambers, humidity chambers, and solar simulators.
40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.
45. Oxygen scavenging (de-aeration) of water.
46. Ozone generators.
47. Fire suppression systems.
48. Emergency road flares.
49. Steam vents and safety relief valves.
50. Steam leaks.
51. Steam cleaning operations.
52. Steam and microwave sterilizers.
53. Site assessment work to characterize waste disposal or remediation sites.
54. Miscellaneous additions or upgrades of instrumentation.

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55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.
56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).
57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.
58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.
59. Residential wood heaters, cookstoves, or fireplaces.
60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.
61. Log wetting areas and log flumes.
62. Periodic use of pressurized air for cleanup.
63. Solid waste dumpsters.
64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.
65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.
66. Emissions from engine crankcase vents.
67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting of an unanticipated release.
68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.
69. Mixers, blenders, roll mills, or calenders for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.

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70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).
71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.
72. Tall oil soap storage, skimming, and loading.
73. Water heaters used strictly for domestic (non-process) purposes.
74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.
75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.
76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

**SECTION VIII: GENERAL PROVISIONS**

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
  1. The date, place as defined in this permit, and time of sampling or measurements;
  2. The date(s) analyses were performed;
  3. The company or entity that performed the analyses;
  4. The analytical techniques or methods used;
  5. The results of such analyses; and

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6. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913  
Little Rock, AR 72219

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
  1. The facility name and location,
  2. The process unit or emission source which is deviating from the permit limit,
  3. The permit limit, including the identification of pollutants, from which deviation occurs,
  4. The date and time the deviation started,
  5. The duration of the deviation,
  6. The average emissions during the deviation,
  7. The probable cause of such deviations,
  8. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
  9. The name of the person submitting the report.

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A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, 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.

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12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit 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.
13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director 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 Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, 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 elsewhere in this permit.
17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

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19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
  1. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  4. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
  1. The identification of each term or condition of the permit that is the basis of the certification;
  2. The compliance status;
  3. Whether compliance was continuous or intermittent;
  4. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  5. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

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1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  2. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  3. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
  4. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

## **APPENDIX A**

## **APPENDIX B**

## **APPENDIX C**

## **APPENDIX D**

# INVOICE REQUEST FORM

PDS- \_\_\_\_\_

Date October 11, 2001

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 35-0110

Facility Name Entergy Services, Inc. - White Bluff Facility

Invoice Mailing Address 425 West Capitol Ave. PO Box 551

Little Rock, Arkansas 72203

<input type="checkbox"/>	Initial
<input checked="" type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 263-AOP-R1

Permit Description Title 5

Permit Fee Code A

Amount Due \$ 500

Engineer John Bailey

Paid? GNo GYes Check # \_\_\_\_\_

Comments: Air Permit Fee Calculation

## Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 6(b), the Air Division of the Arkansas Department of Pollution Control and Ecology gives the following notice:

Entergy-Arkansas, Inc. operates the White Bluff Steam Electric Station located in Redfield, Arkansas. The White Bluff Plant is a two-unit electric generating station which generates electric energy for sale. The facility is modifying the permit to allow receipt of coal via barge. Barges will arrive at the plant on the Arkansas River. The coal will be transferred from the barge to trucks through a series of conveyors and hoppers.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact John Bailey, Engineer. Both Rhonda Sharp and John Bailey can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Watson Memorial Library at the University of Arkansas at Pine Bluff, Pine Bluff, Arkansas 71601. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Randall Mathis  
Director