

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 263-AOP-R3

1. PERMITTING AUTHORITY:
Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913
2. APPLICANT:
Entergy Arkansas, Inc. - White Bluff
1100 White Bluff Road
Redfield, Arkansas 72132
3. PERMIT WRITER: Ann Sudmeyer
4. PROCESS DESCRIPTION AND SIC CODE:
NAICS Description: Fossil Fuel Electric Power Generation
NAICS Code: 221112
5. SUBMITTALS: December 16, 2002
6. REVIEWER'S NOTES:
Entergy Arkansas, Inc. - White Bluff located in Redfield, Arkansas is a two-unit electric generating station which generates electric energy for sale. In addition to renewing the facility's Title V air permit, this permitting action is necessary to:
 1. Permit emissions of hazardous air pollutants (HAPs);
 2. Recalculate the permitted coal handling emission rates (SN-06);
 3. Increase the throughput of SN-14 and SN-16;
 4. Update the PM and PM₁₀ emission rates (SN-01, SN-02, and SN-05) to include condensable particulate matter;
 5. Update the insignificant activities list;
 6. Add new stack testing requirements for PM, PM₁₀, and CO;
 7. Permit the degreasers (SN-20) which were previously submitted as insignificant;
 8. Correct the fly ash silos (SN-04) permitted PM emission rates;
 9. Correct the facility name to Entergy Arkansas, Inc. from Entergy Services, Inc.;
 10. Remove emission point M32 (SN-06A) since this emission point has been removed from service;
 11. Increase the cooling tower circulating water flow rates (SN-17 and SN-18); and
 12. Reduce the permitted VOC content of the chemical foam spray used at SN-03 and SN-06A.

The total permitted emission rate increases due to this permitting action include: 1,013.6 tons per year (tpy) PM, 738.7 tpy PM₁₀, 39.2 tpy SO₂, and all hazardous air pollutant and air contaminant emission rates for this facility are increasing due to these pollutants previously not being permitted.

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There is one upcoming MACT standard that has the potential to apply to SN-01 and SN-02 at this facility (40 CFR Part 63, Subpart UUUUU – *National Emission Standards for Hazardous Air Pollutants for Coal- or Oil-Fired Electric Utility Steam Generating Units* or in the alternative Amended 40 CFR Part 60, Subpart Da). There is one upcoming MACT standard that has the potential to apply to SN-05 at this facility (40 CFR 63 DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*). These will need to be further evaluated once the standards are finalized.

Previously the coal pile was segregated into four separate areas: M4, M11, and M19. This permitting action combines all of these areas into one emission point M11. M11 is one part of SN-06.

The CAM for SN-01 and SN-02 is the COMS. The CAM for SN-04 is daily opacity observations and baghouse maintenance inspections.

Although the permitted emission rates for the facility are increasing by 1,013.6 tpy PM and 738.7 tpy PM₁₀ for this modification, this permit did not require PSD review because there is no physical change associated with the majority of the PM/PM₁₀ permitted emission rate increases. These increases are due to updating the permitted PM₁₀ and PM emission rates based on AP-42 emission factors, including condensable particulate matter in the boiler emission rates, and correcting and revising the coal handling emission calculations. The repair of the pumps for SN-17 and SN-18 amounts to a permitted increase of 2.2 tpy PM/PM₁₀.

The permitted SO₂ emission limit increase of 39.2 tpy at SN-05 appears to be due to a change in the emission factor.

The Degreasers (SN-20) were previously submitted under insignificant category B-15. Since this category does not apply to this emission point, it is being added to the permit as a source.

7. COMPLIANCE STATUS:

The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

Entergy Arkansas, Inc. – White Bluff is currently operating under CAO LIS 03-027. This CAO addresses Entergy's Title V renewal application not being submitted in a timely manner.

On June 2, 2002, an enforcement discretion letter was written for the exceeding the throughput limit at SN-14.

An inspection on June 23, 2004 revealed non-compliance with Specific Conditions #3b, #3f, #9, #10, and General Provision #8. These issues have not yet been reviewed by the enforcement section.

8. **APPLICABLE REGULATIONS:**

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera)? Y/N N

Has this facility undergone PSD review in the past? Y/N N Permit# N/A

Is this facility categorized as a major source for PSD?
 ≥ 100 tpy and on the list of 28 (100 tpy)? Y/N Y

≥ 250 tpy all other Y/N Y

PSD Netting

Was netting performed to avoid PSD review in this permit? Y/N N

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-01 SN-02	PM SO ₂ NO _x CO ₂ opacity	40 CFR Part 60, Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971
Facility	Asbestos	40 CFR Part 61, Subpart M – National Emission Standard for Asbestos

9. **EMISSION CHANGES:**

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #263-AOP-R2	Air Permit #263-AOP-R3	Change
PM	3615.3	4628.9	1013.6
PM ₁₀	752.0	1490.7	738.7
SO ₂	91874.5	91913.7	39.2

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Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #263-AOP-R2	Air Permit #263-AOP-R3	Change
VOC	327.1	322.4	-4.7
CO	28473.1	28473.1	0
NO _x	53488.9	53488.9	0
Lead	9.6	2.1	-7.5
Acenaphthene	0	0.02	0.02
Acenaphthylene	0	0.02	0.02
Acetaldehyde	0	2.64	2.64
Acrolein	0	1.34	1.34
Anthracene	0	0.02	0.02
Arsenic	0	1.91	1.91
Benzene	0	5.98	5.98
Benzyl Chloride	0	3.22	3.22
Beryllium	0	0.11	0.11
Cadmium	0	0.25	0.25
Carbon Disulfide	0	0.60	0.60
2-Chloroacetophenone	0	0.04	0.04
Chloroform	0	0.28	0.28
Chromium	0	1.21	1.21
Chromium VI	0	0.38	0.38
Cobalt	0	0.46	0.46
Cyanide	0	11.50	11.50
Dimethyl Sulfate	0	0.24	0.24
Ethylene Dichloride	0	0.20	0.20
Fluoranthene	0	0.02	0.02
Fluorene	0	0.02	0.02
Formaldehyde	0	3.37	3.37
Hydrogen Chloride	0	5518.80	5518.80
Hydrogen Fluoride	0	689.86	689.86
Isophorone	0	2.68	2.68
Manganese	0	2.27	2.27
Mercury	0	0.41	0.41
Methyl Chloride	0	2.44	2.44

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #263-AOP-R2	Air Permit #263-AOP-R3	Change
Methyl Ethyl Ketone	0	1.80	1.80
Methyl Hydrazine	0	0.80	0.80
Methylene Chloride	0	1.34	1.34
Nickel	0	1.31	1.31
Phenanthrene	0	0.02	0.02
Phenol	0	0.08	0.08
Polycyclic Organic Matter	0	0.24	0.24
Propionaldehyde	0	1.76	1.76
Pyrene	0	0.02	0.02
Selenium	0	6.00	6.00
Styrene	0	0.12	0.12
Toluene	0	1.12	1.12
2,3,7,8-TCDD	0	0.02	0.02
N ₂ O	0	368.57	368.57

10. MODELING:

Criteria Pollutants

VOC emissions were not modeled since they are less than 500 tpy.

Pollutant	Emission Rate (lb/hr)	NAAQS Standard (µg/m ³)	Averaging Time	Highest Concentration (µg/m ³)	% of NAAQS
PM ₁₀	357.5	50	Annual	38.8*	77.6%
		150	24-hour	128.9*	86.0%
SO ₂	20,984.9	80	Annual	25.0**	31.3%
		1,300	3-hour	1,227.4**	94.5%
		365	24-hour	245.2**	67.2%
NO _x	12,212.1	100	Annual	94.4**	94.4%
CO	6,500.7	10,000	8-hour	285.3	2.9%
		40,000	1-hour	527.9	1.4%

*Refined modeling was submitted by the consultant for PM₁₀. This number includes background concentrations of 24.0 µg/m³ annual average (2004) and 47.0 µg/m³ 24-hour average (2004).

**Includes background concentrations.

11. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department deemed PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Acenaphthene ^{POM*}	0.2	0.022	0.02	Y
Acenaphthylene ^{POM*}	0.2	0.022	0.02	Y
Acetaldehyde**	45.04	4.9544	0.60	Y
Acrolein**	0.22	0.0242	0.32	N
Anthracene ^{POM*}	0.2	0.022	0.02	Y
Arsenic	0.01	0.0011	0.45	N
Benzene	1.59	0.1749	1.38	N
Benzyl Chloride	5.17	0.5687	0.74	N
Beryllium	0.002	0.00022	0.05	N
Cadmium	0.002	0.00022	0.07	N
Carbon Disulfide	31.14	3.4254	0.14	Y
2-Chloroacetophenone	0.31	0.0341	0.02	Y
Chloroform	48.82	5.3702	0.08	Y
Chromium	0.01	0.0011	0.29	N
Chromium VI	0.01	0.0011	0.10	N
Cobalt	0.02	0.0022	0.12	N
Cyanide***	5.19	0.5709	2.64	N
Dimethyl Sulfate	0.51	0.0561	0.06	N
Ethylene Dichloride	40.47	4.4517	0.06	Y
Fluoranthene ^{POM*}	0.2	0.022	0.02	Y
Fluorene ^{POM*}	0.2	0.022	0.02	Y
Formaldehyde**	0.36	0.0396	0.79	N
Hydrogen Chloride**	7.45	0.8195	1,260.00	N
Hydrogen Fluoride**	2.45	0.2695	157.5	N
Isophorone**	28.26	3.1086	0.62	Y
Manganese	0.2	0.022	0.53	N
Mercury	0.01	0.0011	0.11	N
Methyl Chloride	103.25	11.3575	0.56	Y
Methyl Ethyl Ketone	589.77	64.8747	0.42	Y
Methyl Hydrazine	0.01	0.0011	0.18	N
Methylene Chloride	173.68	19.1048	0.32	Y

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Nickel	0.1	0.011	0.31	N
Phenanthrene ^{POM*}	0.2	0.022	0.02	Y
Phenol	19.24	2.1164	0.02	Y
Polycyclic Organic Matter*	0.2	0.022	0.07	N
Propionaldehyde	47.52	5.2272	0.40	Y
Pyrene ^{POM*}	0.2	0.022	0.02	Y
Selenium	0.2	0.022	1.39	N
Styrene	85.20	9.372	0.04	Y
2,3,7,8-TCDD	0.001****	0.00011	0.02	N
Toluene	188.40	20.724	0.26	Y
Lead	0.05	0.0055	0.7	N
N ₂ O	90.02	9.90	84.15	N

* TLV for coal tar pitch volatiles.

**Ceiling Limit TLV.

***Ceiling Limit TLV for hydrogen cyanide.

****Hypothetical value. No TLV was found for 2,3,7,8-TCDD. Thus, the reviewing engineer screened this pollutant based on a hypothetical TLV of 0.001 mg/m³.

2nd Tier Screening (PAIL)

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound was deemed by the Department to be one one-hundredth of the Threshold Limit Value, as listed by the ACGIH.

Pollutant	(PAIL, µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Acrolein	2.2	0.0013	Y
Arsenic	0.1	0.022	Y
Benzene	15.9	0.0057	Y
Benzyl Chloride	51.7	0.0031	Y
Beryllium	0.02	0.017	Y
Cadmium	0.02	0.017	Y
Chromium	0.1	0.022	Y
Chromium VI	0.1	0.0005	Y
Cobalt	0.2	0.0005	Y
Cyanide	51.9	0.0108	Y
Dimethyl Sulfate	5.1	0.0003	Y

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Pollutant	(PAIL, $\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Formaldehyde	3.6	1.66	Y
Hydrogen Chloride	74.5	5.12	Y
Hydrogen Fluoride	24.5	0.64	Y
Manganese	2.0	0.24	Y
Mercury	0.1	0.022	Y
Methyl Hydrazine	0.1	0.0008	Y
Nickel	1.0	0.24	Y
POM	2.0	0.24	Y
Selenium	2.0	0.24	Y
2,3,7,8-TCDD	0.01	0.0000812	Y
Lead	0.5	0.22	Y
N ₂ O	900.2	3.54	Y

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled , etc)
SN-01	Coal Fired: NSPS Limits AP-42 (Tables 1.1-4, 1.1-5, 1.1-13, 1.1-14, 1.1-15, 1.1-17 and 1.1-18) Fuel Oil Fired: NSPS Limits Estimated Emissions AP-42 (Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, and 1.3-10)	Coal Fired: AP-42 Lead: 0.00042 lb/ton HAPs: various see AP-42 Fuel Oil Fired: AP-42 SO ₂ : 1.2 lb/MMBTU NO _x : 0.7 lb/MMBTU Lead: 9 lb/10 ¹² BTU HAPs: various see AP-42	ESP	99.5%	---

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/ uncontrolled , etc)
SN-02	Coal Fired: NSPS Limits AP-42 (Tables 1.1-4, 1.1-5, 1.1-13, 1.1-14, 1.1-15, 1.1-17 and 1.1-18) Fuel Oil Fired: NSPS Limits Estimated Emissions AP-42 (Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, and 1.3-10)	Coal Fired: AP-42 Lead: 0.00042 lb/ton HAPs: various see AP-42 Fuel Oil Fired: AP-42 SO ₂ : 1.2 lb/MMBTU NO _x : 0.7 lb/MMBTU Lead: 9 lb/10 ¹² BTU HAPs: various see AP-42	ESP	99.5%	---
SN-03	Permit Limits AP-42 13.2.4-3 Equation 1	See AP-42 13.2.4-3 Equation 1	Enclosure	50%	VOC based on 1.42% with maximum hourly of 91.5 lb/hr and annual of 300,000 lb/yr.
			Chemical Suppressant	90%	
SN-04	Permit Limits AP-42 13.2.4-3 Equation 1	See AP-42 13.2.4-3 Equation 1	Baghouse	99.9% PM 99.8% PM ₁₀	Two Silos (North and South)
			Enclosure	80% PM/PM ₁₀	
SN-05	AP-42 Tables 1.3-1, 1.3-2, 1.3-3, 1.3-8, 1.3-9, and 1.3-10	Filterable PM/PM ₁₀ : 2 lb/1000 gal Condensable PM/PM ₁₀ : 1.3 lb/1000 gal SO ₂ : 78.5 lb/1000 gal VOC: 0.252 lb/1000 gal CO: 5 lb/1000 gal NO _x : 24 lb/1000 gal Lead: 9 lb/10 ¹² BTU	N/A	N/A	---

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/ uncontrolled , etc)
		HAPs: various see AP-42			
SN-06	AP-42 13.2.4-3 Equation 1 Table 11.9-1 13.2.1.3 Equation 1 13.2.2-2 Equation 1	Various Equations Used See AP-42	Enclosures	Up to 80%	VOC based on 1.42% with maximum hourly of 91.5 lb/hr and annual of 300,000 lb/yr.
			Chemical Suppressant	90%	
			Baghouse	Up to 99.9% PM 99.8% PM ₁₀	
SN-07	Tanks	---	N/A	N/A	112,000,000 gal/yr throughput
SN-14	Tanks	---	N/A	N/A	16,000 gal/yr throughput
SN-15	Tanks	---	N/A	N/A	180,000 gal/yr throughput
SN-16	Tanks	---	N/A	N/A	16,000 gal/yr throughput
SN-17	AP-42 Table 13.4-1	PM: 0.073 lb drift/kgal PM ₁₀ : 0.073 lb drift/kgal	N/A	N/A	Based on 20,700 kgal/hr circulating water flow and a total dissolved solids content of 3,000 ppm.

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/ uncontrolled , etc)
SN-18	AP-42 Table 13.4-1	PM: 0.073 lb drift/kgal PM ₁₀ : 0.073 lb drift/kgal	N/A	N/A	Based on 20,700 kgal/hr circulating water flow and a total dissolved solids content of 3,000 ppm.
SN-20	MSDS	6.8 lb VOC/gal	N/A	N/A	1 gal/hr 3,000 gal/yr

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
01 and 02	CO	10	Every 5 years	To demonstrate compliance with CO emission rates.
01 and 02	PM	5 and 202	Every 5 years	To demonstrate compliance with PM emission rates.
01 and 02	PM ₁₀	201A and 202	Every 5 years	To demonstrate compliance with PM ₁₀ emission rates.

14. MONITORING OR CEMS

The permittee must monitor the following parameters with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and the need for records included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
01 & 02	SO ₂ CO ₂ NO _x Opacity	CEMS	Continuously	Y

* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)

** Indicates whether the parameter needs to be included in reports.

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
01, 02	SO ₂ hourly emissions	10,440.0 lb/hr	Continuousl y	Y
01, 02	SO ₂ Emissions	1.2 lb/MMBtu	Continuousl y	Y
01, 02	NO _x hourly emissions	6,090.0 lb/hr	Continuousl y	Y
01, 02	NO _x Emissions	0.7 lb/MMBtu	Continuousl y	Y
01, 02	Opacity	20%	Continuousl y	Y
01, 02	Quarterly Reports	N/A	Quarterly	Y
01, 02	Operating Scenario Log	N/A	As Needed	N
01, 02	SO ₂ annual emissions	91,454.4 tpy	Monthly	Y
01, 02	NO _x annual emissions	53,348.4 tpy	Monthly	Y
01, 02	Heat Input	N/A	Hourly	N
01, 02	Coal Sulfur and Ash Contents and Calculations	See Specific Condition #26	Annually	N
01, 02, 05	Sulfur Content of fuel oil	0.5% by weight	Per shipment	N
05	Opacity	20%	Weekly	N

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SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
06A	Opacity	20%	Weekly	N
06B	Opacity	5% off-site	Weekly	N
03 & 06A	Dust Suppressant Chemical Foam Spray Usage	300,000 lb/yr	monthly	Y
03 & 06A	MSDS for VOC Content of Chemical Foam Spray	1.42% by weight	as needed	N
03 & 06A	MSDS for HAP Content of Chemical Foam Spray	no HAPs	as needed	N
06	Fly ash trucks vehicle miles traveled on paved roads	19,440 VMT/yr	Monthly	Y
06	Fly ash trucks vehicle miles traveled on unpaved roads	9,720 VMT/yr	Monthly	Y
06	Operation of Coal Yard Dozers	12,000 hours per yr (combined)	Monthly	Y
06	Water wagon hours of operation	4,000 hours/yr	Monthly	Y
06	Cat Scraper hours of operation	1,500 hours/yr	Monthly	Y
04	Opacity	20%	Daily	Y
04	Log of baghouse maintenance inspections	N/A	Semi-annually	N
07	Fuel Oil Throughput	112,000,000 gal/yr	Monthly	Y
14	Fuel Throughput	16,000 gallons/yr	Monthly	Y
15	Fuel Throughput	180,000 gallons/yr	Monthly	Y
16	Fuel Throughput	16,000 gallons/yr	Monthly	Y
17, 18	Total dissolved solids	3,000 ppm	Weekly	N
17, 18	Circulating water	20,700 kgal/hr	Annually	N
20	MSDS for VOC content	6.8 lb/gal	As Needed	N
20	Solvent Throughput	3,000 gal/yr	Monthly	Y
Plant wide	Coal Throughput	9.2 million tons/yr	Monthly	Y

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01, 02	20%, 27%	NSPS limit, Department Guidance	COM
01, 02	20%, 60%	State limit	COM
01, 02	20%	CAM (1-hr and 3-hr averages)	COM
03	20%	Department Guidance	Water/Chemical Foam Spray
04	20%	Department Guidance	Daily Observation
05	20%	Department Guidance	Weekly Observation
06A	20%	Department Guidance	Weekly Observation
06B	5% off-site	Department Guidance	Weekly Observation
17, 18	20%	Department Guidance	Operate within Design Specification

17. DELETED CONDITIONS:

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
Plantwide #7	Similar to General Provision #7
SC #4	This condition stated the NSPS limit of 1.2 lb/MMBtu for SO ₂ . This condition was deleted because Specific Condition #3c already states the SO ₂ NSPS limit.
SC #5	This condition stated the NSPS limit of 0.1 lb/MMBtu for PM. This condition was deleted because Specific Condition #3a already states the PM NSPS limit.
SC #6	This condition stated the NSPS limit of 0.7 lb/MMBtu for NO _x . This condition was deleted because Specific Condition #3d already states the NO _x NSPS limit.

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

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19. CONCURRENCE BY:
The following supervisor concurs with the permitting decision:
-
- Lyndon Poole, P.E.