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APR 24 2009

STATE OF ILLINOIS  
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

HOLLAND ENERGY, LLC, )  
)  
Petitioner, )  
)  
v. )  
)  
ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
)  
Respondent. )

PCB 09 - 96  
(CAAPP Permit Appeal)

NOTICE OF FILING

TO: Clerk  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601  
**(VIA HAND DELIVERY)**

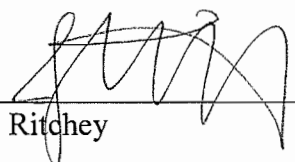
**(PERSONS ON ATTACHED SERVICE LIST)**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an original and nine copies each of an **ENTRY OF APPEARANCE OF JOAN RITCHEY, PETITION FOR REVIEW** and **OPEN WAIVER OF STATUTORY DECISION DEADLINES**, copies of which are herewith served upon you.

Respectfully submitted,

HOLLAND ENERGY, LLC,  
Petitioner,

Dated: April 24, 2009

By:   
Joan Ritchey

Joan Ritchey  
ICE MILLER LLP  
200 W. Madison Street  
Suite 3500  
Chicago, IL 60606-3417  
(312) 726-1567

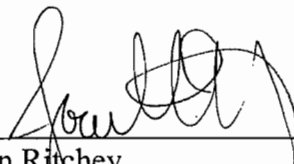
**CERTIFICATE OF SERVICE**

I, Joan Ritchey, the undersigned, hereby certify that I have served the attached ENTRY OF APPEARANCE OF JOAN RITCHEY, PETITION FOR REVIEW and OPEN WAIVER OF STATUTORY DECISION DEADLINES upon:

Clerk of the Board  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 62794-9276

by depositing said documents in the United States Mail, in Chicago, Illinois this 24<sup>th</sup> day of April, 2009.

  
\_\_\_\_\_  
Joan Ritchey

I/2319496.1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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CLERK'S OFFICE

APR 24 2009

STATE OF ILLINOIS  
Pollution Control Board

HOLLAND ENERGY, LLC, )  
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PCB 09-96  
(CAAPP Permit Appeal)

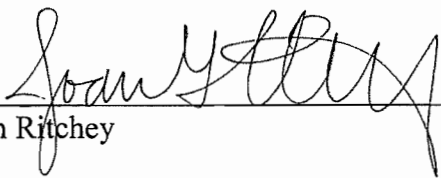
ENTRY OF APPEARANCE OF JOAN RITCHEY

NOW COMES Joan Ritchey, of the law firm of ICE MILLER LLP, and hereby enters her appearance on behalf of Petitioner, Holland Energy, LLC.

Respectfully submitted,

HOLLAND ENERGY, LLC,  
Petitioner,

Dated: April 24, 2009

By:   
Joan Ritchey

Joan Ritchey  
ICE MILLER LLP  
200 W. Madison Street  
Suite 3500  
Chicago, IL 60606-3417  
(312) 726-1567

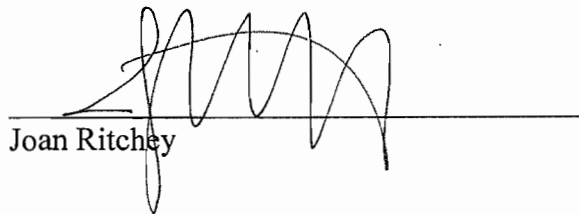
**CERTIFICATE OF SERVICE**

I, Joan Ritchey, the undersigned, hereby certify that I have served the attached ENTRY OF APPEARANCE OF JOAN RITCHEY upon:

Clerk of the Board  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 62794-9276

by depositing said documents in the United States Mail, in Chicago, Illinois this 24<sup>th</sup> day of April, 2009.

  
Joan Ritchey

I/2319533.1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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APR 24 2009

STATE OF ILLINOIS  
Pollution Control Board

HOLLAND ENERGY, LLC, )  
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PCB 09-96  
(CAAPP Permit Appeal)

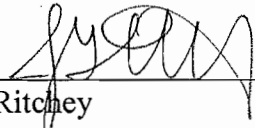
OPEN WAIVER OF STATUTORY DECISION DEADLINES

Petitioner, Holland Energy, LLC ("Holland Energy"), pursuant to Ill. Admin. Code 101.308(c)(1), hereby notifies the Illinois Pollution Control Board (the "Board") and the Illinois Environmental Protection Agency that it waives the Board's statutory decision deadline completely and unequivocally until it elects to reinstate the 120-day decision period by filing with the Board a notice to reinstate.

Respectfully submitted,

HOLLAND ENERGY, LLC,  
Petitioner,

Dated: April 27, 2009

By:   
Joan Ritchey

Joan Ritchey  
ICE MILLER LLP  
200 W. Madison Street  
Suite 3500  
Chicago, IL 60606-3417  
(312) 726-1567

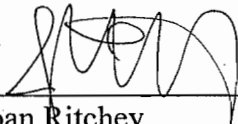
**CERTIFICATE OF SERVICE**

I, Joan Ritchey, the undersigned, hereby certify that I have served this OPEN WAIVER OF STATUTORY DECISION DEADLINES upon:

Clerk of the Board  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 62794-9276

by depositing said document in the United States Mail, in Chicago, Illinois this 24<sup>th</sup> day of April, 2009.

  
\_\_\_\_\_  
Joan Ritchey

I/2319783.1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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APR 24 2009

STATE OF ILLINOIS  
Pollution Control Board

HOLLAND ENERGY, LLC, )  
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Petitioner, )  
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ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
)  
Respondent. )

PCB 09-96  
(CAAPP Permit Appeal)

PETITION FOR REVIEW

NOW COMES Petitioner, Holland Energy, LLC ("Holland Energy") by and through its attorneys, ICE MILLER LLP, pursuant to Section 40.2 of the Illinois Environmental Protection Act, 415 ILCS 5/40.2 (the "Act"), and 35 Ill. Admin. Code § 105, Subpart C, and petitions the Illinois Pollution Control Board (the "Board") for review of the Clean Air Act Permit Program ("CAAPP") permit granted to Holland Energy on March 20, 2009, by the Illinois Environmental Protection Agency ("Illinois EPA"), pursuant to Section 39.5 of the Act.

In support thereof and in compliance with 35 Ill. Admin. Code § 105.304, Holland Energy states as follows:

1. This Petition is being filed within 35 days after Illinois EPA's final permit action, which took place on March 20, 2009, so this Petition is timely filed. 35 Ill. Admin. Code § 105.302(e).

2. Holland Energy owns and operates a power plant located at Rural Route 2, 270-A, Beecher City, Shelby County, Illinois. This CAAPP source operates two natural gas-fired combustion turbines/heat recovery steam generators with duct burners to generate electrical power, with other ancillary operations. (The subject CAAPP source is referred to herein as the

"Facility".) The Facility is classified as a "major source" for purposes of Title V of the Federal Clean Air Act and Section 39.5 of the Act.

3. On January 11, 2008, Holland Energy submitted a renewal application for its CAAPP permit. At that time, Holland Energy was owned by TPF General Holdings LLC.

4. On or about October 15, 2008, the Illinois EPA sent to public notice a proposed CAAPP permit for the Facility. The public notice period ended on November 14, 2008 and no public comments or comments from "affected states" were received. Illinois EPA provided a copy of the proposed permit to the United States Environmental Protection Agency ("U.S. EPA") on January 30, 2009; Illinois EPA received no written objection from U.S. EPA.

5. Hoosier Energy and Wabash Valley Power became the owners of Holland Energy on or about January 7, 2009. Holland Energy therefore has standing to file this Petition.

6. Holland Energy has initiated a dialogue with Illinois EPA about the issues raised in this Petition (see the April 20, 2009 letter attached hereto as Exhibit "A"), and is filing this appeal to protect its appeal rights in the event Illinois EPA and Holland Energy do not resolve the issues raised herein. Holland Energy is filing contemporaneously herewith an Open Waiver Of Statutory Decision Deadlines so that the parties may continue to attempt to resolve the issues raised by Holland Energy without the involvement of the Board.

7. The specific issues raised by the Petition are:

(a) The 28 issues identified in Exhibit "A" hereto, which are incorporated as if set forth herein;

(b) Section 3.2, Compliance with Applicable Requirements: Section 3.2.1 of the Facility's prior permit contained requirements for each cold cleaning degreaser at the Facility as required by 35 Ill. Admin. Code 215.182, but these requirements are not included in the



renewal permit. The cold cleaning degreasers remain at the Facility and the Facility does utilize VOC-containing solvents in them, so that the requirements found in 35 Ill. Admin. Code 215.182 should be added to the renewal permit.

8. To the extent they are not explained in Exhibit "A", Holland Energy's justification as to why Illinois EPA's decisions on these issues are in error fall into four categories:

- (a) The facts and citations stated in the permit are incorrect;
- (b) The permit conditions are not clear and clarification is required;
- (c) The permit mistakenly includes requirements that, per the regulations themselves, are not applicable to this Facility. Holland Energy points out that this is a combined cycle facility, not a simple cycle peaking facility, and that the Facility is not located in a "major metropolitan area."
- (d) Certain insignificant activities are incorrectly designated as significant activities.

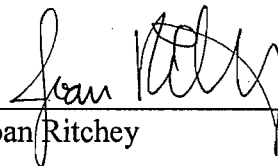
9. In accordance with the Board's decision in AmerenEnergy Generating Company, Edwards Power Station v. Illinois EPA, PCB No. 06-67 (CAAPP Permit Appeal -- Air), February 16, 2006, Holland Energy understands that its renewal permit is stayed with the filing of this Petition and that Holland Energy should continue to comply with its prior permit at this time.

WHEREFORE, Holland Energy, LLC petitions the Illinois Pollution Control Board to review the Illinois EPA's action to issue its CAAPP permit in this fashion.

Respectfully submitted,

HOLLAND ENERGY, LLC,  
Petitioner,

Dated: April 24, 2009

By:   
Joan Ritchey

Joan Ritchey  
ICE MILLER LLP  
200 W. Madison Street  
Suite 3500  
Chicago, IL 60606-3417  
(312) 726-1567

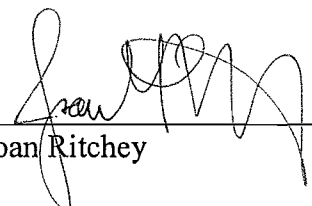
**CERTIFICATE OF SERVICE**

I, Joan Ritchey, the undersigned, hereby certify that I have served this PETITION FOR REVIEW upon:

Clerk of the Board  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 62794-9276

by depositing said document in the United States Mail, in Chicago, Illinois this 24<sup>th</sup> day of April, 2009.

  
Joan Ritchey

# HollandEnergy

OWNED BY Hoosier Energy  
& Wabash Valley Power

Your Touchstone Energy® Cooperatives 

Sent via email

Illinois Environmental Protection Agency  
Permits Section  
Bureau of Air  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
Attn: Michael Reed, CAAP Unit Manager

April 20, 2009

**RE: HOLLAND ENERGY, LLC**  
**Comments regarding Title V permit renewal issues March 20, 2009**

Dear Mr. Reed:

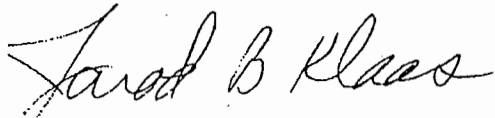
We are please to have the opportunity to provide you with the following list of questions/concerns regarding the above referenced permit. We appreciate your offer to open a dialogue to discuss these important issues and look forward to working with you.

We realize that time is limited to resolve these issues prior to the April 24<sup>th</sup> deadline to file an appeal and wish to make every effort to avoid that avenue. As such we will make every effort to be available to discuss the attached list of concerns with IEPA staff. I may be reached at the following:

(317)481-2838 Office  
(317)439-2932 Cell  
[j\\_klaas@wvpa.com](mailto:j_klaas@wvpa.com) email

Again, thank you for your time and consideration regarding our concerns.

Sincerely,



Jarod Klaas, P.E.  
Manager, Environmental Affairs  
Wabash Valley Power Association

CC: Hoosier Energy, Michalene Reilly, Darrell Bayless, Chris Norris  
Holland Energy, LLC, Barry Hatfield

Enclosure: Attachment 1

**EXHIBIT "A"**

Attachment 1  
Comments Regarding Holland Energy, LLC  
Title V Permit Issues March 20, 2009

1. Section 1.1, Source Identification: The source contact should be Mr. Jarod Klaas, 317-481-2838.
2. Section 1.2, Owner/Parent Company: The address for Holland Energy, LLC should be changed to 722 North High School Road, Indianapolis, Indiana 46214.
3. Section 1.3, Operator: The operator should be changed to ~~North American Energy Services~~ NAES Corporation (same address as listed in the permit) and the contact should be Mr. Barry Hatfield, 618-487-9140.
4. Section 3.1.3, Identification of Insignificant Activities and Section 4.0, Significant Emission Units at this Source: This section states that there are no insignificant activities pursuant to 35 IAC 201.210(a)(16); however, there is an emergency generator and a fire pump at the source that meet this definition. These units are now listed in Section 4.0 and it should be noted that the description of the emergency generator in Section 4.0 is incorrect. The diesel backup generator is a 750 horsepower unit (the permit has it listed as 235 hp). By definition, these units are insignificant activities and should therefore be included in Section 3.0, not 4.0. As described in a separate comment below, we believe that the fire pump is subject to the MACT standard, but pursuant to the Illinois regulations, this unit should still be considered insignificant.
5. Conditions 5.3.2, 7.1.3(b)(i), 7.2.3(b), 7.3.3(b) and 7.4.3(b): These conditions reference 35 IAC 212.123, Visible Emission Limitations. Condition 5.3.2 cites this regulation as being applicable source-wide. Therefore, it is redundant to repeat the rule requirements throughout Section 7 of the permit. We request that Conditions 7.1.3(b)(i), 7.2.3(b), 7.3.3(b) and 7.4.3(b) be removed from the permit.
6. Condition 5.10.2: Annual Emissions Report - This condition now requires the HAP emissions to be reported. Additionally, since IEPA is classifying the emergency generator and the fire pump as significant emission units, then the two should also be included on the report. Since the requirement is effective as of March 20, 2009 and HAPs or information pertaining to the generator and fire pump were not tracked during the 2008 calendar year, we do not believe that we would need to include them on the Annual Emissions Report; however, we would like additional guidance from IEPA on this matter.
7. Condition 7.1.3(i)(ii)(C): This condition erroneously references 35 IAC 217.708(g). The correct reference is 35 IAC 217.708(f).
8. Condition 7.1.3(k), Malfunction and Breakdown Provisions: We request that the text from the former permit Condition 7.1.3(h)(i) be reinstated for clarity. Specifically, we would like to reinstate the language clarifying that under a malfunction or breakdown scenario, the permittee shall begin shutdown of the CT/HRSG system within 90 minutes, unless the malfunction is expected to be repaired in 120 minutes or such shutdown could

threaten the stability of the regional electrical power system.

9. Condition 7.1.4(d) - This condition states that the turbines are not subject to 35 IAC 217.141 because they are not fuel combustion units; however, the citation is for Existing Emission Sources in Major Metropolitan Areas and the facility is not located in the Chicago or St. Louis metropolitan areas and therefore, would not be subject to this rule because of its location and request that this condition be removed.
10. Condition 7.1.6(c), Emission Limitations: This condition now includes an annual emission limit for the combustion turbines and the auxiliary boiler combined and states "the permit conservatively provides for overlapping operation of the auxiliary boiler for as many as 1,000 hours per year at full load while both of the CTs are operating." We do not understand why the IEPA is effectively limiting the auxiliary boiler to 1,000 hours per year and request that this statement be removed.
11. Condition 7.1.9(f), Recordkeeping Requirements: This condition requires recordkeeping of the ratio of water to fuel being fired in the affected turbine/HRSG system. This requirement would only apply to units that utilize a water injection system. Since the CT/HRSG systems are not equipped with water injection systems, this requirement does not apply and should be removed from the permit.
12. Section 7.2 Diesel Engines: This section assumes that both the backup generator and the fire pump are subject to the MACT standard found at 40 CFR 63, Subpart ZZZZ: NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE). Note that the two potentially subject units are a diesel mobile emergency generator with a rating of 750 hp and a stationary diesel fire pump with a rating of 235 hp.

Since the emergency generator is a mobile unit, it would not be subject to Subpart ZZZZ since this rule only applies to stationary sources. 40 CFR 63.6675 defines Stationary RICE as "any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition." 40 CFR 1068.30 defines a nonroad engine as "By itself or in or on a piece of equipment, it is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform."

With respect to the diesel fire pump, we believe that this unit is subject to the regulation, but given that it is less than 500 hp, we do not believe that there are any administrative or operating requirements.

13. Conditions 7.2.6 - 7.2.12: The diesel fire pump and emergency generator are, by definition, insignificant activities. We do not believe that all of the testing, monitoring, recordkeeping, reporting, and compliance procedure requirements are warranted. We requested that Conditions 7.2.6 and 7.2.12 be removed from the permit.

14. Condition 7.3.6(a)(iii). The requirements of 7.3.6(a) could not be found in the PSD Permit No. 99100022 and therefore, this paragraph should be removed.
15. Condition 7.4.3 b: This section proposes to impose a 30% opacity factor for the cooling tower. It specifically cites 35 IAC 212.123 for the authorization for this requirement. However, the opacity created by a wet cooling tower is primarily moisture in the form of water vapor (sometimes referred incorrectly to as "steam") and a small fraction of drift. Section 212.124 which is titled "Exceptions" has paragraph b that states:

*"Sections 212.122 and 212.123 of this Subpart shall not apply to emissions of water or water vapor from an emission unit."*

As such, the opacity limits proposed to be imposed citing 212.123 are clearly excluded from regulation by 212.124(b). We request that this condition be deleted.
16. Condition 7.4.c: To the extent that this paragraph relies on a visible plume of water vapor or water droplets emitted from the cooling tower, we believe that the requirement is invalid. It is, as clearly stated, only applicable to "particulate matter" not water vapor or droplets, as excluded above. We request that this condition be removed.
17. Condition 7.4.5 a: Please delete "*opacity observations*" from this paragraph. As noted above, opacity limits are not applicable to regulation by 212.122 and 212.123 if the opacity is caused by emissions of water or water vapor.
18. Condition 7.4.7 a. Testing Requirement: This section should be deleted in its entirety. The requirements refer to opacity reading ("Method 9") which we have shown not to be applicable to cooling towers. The one noted exception is Section 7.4.7 a. ii. which, for some reason, addresses "diesel engine (s)", not the cooling tower. As such, it too should be deleted.
19. Condition 7.4.12 a: We request that the references to Conditions 7.4.3 (b) and (c) be deleted as these conditions refer to opacity and not to particulate. Imposing opacity on wet plumes is clearly prohibited by Section 212.124, as noted above.
20. Condition 7.4.12 b: Should be deleted in its entirety. This condition imposes AP-42 emission factors on the facility for use to determine compliance with particulate emission limits from the cooling tower. We believe that this is incorrect for a number of reasons, including the following:
  - a) According to table 13.4-1 reproduced from AP-42 and inserted into the permit, the Emission Factor Rating for "Induced Draft" cooling tower "*Total Liquid Drift*" is a "D". According to AP-42 a rating of D "*=Tests are based on a generally unacceptable method, but the method may provide an order-of-magnitude value for the source.*" (AP- 42 Introduction, Page 9).
  - b) AP-42 continues to elaborate on a Emission Factor Rating of D: "*Below average. Factor is developed from A-, B- and/or C-rated test data from a small number of facilities, and there may be reason to suspect that these facilities do not represent a random sample of the industry. There also may be evidence of variability within the source population.*" (AP-42 Introduction, Page 10).
  - c) The above cited table, inserted in the Title V permit, shows a rather inaccurate Emission Factor Rating of an "E" for the PM-10 calculation. An E rating is described by EPA in AP-42 as "*Poor. Factor is developed from C-and D-rated data, and there may be reason to suspect that the facilities tested do not represent a random sample of the industry. There*

also may be evidence of variability within the source category population.” (AP-42 Introduction, page 10).

- d) The EPA further indicates: *“Emission factors in AP-42 are neither EPA-recommended emission limits (e.g., best available control technology or BACT, or lowest achievable emission rate or LAER) nor standards (e.g., National Emission Standards for Hazardous Air pollutants or NESHAP, or New Source Performance Standards or NSPS). Use of these factors as source-specific permit limits and/or as emission regulation compliance determinations is not recommended by EPA. Because emission factors essentially represent an average of a range of emission rates, approximately half of the subject sources will have emission rates greater than the emission factor and the other half will have emission rates less than the factor. As such, a permit limit using an AP-42 emission factor would result in half of the sources being in noncompliance.”* (Emphasis added.) (AP-42 Introduction, Page 2).
- e) Finally, it is worth noting that Table 13.4-1, footnote c acknowledges that the PM-10 factor *“...imply an effective TDS content of approximately 12,000 parts per million (ppm) in the circulating water.”* As the TDS rises in cooling water, the associated fine particulate would also rise, assuming all other things were constant. As this facility has a TDS limit of 3,000 ppm (see permit condition 7.4.5 b.), the 12,000 ppm value represents a 4 fold inappropriate stringency imposed by this method.
21. Condition 7.4.3(b) and (c): These conditions have been added to the renewal permit and reference 35 IAC 212.123, Visible Emission Limitations and 35 IAC 212.301, Fugitive Particulate Matter. Given the nature of cooling tower operations, there would not be any smoke or particulate matter resulting from the operation of this unit, and therefore, these conditions should be removed.
22. Condition 7.4.7(a)(i), (ii), and (vii): Section 7.4 pertains to operation of the cooling towers but there are several references to testing diesel engines and exhaust in the testing requirements found in Condition 7.4.7. These references should be modified to reference cooling towers instead of engines.
23. Condition 7.4.9. Based on the arguments stated above, we request that this section be deleted and replaced with the text from section 7.3.9 of the prior permit.
24. Condition 7.4.12 This condition establishes compliance procedures for demonstrating compliance with PM emission limitations. For the reasons discussed above, we request that this entire section be deleted.
25. Attachment 5 and 6 list Tenaska personnel and should be updated as follows:
- Attachment 5
- The designated representative should be changed from Greg Kunkle to Jarod Klaas, 722 North High School Road, Indianapolis, Indiana 46214
- Attachment 6
- Larry Carlson should be changed to Jarod Klaas, 722 North High School Rd, Indianapolis, Indiana 46214.

26. There are several rule citations that have been erroneously referenced throughout the permit and should be changed as follows:

- a) Section 7.1.3(b)(ii): "The emission of smoke or other particulate matter from the affected turbine/HRSG system shall not have an opacity greater than 20 percent, pursuant to 40 CFR ~~60.42a(b)~~ 60.42Da(b), except for one 6-minute period per hour of not more than 27 percent opacity, as further allowed by 40 CFR ~~60.42a(b)~~ 60.42Da(b)."
- b) Section 7.1.3(b)(iii): "When the duct burner in an affected CT/HRSG system is fired, the Permittee is hereby shielded from 35 IAC 212.122 and 35 IAC 212.123 [Condition 7.1.3(b)(i)(A) and Condition 5.3.2(b)] for the affected boilers as it must comply with 40 CFR ~~60.42a(b)~~-60.42Da(b) [Condition 7.1.3(b)(ii)]."
- c) Section 7.1.3(f)(i), Standard for Nitrogen Oxides: "Pursuant to 40 CFR ~~60.44(a)(d)(1)~~ 60.44Da(d)(1), no new source owner or operator...based on a 30-day rolling average, except as provided under 40 CFR ~~60.46a(k)(1)~~ 60.48Da(k)."
- d) Section 7.1.3(f)(ii), Standard for Sulfur Dioxide: "Pursuant to 40 CFR ~~60.43(a)(b)(2)~~ 60.43Da(b)(2), no owner or operator shall cause to be discharged..."
- e) Section 7.1.3(f)(iii), Standard for Particulate Matter: "Pursuant to 40 CFR ~~60.42(a)(1)~~ 60.42Da(a)(1), no owner or operator of an affected HRSG shall cause to be discharged..."
- f) Section 7.1.3(f)(iv), Standard for Opacity: "Pursuant to 40 CFR ~~60.42(b)~~ 60.42Da(b), no owner or operator..."
- g) Section 7.1.5(b): "The only fuels fired in the affected CT/HRSG systems shall be natural gas as defined in 40 CFR ~~60.41(e)~~ 60.41Da(c) [T1]."

27. Section 7.1.3(d)(i): The equation used to calculate the NO<sub>x</sub> emission allowance for fuel-bound nitrogen, calculated from the nitrogen content of the fuel, is incorrect for the percent by weight in the range of 0.1 to 0.25. This equation should be changed as follows to be consistent with 60.332(a)(4):

| Fuel-bound nitrogen<br>(percent by weight) | F<br>(NO <sub>x</sub> percent by volume) |
|--|--|
| N ≤ 0.015                                  | 0  |
| 0.015 < N ≤ 0.1                            | 0.04(N)                                  |
| 0.1 < N ≤ 0.25                             | 0.04 + 0.0067(N - 0.1)                   |
| N > 0.25                                   | 0.005                                    |

28. Section 7.1.7(b)(ii)(A): The equation used to calculate the NO<sub>x</sub> emission limitation is incorrect and should be changed as follows, pursuant to 40 CFR 60.335(b)(1):

$$\text{NO}_x = (\text{NO}_{x0})(P_r/P_0)^{0.5} e^{19(H_0 - 0.00633)(288^\circ\text{K}/T_a)^{1.53}}$$





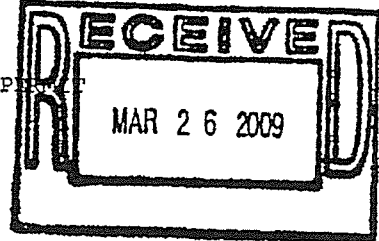
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

RENEWAL  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT



PERMITTEE:

Holland Energy, LLC  
Attn: Todd S. Jonas, Vice President  
1044 North 115th Street, Suite 400  
Omaha, Nebraska 68154

I.D. No.: 173807AAG  
Application No.: 03060072

Date Received: January 11, 2008  
Date Issued: March 20, 2009  
Expiration Date: March 20, 2014

Operation of: Holland Energy, Electric Generation  
Source Location: Rural Route #2, 270-A, Beecher City, Shelby County, 62414  
Responsible Official: Todd S. Jonas, Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE an electric power generation plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Ross Cooper at 217/782-2113.

*Edwin C. Bakowski, P.E.*  
MTR

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

ECB:RWC:psj

cc: Illinois EPA, FOS, Region 3  
CES  
Lotus Notes

Except as provided in Conditions 1.5 and 8.7 of this permit.