

## **STATEMENT OF BASIS**

**Capitol Power  
Decatur Energy Center, LLC**  
Decatur, Alabama  
Morgan County  
712-0079

This proposed Renewal Title V Major Source Operating Permit is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above-referenced applicant has applied to renew the existing Title V Permit, which was issued on December 4, 2015. The applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents, which were submitted on April 10, 2020, and are attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

Decatur Energy Center, LLC (DEC) was issued its existing Major Source Operating Permit (MSOP) on December 4, 2015 with an effective date of January 25, 2016 and an expiration date of January 24, 2021. Per ADEM Rule 335-3-16-.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of the permit. Based on this rule, the application for renewal was due to the Department no later than June 24, 2020. Additional information was received on August 11, 2020.

The Decatur Energy Center is operated by Capital Power and is located in Decatur, Morgan County, Alabama. This facility generates approximately 700 MW of electric power for customer distribution. The significant sources of air pollutants at this facility are:

- Three 205 MW Natural Gas Fired Combined-Cycle Combustion Turbines each consisting of one combustion turbine (CT) and one heat recovery steam generator (HRSG) equipped with a 400 MMBtu/hr natural gas fired duct burner and Selective Catalytic Reduction (SCR).
- One 150 HP Diesel-fired Firewater Pump Engine

Since the last Title V permit was issued, Air Permit 712-0079-X002 was issued on February 27, 2019 for upgrades to existing CTs 1, 2, and 3. Currently, CT1 and CT2 upgrades have been completed. After the upgrade, CT1, CT2 and the associated duct burners became subject to 40 CFR Part 60, Subpart KKKK and are no longer subject to 40 CFR Part 60, Subpart GG and 40 CFR Part 60, Subpart Da. Upon completion of the upgrades to CT3, this unit will also be subject to Subpart KKKK instead of Subparts GG and Da.

## **Combined-Cycle Combustion Turbine Units**

The combined-cycle combustion turbine units fire only pipeline quality natural gas. The combustion turbines are Siemens Westinghouse Model 501FD designs with a nominal electric generation capacity of approximately 205 MW each. The CT units are equipped with Dry Low NO<sub>x</sub> Burners which reduce the NO<sub>x</sub> emissions. The NO<sub>x</sub> emissions from the combined cycle combustion turbines are controlled by the use of SCRs installed in each HRSG. The Duct Burners, manufactured by Coen, are limited to 400 MMBtu/hr per DB and also have a low NO<sub>x</sub> burner design. The DBs are intermittently fired and each is limited to 600,000 MMBtu of natural gas per 12-consecutive months. The DBs cannot operate unless the CT is in operation. Each CT is capable of being operated in a mode referred to as power augmentation. In this mode, steam is injected into the CT and increases the mass flow through the turbine. This increase in mass flow increases the electric generating capacity from the CT.

The combined-cycle combustion turbine units were subject to a Prevention of Significant Deterioration (PSD) Review in which BACT was established for NO<sub>x</sub>, CO, VOC, and PM. Combined-cycle combustion turbine 3 is currently subject to the Federal New Source Performance Standards (NSPS) contained in NSPS Subpart GG, and CT3 duct burner is subject to NSPS Subpart Da. Combined-cycle combustion turbine 1, 2, and the associated duct burners are subject to NSPS Subpart KKKK.

The estimated emissions and the associated standards for the combined-cycle combustion turbines are listed below.

### **Pre-Upgrade Requirements**

#### Emission Standards

Opacity:

- Except during startup, shutdown, and load change, visible emissions from this unit shall not exceed 10% opacity.

(ADEM Admin. Code r. 335-3-14-.04) BACT

Particulate Matter (PM):

- The combined PM emissions from the combustion turbine and duct burner shall not exceed 0.005 lb/MMBtu and 11.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

- The PM emissions from the duct burner associated with CT3 shall not exceed 0.030 lb/MMBtu.

(40 CFR 60.42Da)

*The PM emission standards apply at all times except during startup, shutdown, and load change.*

Sulfur Dioxide (SO<sub>2</sub>):

- The SO<sub>2</sub> emissions from the combustion turbine shall not exceed 150 ppmvd (at 15% O<sub>2</sub>) or a fuel sulfur limit of 0.8% by weight.

(40 CFR 60.333)

- The SO<sub>2</sub> emissions from the duct burner shall not exceed 0.20 lb/MMBtu.

(40 CFR 60.43Da)

- This unit is subject to the requirements under Phase II of the Acid Rain Program. (See Appendix A)

(ADEM Admin. Code r. 335-3-18-.01 and 40 CFR Part 73)

Nitrogen Oxides (NO<sub>x</sub>):

- The combined NO<sub>x</sub> emissions from the combustion turbine and duct burner shall not exceed 0.013 lb/MMBtu and 31.2 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

- The NO<sub>x</sub> emissions from the combustion turbine shall not exceed 112 ppmvd at 15% O<sub>2</sub>.

(40 CFR 60.332)

- The NO<sub>x</sub> emissions from the duct burner shall not exceed 1.6 lb/MW<sub>hr</sub>.

(40 CFR 60.44Da)

*The NO<sub>x</sub> emission standards apply at all time except during startup, shutdown, and load change.*

Carbon Monoxide (CO):

- The combined CO emissions from the combustion turbine and duct burner during Power Augmentation shall not exceed 0.1 lb/MMBtu and 232.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

- The CO emissions while firing the combustion turbine only shall not exceed 0.117 lb/MMBtu and 156.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

*The CO emission standards apply at all time except during startup, shutdown, and load change.*

Volatile Organic Compounds (VOC):

- The combined VOC emissions from the combustion turbine and duct burner shall not exceed 0.0131 lb/MMBtu and 30.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04)

*The VOC emission standards apply at all time except during startup, shutdown, and load change.*

### Periodic monitoring and CAM

Particulate Matter (PM) and Opacity:

Based on the expected levels of emissions as compared to the regulatory allowable emission limits, periodic monitoring of opacity and particulate matter emissions is not considered necessary. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to PM and Opacity.

Sulfur Dioxide (SO<sub>2</sub>):

As stated within the NSPS regulations for gas turbines, periodic monitoring for SO<sub>2</sub> is not required based on the requirements for the units to only burn natural gas. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to SO<sub>2</sub>.

Nitrogen Oxides (NO<sub>x</sub>):

The combined-cycle combustion turbine units are required by the current Title V and PSD permits to operate continuously on each exhaust stack a NO<sub>x</sub> continuous emission monitoring system (CEMS). The CEMS is used to demonstrate compliance with the best available control technology (BACT) emission limits, the Acid Rain Program, and the Cross-State Air Pollution Rule (CSAPR). The combined-cycle combustion turbine units meet the CAM exemption in 40 CFR 64.2(b)(1)(vi) for NO<sub>x</sub>, thereby making CAM regulation non-applicable for these units.

VOC and CO:

Based on the results of the initial compliance testing and the expected levels of emissions as compared to the regulatory allowable emission limits, no periodic monitoring of VOC and CO emissions is considered necessary. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to VOC and CO.

## Post-Upgrade Requirements

### Emission Standards

#### Opacity:

- Except during startup, shutdown, and load change, visible emissions from this unit shall not exceed 10% opacity.

(ADEM Admin. Code r. 335-3-14-.04) BACT

#### Particulate Matter (PM):

- The combined PM emissions from the combustion turbines and duct burners shall not exceed 0.005 lb/MMBtu and 11.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

*The PM emission standards apply at all times except during startup, shutdown, and load change.*

#### Sulfur Dioxide (SO<sub>2</sub>):

- These units are subject to the requirements under Phase II of the Acid Rain Program. (Attached)

(ADEM Admin. Code r. 335-3-18-.01 and 40 CFR Part 73)

- These units must not burn any fuel in the turbines which contains total potential sulfur emissions in excess of 26ng SO<sub>2</sub>/J (0.060 lb/MMBtu) heat input.

(40 CFR 60.4330(a)(2))

#### Nitrogen Oxides (NO<sub>x</sub>):

- The combined NO<sub>x</sub> emissions from the combustion turbines and duct burners shall not exceed 0.013 lb/MMBtu and 31.2 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

- The nitrogen oxide emission rates from each turbine stack shall not exceed 15 ppm (at 15% O<sub>2</sub>) or 0.43 lb/MWh of useful output. These limits apply on a 30-day rolling average basis.

(40 CFR Part 60 Subpart KKKK, Table 1)

*The NO<sub>x</sub> emission standards apply at all time except during startup,*

*shutdown, and load change.*

Carbon Monoxide (CO):

- The combined CO emissions from the combustion turbines and duct burners during Power Augmentation shall not exceed 0.1 lb/MMBtu and 232.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

- The CO emissions while firing the combustion turbine only shall not exceed 0.117 lb/MMBtu and 156.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04) BACT

*The CO emission standards apply at all time except during startup, shutdown, and load change.*

Volatile Organic Compounds (VOC):

- The combined VOC emissions from the combustion turbines and duct burners shall not exceed 0.0131 lb/MMBtu and 30.0 lb/hr.

(ADEM Admin. Code r. 335-3-14-.04)

*The VOC emission standards apply at all time except during startup, shutdown, and load change.*

Periodic monitoring and CAM

Particulate Matter (PM) and Opacity:

Based on the expected levels of emissions as compared to the regulatory allowable emission limits, periodic monitoring of opacity and particulate matter emissions is not considered necessary. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to PM and Opacity.

Sulfur Dioxide (SO<sub>2</sub>):

As stated within the NSPS regulations for gas turbines, periodic monitoring for SO<sub>2</sub> is not required based on the requirements for the units to only burn natural gas. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to SO<sub>2</sub>.

Nitrogen Oxides (NO<sub>x</sub>):

The combined-cycle combustion turbine units are required by the current Title V and PSD permits to operate continuously on each exhaust stack a NO<sub>x</sub>

continuous emission monitoring system (CEMS). The CEMS is used to demonstrate compliance with the best available control technology (BACT) emission limits, the Acid Rain Program, and the Cross-State Air Pollution Rule (CSAPR). The combined-cycle combustion turbine units meet the CAM exemption in 40 CFR 64.2(b)(1)(vi) for NO<sub>x</sub>, thereby making CAM regulation non-applicable for these units.

VOC and CO:

Based on the results of the initial compliance testing and the expected levels of emissions as compared to the regulatory allowable emission limits, no periodic monitoring of VOC and CO emissions is considered necessary. Additionally, the only control device for the CT is an SCR that is only used to control NO<sub>x</sub> emissions; therefore, CAM is not applicable to VOC and CO.

### **Expected Emissions**

Particulate Matter (PM) and Opacity:

- During initial compliance testing, the PM emission rate was approximately 0.004 lb/MMBtu while firing the duct burners which is the operating mode that should yield the highest PM emission rate. No visible emissions are expected from the unit while firing natural gas.

Sulfur Dioxide (SO<sub>2</sub>):

- Natural gas is the exclusive fuel for this unit. According to 40 CFR Part 75 Table LM-1, expected emissions from pipeline natural gas would be approximately 0.0006 lb/MMBtu.

Nitrogen Oxides (NO<sub>x</sub>):

- During the initial compliance test, the NO<sub>x</sub> emission was approximately 0.0102 lb/MMBtu which is less than the permitted allowable emissions limit of 0.013 lb/MMBtu. Quarterly CEMS reports show that DEC is in compliance with their BACT limits.

Carbon Monoxide (CO):

- During initial compliance testing, the CO emission rates from the unit were less than the permitted allowable emissions limits of 0.117 lb/MMBtu when firing the turbine only and 0.1 lb/MMBtu during times when power augmentation is in operation.

Volatile Organic Compounds (VOC):

- During initial compliance testing, the VOC emission rate from the unit were approximately 0.002 lb/MMBtu, which is less than the permitted allowable emissions limit of 0.0131 lb/MMBtu.

Hazardous Air Pollutants (HAPs):

- Using emission factors from AP-42 Tables 3.1-2a and 3.1-3 and the heat input rating of the turbine, the highest single HAP emissions rate from each unit would be 0.266 lb/hr, and the total HAP emissions rate for each unit would be 0.872 lb/hour.

Green House Gases (GHG):

- According to AP-42 Tables 3.1-2a, the expected GHG emission rate from these units would be 110 lb/MMBtu.

**Cross-State Air Pollution Rule**

- These units are subject to the applicable provisions of Cross-State Air Pollution Rule (CSAPR) to include all applicable provisions of the SO<sub>2</sub> Group 2 Trading Program requirements.

(ADEM Admin. Code r. 335-3-5-.06 through 335-3-5-.36)

- These units are subject to the applicable provisions of Cross-State Air Pollution Rule (CSAPR) to include all applicable provisions of the NO<sub>x</sub> Annual Trading Program requirements.

(ADEM Admin. Code r. 335-3-8-.07 through 335-3-8-.70)

**MACT Subpart ZZZZ – Existing Emergency Firewater Pump**

This emergency firewater pump is subject to 40 CFR Part 63, Subpart ZZZZ, because it was manufactured before the applicability dates in 40 CFR Part 60, Subpart IIII.

| <u>Source #</u> | <u>HP</u> | <u>Fuel</u> |
|-----------------|-----------|-------------|
| EP004           | 150       | Diesel      |

**NSPS Subpart IIII**

Subpart IIII applies to owners and operators of engines that commence construction after July 11, 2005, where the engines are manufactured on or after July 1, 2006. This compression ignition firewater pump was manufactured before April 1, 2006; therefore, Subpart IIII does not apply.

(40 CFR Part 60, Subpart IIII, §60.4200(a)(3))

## Emission Standards

### ADEM Admin. Code r. 335-3

- This unit shall not discharge more than one 6-minute average of particulate emissions of an opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.

(ADEM Admin. Code r. 335-3-4-.01(1))

### MACT Subpart ZZZZ

- This unit is subject to the applicable requirements listed in Table 2c of 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

(40 CFR Part 63, Subpart ZZZZ, §63.6602)

- The Permittee must operate and maintain this unit according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(40 CFR Part 63, Subpart ZZZZ, §63.6625(e)(2))

- The Permittee must install a non-resettable hour meter for this unit if one is not already installed.

(40 CFR Part 63, Subpart ZZZZ, §63.6625(f))

- This unit may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of this unit is limited to 100 hours per year. There is no time limit on the use of this unit in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. This unit may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak

shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR Part 63, Subpart ZZZZ, is prohibited.

(40 CFR Part 63, Subpart ZZZZ, §63.6640(f)(1))

### Expected Emissions

The expected emissions are based on AP-42 emission factors, manufacturer's certifications, and a maximum operation of 500 hours per year. The expected emissions of the firewater pump engine subject to Subpart ZZZZ – Existing Firewater Pump Emergency Engines are shown below:

| Pollutant                            | 150 HP Firewater Pump |      |
|--------------------------------------|-----------------------|------|
|                                      | lb/hr                 | TPY  |
| PM <sub>10</sub> / PM <sub>2.5</sub> | 0.3                   | 0.1  |
| SO <sub>2</sub>                      | 0.3                   | 0.1  |
| NO <sub>x</sub>                      | 4.7                   | 1.2  |
| CO                                   | 1.0                   | 0.3  |
| VOC                                  | 0.4                   | 0.1  |
| CO <sub>2e</sub>                     | --                    | 43.8 |

### MACT Monitoring

The Permittee shall perform the following activities:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Or utilize an oil analysis program as describe in §63.6625(i) or §636625(j).

(40 CFR Part 63, Subpart ZZZZ, Table 2c(1) & Table 2c(6) & §63.6625(i) & (j))

If an oil analysis program is utilized for a stationary compression ignition engine, the Permittee must perform the oil analysis at the same frequency specified above for changing the oil. The Permittee must at a minimum analyze the following parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new, viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or percent water content (by volume) is greater than 0.5. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later.

(40 CFR Part 63, Subpart ZZZZ, §63.6625(i))

CAM

This source is uncontrolled; therefore, CAM does not apply.

Recordkeeping and Reporting

The Permittee must keep records of the parameters that are analyzed as part of the oil analysis program and the results of the analysis if this option is chosen and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. These records shall be maintained in a manner suitable for inspection for a period of 5 years from record generation.

(40 CFR Part 63, Subpart ZZZZ, §63.6625(i) & (j))

The Permittee must keep records of the maintenance conducted on this unit in order to demonstrate that you operated and maintained this unit and after-treatment control device (if any) according to your own maintenance plan. These records shall be maintained in a manner suitable for inspection for a period of 5 years from record generation.

(40 CFR Part 63, Subpart ZZZZ, §63.6655(e))

The Permittee must keep records of the hours of operation of each engine that is recorded through the non-resettable hour meter. The facility must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. These records shall be maintained in a manner suitable for inspection for a period of 5 years from record generation.

(40 CFR Part 63, Subpart ZZZZ, §63.6655(f))

Recommendation:

Based on the above analysis and pending the resolution of any comments received during the 30-day public comment period and 45-day EPA review, I recommend issuing the attached renewal MSOP for Decatur Energy, LLC.



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Tyler Phillips  
Industrial Minerals Section  
Energy Branch  
Air Division

August 4, 2020

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Date

Appendix A  
(ACID RAIN PERMIT)

# Phase II Acid Rain Permit

Issued by: Alabama Department of Environmental Management  
Issued to: Decatur Energy Center  
Operated by: Capitol Power Corporation  
ORIS Code: 55292  
Effective: January 25, 2021 through January 24, 2026

## Acid Rain Permit Contents

- 1) Statement of Basis
- 2) SO<sub>2</sub> allowances allocated under this permit and NO<sub>x</sub> requirements for each affected unit.
- 3) Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process and any additional requirements or conditions.
- 4) The Phase II Permit Application submitted for this source. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the Phase II Permit Application.
- 5) Summary of Previous Actions and Current Action.

**1) Statement of Basis:**

Statutory and Regulatory Authorities: In accordance with the Code of Alabama 1975, §§ 22-22A-4, 22-22A-6, 22-22A-8, 22-28-14, and Titles IV and V of the Clean Air Act, the Alabama Department of Environmental Management issues this permit pursuant to ADEM Admin. Codes 335-3-16 and 335-3-18.

**2) SO<sub>2</sub> Allowance Allocations and NO<sub>x</sub> Requirements for each affected unit:**

|       |   | 2021            | 2022            | 2023            | 2024            | 2025            |
|-------|---|-----------------|-----------------|-----------------|-----------------|-----------------|
| CTG-1 | SO <sub>2</sub> allowances, under 40 CFR part 73 [tons] | NA <sup>1</sup> |
|       | NO <sub>x</sub> limit [lb/MMBtu]                        | ∞ <sup>2</sup>  |

|       |   | 2021            | 2022            | 2023            | 2024            | 2025            |
|-------|---|-----------------|-----------------|-----------------|-----------------|-----------------|
| CTG-2 | SO <sub>2</sub> allowances, under 40 CFR part 73 [tons] | NA <sup>1</sup> |
|       | NO <sub>x</sub> limit [lb/MMBtu]                        | ∞ <sup>2</sup>  |

|       |  | 2021            | 2022            | 2023            | 2024            | 2024            |
|-------|--|-----------------|-----------------|-----------------|-----------------|-----------------|
| CTG-3 | SO <sub>2</sub> allowances,<br>under 40 CFR<br>part 73<br>[tons] | NA <sup>1</sup> |
|       | NO <sub>x</sub> limit<br>[lb/MMBtu]                              | □2              | □2              | □2              | □2              | □2              |

- 1 Currently there are no SO<sub>2</sub> allowances allocated to these units by the U.S. EPA. The number of allowances allocated to Phase II affected units by U.S. EPA may change under 40 CFR Part 73. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to SO<sub>2</sub> allowance allocations identified in this permit [See 40 CFR 72.84].
- 2 40 CFR Part 76 does not establish a NO<sub>x</sub> emission rate for Combined Cycle Combustion Turbine Units CTG-1, CTG-2, and CTG-3.

**3) Comments, Notes, and Justifications:** This facility consists of three combined cycle 205 MW Natural Gas Fired Combustion Turbines each with a Natural Gas Fired 400 MMBtu/hr Duct Burner and Heat Recovery Steam Generator. The Heat Recovery Steam Generators supply steam to a nearby industrial facility and a 276 MW steam turbine.

It should be noted that the compliance certification report shall cover each calendar year in which year the unit is subject to an Acid Rain limitation.

**4) Phase II Permit Application:** Attached.

**5) Summary of Previous Actions and Current Action:**

| <b>Action</b>   | <b>Date</b>       |
|---|-------------------|
| 1. Draft permit prepared and submitted for public review and comment.         | December 29, 2000 |
| 2. Permit finalized and issued.   | February 2, 2001  |
| 3. Permit re-issued for ownership change.                                     | October 3, 2001   |
| 4. Draft permit renewal prepared and submitted for public review and comment. | March 23, 2006    |
| 5. Renewal permit finalized and issued.                                       | May 8, 2006       |
| 6. Draft permit prepared and submitted for public review and comment.         | December 10, 2010 |
| 7. Permit finalized and re-issued.  | January 25, 2011  |
| 8. Draft permit prepared and submitted for public review and comment.         | October 19, 2015  |
| 9. Permit finalized and re-issued.  | December 4, 2015  |
| 10. Draft permit prepared and submitted for public review and comment.        | TBD               |
| 11. Permit finalized and re-issued.   | TBD               |

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Ronald W. Gore, Chief  
Air Division

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Date