



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch



AMENDMENT TO AIR QUALITY PERMIT

Permit Amendment No.
4911-303-0051-P-01-1

Effective Date of Amendment
NOV 18 2011

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 4911-303-0051-P-01-0 issued on April 8, 2010 to:

Facility Name: Plant Washington

Mailing Address: 3625 Cumberland Blvd., Suite 1525
Atlanta, GA 30339

Facility Location: Mayview Road
Sandersville, Georgia 31082 (Washington County)

for the following: To construct and operate a 850 MW coal fired power plant.

is hereby amended as follows: Add case-by-case Maximum Achievable Control Technology (MACT) requirements for organic and non-mercury metal hazardous air pollutants (HAPs).

Reason for Amendment: Application No. 20397 dated April 18, 2011

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 11 page(s).

This Permit Amendment is effective from the date first above written and is hereby made a part of Permit No. 4911-303-0051-P-01-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.

Director
Environmental Protection Division

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2. Allowable Emissions

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

MODIFIED CONDITIONS

- 2.13 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from Coal Fired Boiler S1, any gases which
- a. Contain Nitrogen Oxides (NO_x) in excess of 0.050 lb/MMBtu on a 30-day rolling average.
[40 CFR 52.21(j); 391-3-1-.02(2)(d)(4) (subsumed) and 40 CFR 60.44Da(e)(1) (subsumed)]
 - b. Contain Carbon Monoxide (CO) in excess of 0.10 lb/MMBtu on a 30-day rolling average.
[40 CFR 52.21(j)]
 - c. Contain Carbon Monoxide (CO) in excess of 0.30 lb/MMBtu on a 1-hour average.
[40 CFR 52.21(j)]
 - d. Contain Filterable PM/PM₁₀ in excess of 0.010 lb/MMBtu on a 24-hour rolling average.
[40 CFR 52.21(j); 391-3-1-.02(2)(d)(2) (subsumed) and 40 CFR 60.42Da(c) (subsumed)]
 - e. Contain Total PM/PM₁₀ in excess of 0.018 lb/MMBtu on a 3-hour average and Total PM_{2.5} in excess of 0.0123 lb/MMBtu on a 3-hour average.
[40 CFR 52.21(j)]
 - f. Contain Sulfur Dioxide (SO₂) in excess of 0.052 lb/MMBtu on a 12-month rolling average.
[40 CFR 52.21(j) and 391-3-1-.02(2)(g) (subsumed)]
 - g. Contain Sulfur Dioxide (SO₂) in excess of 0.069 lb/MMBtu on a 30-day rolling average.
[40 CFR 52.21(j); 391-3-1-.02(2)(g) (subsumed) and 40 CFR 60.43Da(i)(l) (subsumed)]
 - h. Contain Sulfur Dioxide (SO₂) in excess of 959 lb/hr on a 3-hour rolling average.
[40 CFR 52.21(j)]
 - i. Contain Volatile Organic Compounds (VOC) in excess of 0.0024 lb/MMBtu on a 3-hour average.
[40 CFR 52.21(j)]
 - j. Contain Lead (Pb) in excess of 1.6×10^{-5} lb/MMBtu on a 3-hour average.
[40 CFR 52.21 Avoidance]
 - k. Contain Fluorides (as HF) in excess of 1.40×10^{-4} lb/MMBtu on a 3-hour average.
[40 CFR 52.21(j) and 40 CFR 63 Subpart B]
 - l. Contain Sulfuric Acid Mist (H₂SO₄) in excess of 0.004 lb/MMBtu on a 3-hour average.
[40 CFR 52.21(j)]

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- m. Contain Mercury (Hg) in excess of 7.64×10^{-6} lb/MW-hr (gross) on a 12-month rolling average while firing sub-bituminous coal or a computed weighted average on a 12-month rolling average based on the proportion of energy output in gross MW output contributed by each coal rank (sub-bituminous and bituminous) and its applicable Hg emissions limit while firing up to a 50/50 blend of sub-bituminous and bituminous coal. Hg emission limit of 6.0×10^{-6} lb/MW-hr (gross) shall be used for bituminous coal to calculate computed weighted average.
[40 CFR 63 Subpart B and 391-3-1-.02(2)(ttt)]
- n. Contain Hydrogen Chloride (HCl) in excess of 3.22×10^{-4} lb/MMBtu on a 3-hour average while firing sub-bituminous coal or a computed weighted average based on the proportion of MMBtu input contributed by each coal rank (sub-bituminous and bituminous) and its applicable HCl emissions limit while firing up to a 50/50 blend of sub-bituminous and bituminous coal. HCl emission limit of 2.4×10^{-3} lb/MMBtu shall be used for bituminous coal to calculate computed weighted average.
[40 CFR 63 Subpart B]
- o. Exhibit greater than 20 percent opacity on a 6-minute average except for one 6-minute period per hour of not more than 27 percent opacity.
[40 CFR 60.42Da(b) and 391-3-1-.02(2)(d)(3)]
- p. Contain Sulfur Dioxide (SO₂) in excess of 0.08 lb/MMBtu on a 24-hour rolling average.
[40 CFR 52.21(m)]
- q. Contain Filterable PM_{2.5} in excess of 0.00636 lb/MMBtu on a 3-hour average.
[40 CFR 52.21(j)]
- r. Contain Nitrogen Oxides (NO_x) in excess of 0.030 lb/MMBtu on a 12-month rolling average while firing sub-bituminous coal or a computed weighted average on a 12-month rolling average based on the proportion of MMBtu input contributed by each coal rank (sub-bituminous and bituminous) and its applicable NO_x emissions limit while firing up to a 50/50 blend of sub-bituminous and bituminous coal. NO_x emissions limit of 0.044 lb/MMBtu shall be used for bituminous coal to calculate computed weighted average. This condition becomes effective 6 months after initial start-up of Coal Fired Boiler S1, absent approval by the Division for an extension of this date.
[40 CFR 52.21(j)]
- s. **Contain Total PM in excess of 0.050 lb/MW-hr (gross) on a 3-hour average.**
[40 CFR 63 Subpart B]

NEW CONDITION

- 2.39 The Permittee shall establish an operating PM filterable limit (in units of mg/dscm concentration basis, 30-day average) **from Coal Fired Boiler S1**, for demonstrating ongoing compliance with the emissions limits for non-mercury metal HAPs during performance testing for initial PM compliance. The operating limit shall be the highest of the PM filterable monitoring results from the PM CEMS (mg/dscm concentration basis) during the performance test (that demonstrate compliance with Condition 2.13.s) required by Condition 6.3.i. The Permittee shall reestablish this operating limit based on subsequent testing required once every 5 years per Condition 6.3.j.
[40 CFR 63 Subpart B]

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5. Monitoring

MODIFIED CONDITIONS

5.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

- a. A Continuous Emissions Monitoring System (CEMS) for measuring NO_x emissions discharged to the atmosphere from the Coal Fired Boiler, S1. The 1-hour average NO_x emissions rates shall also be recorded in pound per million Btu heat input.
[40 CFR 52.21; 40 CFR 60.49Da(c)(1) and 391-3-1-.02(6)(b)1]
- b. A Continuous Emissions Monitoring System (CEMS) for measuring SO₂ emissions from the Coal Fired Boiler, S1 at both the inlet and outlet of the SO₂ control device. The 1-hour average SO₂ emissions rates shall also be recorded in pound per million Btu heat input.
[40 CFR 52.21; 40 CFR 63 Subpart B; 40 CFR 60.49Da(b) and 391-3-1-.02(6)(b)1]
- c. A Continuous Emissions Monitoring System (CEMS) for measuring Filterable Particulate matter emissions discharged to the atmosphere from the Coal Fired Boiler, S1. The 1-hour average Filterable Particulate matter emissions rates shall also be recorded in pound per million Btu heat input.
[40 CFR 52.21; 40 CFR 63 Subpart B; 40 CFR 60.48Da(p) and 391-3-1-.02(6)(b)1]
- d. A Continuous Emissions Monitoring System (CEMS) for measuring CO emissions discharged to the atmosphere from the Coal Fired Boiler, S1. The 1-hour average CO emissions rates shall also be recorded in pound per million Btu heat input.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
- e. For the purpose of this Permit, a valid hour of emissions data means any 60-minute period commencing on the hour and it must be based on at least 30 minutes of operation and include at least 2 data points representing two 15-minute periods.
[391-3-1-.02(6)(b)1]
- f. A Continuous Monitoring System for measuring oxygen or carbon dioxide at each location where SO₂, PM, CO or NO_x emission monitors are required.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
- g. A Continuous Emissions Monitoring Systems (CEMS) for measuring Mercury emissions discharged to the atmosphere from the Coal Fired Boiler, S1. The 1-hour average Mercury emissions rates shall also be recorded in pound per MW-hr electrical output.
[40 CFR 52.21; 40 CFR 63 Subpart B and 391-3-1-.02(6)(b)1]

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- h. If at any time prior to the commencement of operations of the facility, the Division determines that a Continuous Emissions Monitoring System (CEMS) exists that can reliably and accurately measure hydrochloric acid and/or hydrogen fluoride emissions from the Coal Fired Boiler S1 in the operating concentrations required by this permit, then the Permittee shall install such device(s) no later than 12 months following receipt of written notice from the Division or prior to the startup of the Coal Fired Boiler, S1, whichever is later. Any written notice from the Division shall include the basis (e.g., example installations) supporting the Division's determination. The CEMS(s) shall measure and record the hydrochloric acid and/or hydrogen fluoride emissions discharged to the atmosphere from the Coal Fired Boiler, S1. The one-hour average hydrochloric acid emissions and/or hydrogen fluoride rates shall also be recorded in pound per million Btu heat input.
[391-3-1-.02(6)(b)1]

6. Performance Testing

MODIFIED CONDITIONS

- 6.2 The methods for the determination of compliance with emission limits listed under Section 2.0 are as follows:
- a. Method 1 shall be used for the determination of sample point locations,
 - b. Method 2 shall be used for the determination of stack gas flow rate,
 - c. Method 3 shall be used for the determination of stack gas molecular weight,
 - d. Method 3B shall be used for the determination of the emissions rate correction factor or excess air, Method 3A may be used as an alternative,
 - e. Method 4 shall be used for the determination of stack gas moisture,
 - f. Method 5 or Method 17, as applicable, shall be used for the determination of Particulate Matter concentration from the Material Handling and Storage Facilities,
 - g. Method 5 or Method 17, as applicable in conjunction with Method 202 shall be used for the determination of total PM/PM₁₀ concentration,
 - h. Method 5 or Method 17, as applicable in conjunction with Method 202 shall be used for the determination of total PM_{2.5} concentration until the Director approves a test method for the determination of PM_{2.5},
 - i. Method 7 or 7E for the determination of nitrogen oxide concentration from the Auxiliary Boiler, S45,
 - j. Method 8 or CTM 013 shall be used for the determination of sulfur acid mist emissions,
 - k. Method 9 and the procedures contained in Section 1.3 of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants shall be used for the determination of opacity,
 - l. Method 10 shall be used for the determination of carbon monoxide concentration,

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- m. Method 19 shall be used for the determination of particulate matter, carbon monoxide, sulfur dioxide, and nitrogen oxides emission rates and to determine sulfur dioxide removal efficiency,
- n. Method 25A shall be used to determine total organic compounds and to calculate volatile organic compound emissions,
- o. Method 18 shall be used for the determination of methane emissions,
- p. Method 26A shall be used for the determination of hydrogen fluoride and hydrogen chloride emissions,
- q. Method 29 shall be used for the determination of lead emissions,
- r. Method 22 shall be used for the determination of fugitive emissions from Material Handling Sources,
- s. Compliance with the NO_x limits in Condition 2.13.a and 2.13.r, SO₂ limits in Condition 2.13.f, 2.13.g, 2.13.h and 2.13.p and the removal efficiency for Wet Limestone Scrubber in Condition 2.14 shall be determined using the CEMS required by Condition 5.2.
[40 CFR 63 Subpart B; 40 CFR 52.21; 40 CFR 60.49Da and 391-3-1-.02(6)(b)1]
- t. Compliance with the CO limit in Condition 2.13.c shall be determined using the CEMS required by Condition 5.2.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
- u. Compliance with the filterable PM limit in Condition 2.13.d shall be determined using the CEMS required by Condition 5.2.
[40 CFR 52.21; 40 CFR 60.48Da(p) and 391-3-1-.02(6)(b)1]
- v. [Reserved]
- w. Compliance with the mercury limit in Condition 2.13.m shall be determined using the CEMS required by Condition 5.2.
[40 CFR 63 Subpart B; 40 CFR 52.21 and 391-3-1-.02(6)(b)1]
- x. **Compliance with the filterable PM limit in Condition 2.39 shall be determined using the CEMS required by Condition 5.2.**
[40 CFR 63 Subpart B]

Minor changes in methodology may be specified or approved by the Director or his/her designee when necessitated by process variables, changes in facility design, or improvement or corrections, which, in his opinion, render those methods or procedures, or portions thereof, more reliable.
[391-3-1-.02(3)(a)]

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- 6.3 Within 60 days after achieving the maximum production rate on each coal type (sub-bituminous coal and a 50/50 blend of sub-bituminous and bituminous coal) in Coal Fired Boiler S1, but not later than 180 days after the initial startup of the boiler, the Permittee shall conduct the following performance tests and furnish to the Division a written report of the results of such performance tests:
[391-3-1-.02(3)]
- a. Performance test on Coal Fired Boiler S1, for volatile organic compounds at base load and at 50 percent load to verify compliance with Condition 2.13.i.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
 - b. Performance tests on Coal Fired Boiler S1, for PM/PM₁₀ to verify compliance with Condition 2.13.e.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
 - c. Performance tests on Coal Fired Boiler S1, for PM_{2.5} to verify compliance with Conditions 2.13.e and 2.13.q.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
 - d. Performance test on Coal Fired Boiler S1, for fluoride emissions (as HF) to verify compliance with Condition 2.13.k.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
 - e. Performance test on Coal Fired Boiler S1, for sulfuric acid mist to verify compliance with Condition 2.13.l.
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
 - f. Performance test on Coal Fired Boiler S1, for hydrochloric acid to verify compliance with Condition 2.13.n.
[391-3-1-.02(6)(b)1]
 - g. Performance test on Coal Fired Boiler S1, for lead to verify compliance with Condition 2.13.j.
[40 CFR 52.21 avoidance and 391-3-1-.02(6)(b)1]
 - h. In addition to the initial performance tests, the Permittee shall conduct performance tests as described in Condition 6.3.a. through 6.3.g. on an annual basis.
 - i. Performance test on Coal Fired Boiler S1, for total PM to verify compliance with Condition 2.13.s.**
 - j. In addition to the initial performance test, the Permittee shall conduct performance tests as described in Condition 6.3.i on a 5-year basis. The performance test done in accordance with Condition 6.3.b may be used to satisfy this requirement.**

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7. Notification, Reporting and Record Keeping Requirements

Record Keeping Requirements

MODIFIED CONDITIONS

7.7 The Permittee shall determine compliance with the PM Filterable emissions limitations in Condition No. 2.13.d using emissions data acquired by the PM CEMS. The 24-hour rolling average shall be determined as follows:

[40 CFR 52.21 and 391-3-1-.02(6)(b)1]

- a. After the first 24-hour average, a new 24-hour rolling average shall be calculated after each operating hour.

These records (including calculations) shall be maintained as part of the monthly records suitable for inspection or submittal.

7.8 The Permittee shall determine compliance with the CO emissions limitations in Condition No. 2.13.b and c using emissions data acquired by the CO CEMS. The 1-hour average and 30-day rolling average shall be determined as follows:

[40 CFR 52.21 and 391-3-1-.02(6)(b)1]

- a. After the first 1-hour average, a new 1-hour average shall be calculated after each operating hour.
- b. The 30-day average shall be the average of all valid hours of CO emissions data for any 30 successive operating days.
- c. After the first 30-day average, a new 30-day rolling average shall be calculated after each operating day.
- d. For the purpose of this Permit, an operating day is a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time. It is not necessary for the fuel to be combusted continuously for the entire 24-hour period.

These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

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Reporting Requirements

7.25 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition No. 7.24 (and all others in this Condition), the following excess emissions, exceedances, and excursions shall be reported:
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]

- a. Excess emissions: (means for the purpose of this Condition and Condition No. 7.24, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition No. 7.24.

- b. Exceedances: (means for the purpose of this Condition and Condition No. 7.24, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any 30-day rolling average NO_x emission rate which exceeds 0.050 lb/MMBtu for the Coal Fired Boiler S1,
- ii. Any 1-hour average CO emission rate which exceeds 0.30 lb/MMBtu for the Coal Fired Boiler S1,
- iii. Any 30-day rolling average CO emission rate which exceeds 0.10 lb/MMBtu for the Coal Fired Boiler S1,
- iv. Any 24-hour rolling average for Filterable PM/PM₁₀ emission rate which exceeds 0.010 lb/MMBtu for the Coal Fired Boiler S1,
- v. Any 12-month rolling average sulfur dioxide emission rate which exceeds 0.052 lb/MMBtu for the Coal Fired Boiler S1,
- vi. Any 30-day rolling average sulfur dioxide emission rate which exceeds 0.069 lb/MMBtu for the Coal Fired Boiler S1,
- vii. Any 3-hour rolling average sulfur dioxide emission rate which exceeds 959 lb/hr for the Coal Fired Boiler S1,
- viii. Any 24-hour rolling average sulfur dioxide emission rate which exceeds 0.08 lb/MMBtu for the Coal Fired Boiler S1,
- ix. Any 30-day rolling average of the SO₂ removal efficiency of the Wet Limestone Scrubber, as calculated per Conditions 5.2.b and 7.6.g, which is less than 97.5 percent,
- x. Any 12-month rolling average mercury emission rate that exceeds 7.64×10^{-6} lb/MW-hr (while firing sub-bituminous coal) or the computed weighted average as per Condition 2.13.m (while firing blend of sub-bituminous and bituminous coal) for the Coal Fired Boiler S1,

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- xii. Any 12-month rolling average NO_x emission rate that exceeds 0.030 lb/MMBtu (while firing sub-bituminous coal) or the computed weighted average as per Condition 2.13.r (while firing blend of sub-bituminous and bituminous coal) for the Coal Fired Boiler S1. This condition becomes effective 6 months after initial start-up of Coal Fired Boiler S1, absent approval by the Division for an extension of this date.
 - xiii. Any time ultra low sulfur fuel oil combusted for startup in the Coal Fired Boiler S1, Auxiliary Boiler S45, Emergency Generator EG1 and Firewater Pump EP1 exceeds 0.0015 percent sulfur by weight,
 - xiv. Any twelve consecutive month period during which hours of operation of the Auxiliary Boiler exceeds 876 hours,
 - xv. Any twelve consecutive month period during which hours of operation of Emergency Generator EG1 or Firewater Pump EP1 exceed 500 hours,
 - xvi. Any hour that the Coal Fired Boiler S1, has a heat input rate that exceeds 8,300 MMBtu/hr,
 - xvii. Any 30 day rolling average for filterable PM that exceeds the limit determined in accordance with Condition 2.39 for the Coal Fired Boiler S1.**
- c. Excursions: (means for the purpose of this Condition and Condition No. 7.24, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring).
- i. Any exceedance of the PM emissions limits in Condition 2.13 is an excursion for opacity,
 - ii. Any exceedance of the SO₂ emission limits in Condition 2.13 or 2.14 is an excursion for HF and HCl,

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NEW CONDITIONS

- 7.27 The facility shall implement a work practice standard for organic HAP emissions to be conducted annually **from Coal Fired Boiler S1**, unless otherwise specified, as follows:
[40 CFR 63 Subpart B]
- a. Inspect the burners, and clean or replace any components of the burner as necessary (burner inspection can be delayed until the next scheduled unit shutdown, but each burner shall be inspected at least once every 18 months).
 - b. Inspect the flame pattern, as applicable, and make any adjustments to the burner necessary to optimize the flame pattern. The adjustment shall be consistent with the manufacturer's specifications.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
 - d. Optimize total emissions of CO and NO_x. This optimization shall be consistent with the manufacturer's specifications and the emission limits established in 2.13.
 - e. Measure the concentration in the effluent stream of CO and NO_x in ppm, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
 - f. Maintain on-site and submit, if requested by the EPD, an annual report containing the information as follows;
 1. The concentrations of CO and NO_x in the effluent stream in ppm by volume, and oxygen in volume percent, measured before and after the adjustments of the main boiler.
 2. A description of any corrective actions taken as a part of the combustion adjustment.
 3. The type and amount of fuel used over the 12 months prior to an adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period.

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- 7.28 The Permittee shall determine compliance with the PM Filterable emissions limitations established in Condition No. 2.39 using emissions data acquired by the PM CEMS. The 30-day rolling average shall be determined as follows:
[40 CFR 63 Subpart B]
- a. The 30-day average shall be the average of all valid hours of filterable PM emissions data for any 30 successive operating days.
 - b. After the first 30-day average, a new 30-day rolling average shall be calculated after each operating day.
 - c. For the purpose of this Permit, an operating day is a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time. It is not necessary for the fuel to be combusted continuously for the entire 24-hour period.

These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

- 7.29 The Permittee shall submit a written report containing the following information for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively. Reporting required by this condition shall begin at the end of the semiannual period in which initial startup is completed.
[40 CFR 63 Subpart B]
- a. A summary of the results of the performance stack tests conducted for compliance with Condition 2.13.s.
 - b. The total fuel use for coal fired boiler S1 during the reporting period.
 - c. A statement of any deviations from compliance conditions such as emission limits or operating limits pertaining to non-mercury metal HAPs.

8. Special Conditions

NEW CONDITION

- 8.3 The emission limits established by the Permittee's Case-by-Case MACT in Condition 2.13.s and/or other associated provisions may be amended as provided in 40 CFR 63.44.
[40 CFR 63 Subpart B]