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trinityconsultants.com

Trinity
Consultants

June 8, 2016

Mr. Bachir Bouzid
NJDEP – Air Quality Permitting and Planning
Bureau of Stationary Sources
Operating Permits Section
401 E. State Street, 2nd Floor
P.O. Box 420, Mail Code 401-02
Trenton, NJ 08625-0420

RE: *Woodbridge Energy Center (PI No. 18940)*
Title V Operating Permit Renewal Application

Dear Mr. Bouzid:

On behalf of the Woodbridge Energy Center, Trinity Consultants, Inc. (Trinity) is submitting the attached Title V Air Operating Permit Renewal Package for the referenced facility. The Operating Permit Renewal Application consists of the following:

- Cover letter;
- RADIUS file;
- Attachment to the RADIUS Operating Permit Renewal Application;
- Acid Rain Renewal Application.

A Compliance Assurance Monitoring (CAM) plan is not applicable for any emission unit/pollutant at this facility.

Please note that the RADIUS application includes various minor administrative type changes as discussed below.

PROPOSED PERMIT CHANGES

As part of this renewal application, the Woodbridge Energy Center is requesting that the following permit revisions/language clarifications be made to the current Title V permit:

IS2: Sulfuric Acid Storage Tank:

- Because potential H₂SO₄ emissions from the sulfuric acid tank (IS2) are minimal (less than 0.0005 lb/yr), monthly emission calculations are not justified. Therefore, WEC requests that Ref # 9 be removed from the permit. In addition, WEC is requesting that the monitoring and recordkeeping requirements associated with Ref # 1 be removed.

HEADQUARTERS >

12770 Merit Drive | Suite 900 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203

North America | Europe | Middle East | Asia

GR5: Total Annual Emissions from the Facility:

- Revise the NO_x compliance calculation in GR5 Ref #1 to reflect 0.01 lb/MMBtu and MMBtu/month (1020 Btu/scf x scf/month) for the auxiliary boiler instead of lb/hr and hr/month.
- Revise the CO compliance calculation in GR5 Ref #2 to reflect 0.0375 lb/MMBtu and MMBtu/month for the auxiliary boiler instead of lb/hr and hr/month.
- In accordance with our request to remove the monthly emissions calculation requirement for the sulfuric acid tank, please remove the monitoring requirement references to monthly H₂SO₄ emissions from IS2 (Ref #5).

U1 Combined Cycle Combustion Units 1 & 2, OS Summary:

- As demonstrated to the Department, Woodbridge Energy Center has obtained the required NO_x and VOC offsets prior to operation. As such, the offset permit requirement (U1, OS Summary, Ref #80) can be removed.
- In keeping with the previous request, the facility is requesting that all permit conditions pertaining to initial stack testing, CEMS PST testing, notification requirements, etc, be removed from the renewal permit as the requirements have been fulfilled and are no longer applicable. (Ref #1, #4, #50 – #51, #56)
- Remove the language “once initially” from Ref #8, #9 as this has been completed.
- The NO_x RACT limit of 1.3 lb/MWh (Ref # 10 and 11) is no longer applicable and has been replaced by 0.75 lb/MW-hr (Ref #12 & #13) and therefore, can be removed.
- Delete the requirement to submit an excess emissions and monitoring systems performance report (EEMPR) for annual ton per year NO_x and CO limits (Ref #17, 18). Any excess annual emissions will be reported in the semi-annual deviation reports.
- When calculating H₂SO₄ emissions from the combustion turbines and duct burners, the permit requires the inclusion of H₂SO₄ emissions from the sulfuric acid tank (IS2). In accordance with our request to remove the monthly emissions calculation requirement for the sulfuric acid tank, please remove the monitoring requirement references to monthly H₂SO₄ emissions from IS2 (Ref #24)
- To allow for operational flexibility, the facility is requesting that the natural gas usage requirement be deleted from the permit (Ref #37). During initial permitting of the facility, Middlesex County was designated as non-attainment for PM_{2.5}. This value was based on vendor PM_{2.5} emission guarantees and established by calculating the maximum fuel usage while still keeping facility-wide PM_{2.5} emissions below the major source threshold of 100 tpy. Since the facility was permitted, the area has been redesignated to attainment. Because stack test results for PM_{2.5} indicate that actual emissions are well below the vendor guarantees used in the calculation of maximum fuel usage, this condition restricts operation unnecessarily. No increases to annual tpy emission limits are being requested and the facility will continue to track emissions on a monthly basis.
- Since the shakedown period has been completed, please delete all references to shakedown (Ref #40 and #44).
- Revise the monitoring requirement for Ref #66 as follows:
 - Remove the reference to the initial performance test since it has already been completed; and
 - Include the alternative to use a CEMS in lieu of annual stack testing.
- WEC requests that Ref #69 be removed or clarified to reflect two combustion turbines that each have their own heat recovery but share a single steam turbine.

U1, OS1 through OS14:

- OS1/OS7. The natural gas is delivered through a pipeline. Please remove the recordkeeping requirement to maintain invoices/bills of lading per delivery of natural gas (Ref #30).
- Delete combustion turbine commissioning scenarios (U1, OS13 and OS14) as they are no longer applicable.

- The original permit application included the option to use conventional or rapid startups. Worst case potential to emit calculations and ambient air quality analyses were based on the worst case lb/hr startup and shutdown emissions. In an effort to simplify the permit and data acquisition and handling system (DAHS) programming, WEC is requesting that one set of startup and one set of shutdown operating scenarios be deleted from the permit. The permit should reflect the worst case lb/hr and durations which were previously assessed. Therefore, WEC requests that OS4, OS5, OS10 and OS11 be deleted from the permit.
- Update the definition of shutdown to better represent the definition used in the original application. Suggested language is included below:
 - U1, OS6 and OS12, Ref #3: Shutdown Period $\leq$ 30 minutes. Shutdown is defined as the period of time from initiation of lowering combustion turbine power output with the intent to cease generation of electrical power output and concludes with the cessation of the combustion turbine operation. **The shutdown period commences at the beginning of the first 15 minute consecutive period when CO and NOx emissions are greater than their steady state emission limits in U1, OS1, OS2, OS7 and OS8.**
- WEC requests that the operating scenarios be revised to reflect the different turbines as follows:
 - OS1: Turbine 1 firing natural gas at full load with natural gas fired duct burner in HRSG for supplemental firing
 - OS2: Turbine 1 firing natural gas at full load without supplemental duct burner firing in HRSG
 - OS3: Turbine 1 Start-up Operation
 - OS4: Delete per our previous request to consolidate startup and shutdown conditions to reflect worst-case operating scenario.
 - OS5: Delete per our previous request to consolidate startup and shutdown conditions to reflect worst-case operating scenario
 - OS6: Turbine 1 Shutdown Operation
 - OS7: Turbine 2 firing natural gas at full load with natural gas fired duct burner in HRSG for supplemental firing
 - OS8: Turbine 2 firing natural gas at full load without supplemental duct burner firing in HRSG
 - OS9: Turbine 2 Start-up Operation
 - OS10: Delete per our previous request to consolidate startup and shutdown conditions to reflect worst-case operating scenario
 - OS11: Delete per our previous request to consolidate startup and shutdown conditions to reflect worst-case operating scenario
 - OS12: Turbine 2 Shutdown Operation
 - OS13: Delete since shakedown period has been completed.
 - OS14: Delete since shakedown period has been completed.

U3: Gas Fired Auxiliary Boiler:

- Since the initial stack testing and notifications have been completed, please remove OS Summary, Ref #1 and #17 from the permit.
- 40 CFR part 60 does not require stack testing or opacity requirements for the natural gas fired boiler. Therefore, OS Summary Ref # 21 and #22 can be removed since they are not applicable to this unit.
- The monitoring, recordkeeping and submittal action can be revised to "None" since the initial stack testing has been completed. (OS1, Ref # 6, #8 - #13)

U4 (Fire Pump) and U5 (Emergency Diesel Generator):

- The facility requests removal of the 30 minute operating restriction for testing of the fire pump and emergency diesel generator (U4, OS Summary, Ref # 8, U5, OS Summary, Ref #8). While typical testing

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durations last for 30 minutes or less, there is no basis to include a limit on each individual maintenance test event since testing cannot exceed 100 hr/year.

- Neither the fire pump nor the emergency generator are equipped with a diesel particulate filter therefore U4 OS Summary, Ref #11 and U5, OS Summary Ref #14 can be removed.
- WEC requests the use of manufacturer design specifications in lieu of fuel flow meters as the monitoring requirement for maximum heat input associated with the diesel fire pump and emergency diesel generator (U4, OS1, Ref #5 and U5, OS1, Ref #16). Using manufacturer design specifications for maximum heat input capacity is in line with NJDEP's General Operating Permit for Emergency Generators.
- U5, OS Summary Ref #11 can be removed as the unit burns 15 ppm sulfur ULSD.
- U5, OS Summary, Ref # 13 is not applicable to the emergency generator at WEC.
- U5, OS Summary Ref #17 can be removed. The unit will only be used for emergency backup purposes.
- U5, OS1, Ref # 13 and #14 are identical, therefore, Ref # 14 can be removed since it has no monitoring, recordkeeping or submittal requirements.

U6: Cooling Tower

- WEC is unsure of the basis for the requirement in OS Summary Ref #1.
- All visible emissions from the cooling tower will consist of condensed water vapor, therefore this requirement can be removed (OS Summary Ref #2).
- Update the cooling tower chemical list (U6, OS Summary, Ref #7) to delete the use of sodium bromide and to reflect the addition of the following:
 - anti-foam
 - corrosion inhibitor and dispersant

Notification of these additional chemicals was submitted to NJDEP by letter dated August 15, 2015. The use of these chemicals does not have an impact on emissions.

- The maximum circulating water flow rate is 148,000 gallons per minute (gpm), rather than the 178,000 gpm which was the basis for the initial permit. (OS1, Ref #1, #3-#5). As a result of revising the water flow rate, TSP, PM10 and PM2.5 emission limits should be revised as follows:
 - TSP = 2.31 lb/hr
 - PM10 = 1.5 lb/hr
 - PM2.5 = 0.56 lb/hr
- Incorporate the cooling tower water PM₁₀ and PM_{2.5} fractions into the monitoring requirement for conditions U6, OS1, Ref #4 and 5 as specified in the original permit application and as indicated below:
 - PM₁₀/TSP ratio of 0.65
 - PM_{2.5}/TSP ratio of 0.24
- Remove the requirement to submit an annual particulate emission report for the cooling tower (U6, OS1, Ref # 4 - #6). This data is reported each year in the annual emissions statement.
- After a review of recent combined cycle power plant permits with cooling towers, it was determined that WEC is the only permit that includes an ORP requirement. Further, a Title V Operating Permit is not the appropriate regulatory document for inclusion of limitations or operating practices relative to the minimization of Legionella (or any bacteria). In fact, N.J.A.C. 7:27-22 (Operating Permits), indicates that the operating permits are intended to include emission limitations and standards (including operational requirements necessary to assure compliance with all applicable requirements which apply to a source operation or a group of source operations). The definition of source operation clearly refers to any process that "emits or can reasonably be anticipated to emit any air contaminant either directly or indirectly into the outdoor atmosphere." Furthermore, an air contaminant is defined as "any substance, other than water or distillates of air, present in the atmosphere as solid particles, liquid particles, vapors or gases". Considering the fact that a Title V Operating Permit is applicable to "source operations" and their emissions of "air contaminants", it is not appropriate to include compliance requirements in a Title V Operating Permit for the

minimization of bacterial growth. As such, and because an ORP and/or pH limit is not appropriate for inclusion in an air permit, conditions U6, OS1, Ref #7 and #8 should be deleted.

If you should have any questions or require further information regarding this submission, please feel free to contact Mr. Kenneth Earl, WEC Plant Manager at (732) 661-3301 or me at (407) 913-9547.

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in blue ink, appearing to read 'Carla Adduci', followed by a colon.

Carla Adduci
Managing Consultant

Attachments

ATTACHMENT 1

Attachment to the RADIUS Operating Permit Renewal Application

**New Jersey Department of Environmental Protection
Reason for Application**

Permit Being Modified

Permit Class: BOP **Number:** 160001

**Description
of Modifications:** On behalf of the Woodbridge Energy Center, Trinity Consultants, Inc. (Trinity) is submitting the attached Title V Air Operating Permit Renewal Package for the referenced facility. A Compliance Assurance Monitoring (CAM) plan is not applicable for any emission unit/pollutant at this facility.
Please note that the RADIUS application includes various minor administrative type changes as shown in the cover letter.

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Facility Name (AIMS): WOODBRIDGE ENERGY CENTER

Facility ID (AIMS): 18940

Street INDUSTRIAL HWY
Address: WOODBRIDGE, NJ

Mailing CPV SHORE INC
Address: 1070 RIVERSIDE DR
STE 300
KEASBEY, NJ 08832

County: Middlesex
Location 27.5 acre industrial parcel of land
Description:

State Plane Coordinates:	
X-Coordinate:	557,672
Y-Coordinate:	4,485,142
Units:	Other
Datum:	NAD83
Source Org.:	Submittal Document
Source Type:	Digital Image

Industry:	
Primary SIC:	
Secondary SIC:	
NAICS:	221112

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Air Permit Information Contact**Organization:** Consolidated Asset Management Services**Org. Type:** Corporation**Name:** Ryan Bullock**NJ EIN:****Title:** Compliance Specialist**Phone:** (732) 661-3305 x**Mailing Address:** 1070 Riverside Dr.**Fax:** () - xSuite 300
Keasbey, NJ 08832**Other:** () - x**Type:****Email:** rbullock@cpvwoodbridge.com

Contact Type: Consultant**Organization:** Trinity Consultants**Org. Type:** Corporation**Name:** Carla Adduci**NJ EIN:****Title:** Managing Consultant**Phone:** (407) 913-9547 x**Mailing Address:** 100 Overlook Center**Fax:** () - x2nd Floor
Princeton, NJ 08540**Other:** () - x**Type:****Email:** cadduci@trinityconsultants.com

Contact Type: On-Site Manager**Organization:** Consolidated Asset Management Services**Org. Type:** Corporation**Name:****NJ EIN:****Title:****Phone:** () - x**Mailing Address:** 1070 Riverside Dr.**Fax:** () - xSuite 300
Keasbey, NJ 08832**Other:** () - x**Type:****Email:**

**New Jersey Department of Environmental Protection
Facility Profile (General)**

Contact Type: Responsible Official

Organization: Consolidated Asset Management Services

Org. Type: Corporation

Name: Kenneth Earl

NJ EIN:

Title: Plant Manager - Woodbridge Energy Center

Phone: (732) 661-3301 x

Mailing 1070 Riverside Dr.

Fax: (732) 738-1829 x

Address: Suite 300
Keasbey, NJ 08832

Other: (732) 397-1865 x

Type:

Email: kearl@cpvwoodbridge.com

**New Jersey Department of Environmental Protection
Facility Profile (Permitting)**

- | | |
|---|-----|
| 1. Is this facility classified as a small business by the USEPA? | No |
| 2. Is this facility subject to N.J.A.C. 7:27-22? | Yes |
| 3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22? | No |
| 4. Has a copy of this application been sent to the USEPA? | No |
| 5. If not, has the EPA waived the requirement? | No |
| 6. Are you claiming any portion of this application to be confidential? | No |
| 7. Is the facility an existing major facility? | Yes |
| 8. Have you submitted a netting analysis? | No |
| 9. Are emissions of any pollutant above the SOTA threshold? | No |
| 10. Have you submitted a SOTA analysis? | No |
| 11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required | |
| | |
| 12. Have you provided, or are you planning to provide air contaminant modeling? | No |

ATTACHMENT 2

Acid Rain Renewal Application



For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ New ☐ Revised ☒ for ARP permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Woodbridge Energy Center Facility (Source) Name	NJ State	57839 (ORIS) Plant Code
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STEP 2

Enter the unit ID#
for every affected
unit at the affected
source in column "a."

[illegible]

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Sulfur Dioxide Requirements, Cont'd.**STEP 3, Cont'd.**

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.

(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission

of a new certificate of representation changing the designated representative;

STEP 3, Cont'd.

Recordkeeping and Reporting Requirements, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with

any other provision of the Act, including the provisions of title I of the Act relating

STEP 3, Cont'd.**Effect on Other Authorities, Cont'd.**

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the
certification
statement,
sign, and date.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Kenneth Earl	
Signature		Date June 8, 2016



Instructions for the Acid Rain Program Permit Application

The Acid Rain Program requires the designated representative to submit an Acid Rain permit application for each source with an affected unit. A complete Certificate of Representation must be received by EPA before the permit application is submitted to the title V permitting authority. A complete Acid Rain permit application, once submitted, is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the title V permitting authority either issues a permit to the source or disapproves the application.

Please type or print. If assistance is needed, contact the title V permitting authority.

STEP 1 A Plant Code is a 4 or 5 digit number assigned by the Department of Energy's (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, send an email to the EIA. The email address is EIA-860@eia.gov.

STEP 2 In column "a," identify each unit at the facility by providing the appropriate unit identification number, consistent with the identifiers used in the Certificate of Representation and with submissions made to DOE and/or EIA. Do not list duct burners. For new units without identification numbers, owners and operators must assign identifiers consistent with EIA and DOE requirements. Each Acid Rain Program submission that includes the unit identification number(s) (e.g., Acid Rain permit applications, monitoring plans, quarterly reports, etc.) should reference those unit identification numbers in exactly the same way that they are referenced on the Certificate of Representation.

Submission Deadlines

For new units, an initial Acid Rain permit application must be submitted to the title V permitting authority 24 months before the date the unit commences operation. Acid Rain permit renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a title V permit, or such longer time as provided for under the title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form to the appropriate title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional Acid Rain contact, or call EPA's Acid Rain Hotline at (202) 343-9620.

Paperwork Burden Estimate

The public reporting and record keeping burden for this collection of information is estimated to average 8 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**