



Statement of Basis

Minor Air Quality Operating Permit Renewal

**Wessington Springs Diesel Generation Plant
Wessington Springs, South Dakota**

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1.0 Operational Description

1.1 Background

The City of Wessington Springs was issued minor air quality operating permit #28.0801-40 for a peaking and standby electrical generating station on February 14, 2006. The permit was renewed on January 20, 2011. In the renewal application, the City of Wessington Springs requested to change the name of the facility from HCPD Generation Addition to Wessington Springs Diesel Generation Plant. The permit expired on January 20, 2016. In accordance with Administrative Rules of South Dakota section 74:36:04:06, a timely and complete application to renew a minor permit is required 90 days before the permit expires. The City of Wessington Springs submitted an application to renew the minor air quality operating permit on October 16, 2015. Since the renewal application was received in a timely manner, the Wessington Springs Diesel Generation Plant may continue to operate under the existing permit until the department takes action on the renewal application.

The Wessington Springs Diesel Generation Plant consists of two diesel-fueled internal combustion engine/generator sets. Each engine/generator is equipped with a 3,500 gallon distillate oil storage tank integrated into the engine enclosure. The primary Standard Industrial Classification (SIC) code for the facility is 4911 (Electric Services). Table 1-1 lists the equipment and processes covered under the existing minor air quality operating permit #28.0801-40 issued January 20, 2011.

Table 1-1 – Permitted Equipment Description

Unit	Description	Maximum Operating Rate	Control Device
#1	Engine #1 – 2006 Detroit Diesel generator, model T1637M36, fueled with diesel fuel	2,000 kilowatts or 18.9 MMBtu/hr heat input	Not Applicable
#2	Engine #2 – 2006 Detroit Diesel generator, model T1637M36, fueled with diesel fuel	2,000 kilowatts or 18.9 MMBtu/hr heat input	Not Applicable

2.0 New Source Performance Standards

DENR reviewed the New Source Performance Standards (NSPS) in 40 CFR Part 60 and determined the following require further review to determine whether they are applicable to Wessington Springs Diesel Generation Plant.

2.1 Standards for Storage Tanks – Subparts K, Ka, and Kb

DENR determined that 40 CFR, Part 60, Subparts K, Ka, and Kb may be applicable. Subpart K is applicable to each storage vessel for petroleum liquids that has a storage capacity greater than 151,412 liters (40,000 gallons) which: (1) has a capacity greater than 151,416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons), and commences construction or

modification after March 8, 1974, and prior to May 19, 1978; or (2) has a capacity greater than 246,052 liters (65,000 gallons) and commences construction or modification after June 11, 1973, and prior to May 19, 1978.

Subpart Ka is applicable to each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction commenced after May 18, 1978, and prior to July 23, 1984.

Subpart Kb is applicable to each storage vessel with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

Each engine/generator is equipped with an integrated 3,500 gallon (13.2 cubic meter) distillate fuel storage tank. The storage tanks were constructed in 2006 and the storage capacity of each tank is below the minimum storage capacity for applicability to Subparts K, Ka, and Kb. Therefore, the storage tanks are not applicable to these standards.

2.2 Standards for Compression Ignition Internal Combustion Engines

The provisions of Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition internal combustion engines that meet one of the following:

1. Manufacturers of stationary compression ignition internal combustion engines with a displacement of less than 30 liters per cylinder where the model year is 2007 or later for engines that are not fire pump engines or model year 2008 or later for engines that are fire pump engines;
2. Owners or operators of stationary compression ignition internal combustion engines that commence construction after July 11, 2005 where the compression ignition internal combustion engine is manufactured after April 1, 2006 and is not a fire pump engine or manufactured as a certified national Fire Protection Association fire pump engine after July 1, 2006; or
3. Owners or operators of stationary compression ignition internal combustion engines that modified or reconstructed their stationary compression ignition engines after July 11, 2005.

For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Engines #1 and #2 were constructed after July 11, 2005. Therefore, Engines #1 and #2 are subject to this subpart. Engine #1 and #2 are nonemergency generators that commenced construction prior to 2007. The engines are not EPA certified and have a displacement of less than 10 liters per cylinder. The City of Wessington Springs installed an oxidation catalyst and continuous parameter monitoring system for each affected unit. Both diesel engines are equipped with a closed crankcase breather. Interpoll Laboratories, Inc. conducted performance tests on Units #1 and #2 on May 22, 2014. The stack tests indicated that Engines #1 and #2 were in compliance with the standard. The City of Wessington Springs has satisfied the initial notification and testing requirements. Therefore, these requirements will not be included in this permit.

2.3 Standards for Spark Ignition Internal Combustion Engines

Subpart JJJJ is applicable to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

1. On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 horsepower (except lean burn engines with a maximum engine power greater than or equal to 500 horsepower and less than 1,350 horsepower);
2. On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 horsepower and less than 1,350 horsepower;
3. On or after July 1, 2008, for engines with a maximum engine power less than 500 horsepower;
4. On or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 kilowatts (25 horsepower); or
5. Owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006.

Engines #1 and #2 are compression ignition stationary internal combustion engines. Therefore, the engines are not applicable to this subpart.

2.4 Other NSPS Standards

DENR reviewed the remaining New Source Performance Standards and determined there were no other applicable standards for this facility.

3.0 New Source Review

The Administrative Rules of South Dakota (ARSD) 74:36:10:01 state that New Source Review (NSR) regulations apply to areas of the state which are designated as nonattainment pursuant to the Clean Air Act for any pollutant regulated under the Clean Air Act. The Wessington Springs Diesel Generation Plant is located in Wessington Springs, South Dakota, which is in attainment or unclassifiable for all the pollutants regulated under the Clean Air Act. Therefore, the Wessington Springs Diesel Generation Plant is not subject to NSR review.

4.0 Prevention of Significant Deterioration

A prevention of significant deterioration (PSD) review applies to new major stationary sources and major modifications to existing major stationary sources in areas designated as attainment under Section 107 of the Clean Air Act for any regulated air pollutant. The following is a list of regulated air pollutants under the PSD program:

1. Total suspended particulate (PM);
2. Particulate with a diameter less than or equal to 10 microns (PM10);

3. Particulate with a diameter less than or equal to 2.5 microns (PM_{2.5});
4. Sulfur dioxide (SO₂);
5. Nitrogen oxides (NO_x);
6. Carbon monoxide (CO);
7. Ozone – measured as volatile organic compounds (VOCs);
8. Lead;
9. Fluorides;
10. Sulfuric acid mist;
11. Hydrogen sulfide;
12. Reduced sulfur compounds;
13. Total reduced sulfur; and
14. Greenhouse gases (carbon dioxide, methane, nitrous oxide, etc.).

If the source is considered one of the 28 named PSD source categories listed in Section 169 of the federal Clean Air Act, the major source threshold is 100 tons per year of any regulated pollutant, except for greenhouse gases. The major source threshold for all other sources is 250 tons per year of any regulated pollutant, except for greenhouse gases.

On June 23, 2014, the Supreme Court of the United States issued a ruling that the EPA could not require facilities to obtain a Prevention of Significant Deterioration program permit based solely on greenhouse gas emissions. The Supreme Court ruling states that in order for a Prevention of Significant Deterioration program evaluation for greenhouse gas to occur, a facility must trigger one of the major source thresholds for another regulated pollutant before greenhouse gas emissions can be considered under the Prevention of Significant Deterioration permitting program. This ruling applies to both new Prevention of Significant Deterioration program sources as well as major source modifications.

4.1 Potential Emissions

The department uses stack test results to determine air emissions whenever stack test data is available from the source or a similar source. When stack test results are not available, the department relies on manufacturing data, material balance, EPA's Compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1), information submitted in the application, or other methods to determine potential air emissions. Potential emissions for each applicable pollutant are calculated by assuming the unit operates every day of the year at the maximum design capacity (8,760 hours per year).

The following air quality review is based on the heat input of each diesel engine. The maximum capacity of 2,936 horsepower is the power output and not heat input. Therefore, the heat input capacity must be calculated from the fuel consumption and the average Btu content of the distillate oil. The application states that maximum amount of distillate oil each diesel engine can consume is 135 gallons per hour. The heating value of distillate oil ranges from 130,000 to 140,000 Btus per gallon. The heat input capacity for each diesel engine will be based on the highest heating value and is calculated using Equation 4.1

Equation 4.1 – Converting from heat output to heat input

$$\text{HeatInput} = \frac{135 \text{ gallons}}{\text{hour}} \times \frac{140,000 \text{ Btus}}{\text{gallon}} \times \frac{\text{MMBtus}}{10^6 \text{ Btus}} = 18.9 \text{ MMBtus/hour}$$

The maximum capacity of each diesel engine is 2,936 horsepower. Generators with a maximum operating rate greater than 600 horsepower are considered large stationary generators. The sulfur dioxide emission factor for large diesel generators is derived from the compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1), Table 3.4-1, October, 1996.

The diesel generators are subject to the distillate oil sulfur content limit of 15 parts per million for nonroad diesel in 40 CFR § 80.510(b). Therefore, the sulfur dioxide emission rate is based on a sulfur content of 0.0015 weight percent.

$$\begin{aligned} \text{SO}_2 &= 1.01 \times \text{S pounds per MMBtu;} \\ &\text{where S} = \text{weight percent sulfur in distillate oil} \\ &= 1.01 \times 0.0015 \text{ pounds per MMBtu} \\ &= 0.0015 \text{ pounds per MMBtu} \end{aligned}$$

The potential SO₂ emissions are calculated using Equation 4.2 and the heat input capacity from Equation 4.1.

Equation 4.2 – Potential SO₂ Emissions

$$\text{Potential} \left(\frac{\text{tons}}{\text{year}} \right) = \frac{\text{Emission Factor} \left(\frac{\text{pounds}}{\text{MMBtu}} \right) \times \text{Input Capacity} \left(\frac{\text{MMBtus}}{\text{hour}} \right) \times 8,760 \left(\frac{\text{hours}}{\text{year}} \right)}{2,000 \left(\frac{\text{pounds}}{\text{ton}} \right)}$$

The manufacturer guaranteed emission rates for particulate matter, nitrogen oxides, carbon monoxide, and hydrocarbon for the diesel engines are given in Table 4-1.

Table 4-1 –Manufacturer Guaranteed Emission Rates (g/hp-hr)

	PM	NO _x	CO	HC
Diesel engine	0.120	5.690	0.650	0.450

The potential particulate matter, nitrogen oxide, carbon monoxide, and volatile organic compound emissions from the diesel engines are calculated using Equation 4.3, the rated horsepower of the engines (2,936 horsepower), and the appropriate manufacturer guaranteed emission rate from Table 4-1.

Equation 4.3 – Potential Emission Calculations

$$\text{Potential} \left(\frac{\text{tons}}{\text{year}} \right) = \frac{\text{Emission Factor} \left(\frac{\text{grams}}{\text{hp-hr}} \right) \times 2,936 \text{ hp} \times 8,760 \left(\frac{\text{hours}}{\text{year}} \right)}{2,000 \left(\frac{\text{pounds}}{\text{ton}} \right) \times 453.59 \left(\frac{\text{grams}}{\text{pound}} \right)}$$

The potential emissions from the diesel generators are summarized in Table 4-2.

Table 4-2 – Potential Emissions Summary (tons/year)

Unit	PM/10₁₀/PM_{2.5}	SO₂	NO_x	CO	VOC
#1	3.4	0.12	161.3	18.4	12.8
#2	3.4	0.12	161.3	18.4	12.8
Total	6.8	0.2	323	37	26

4.2 PSD Summary

The Wessington Springs Diesel Generation Plant is not considered one of the 28 named PSD source categories; therefore, the threshold for criteria pollutants is 250 tons per year. The potential nitrogen oxide emissions from the diesel generators are greater than 250 tons per year. However, the Wessington Springs Diesel Generation Plant requested federally enforceable limits in the permit to keep the facility out of the Title V air quality operating permit program. Operational limits will be placed in the permit to ensure that the nitrogen oxide emissions do not exceed 50 tons per year. Therefore, the Wessington Springs Diesel Generation Plant is classified as a minor source under the PSD program and is not subject to PSD requirements. Based on the Supreme Court’s decision and because the Wessington Springs Diesel Generation Plant is not applicable to the PSD program, a review of greenhouse gas emissions is not warranted or required.

4.3 Federally Enforceable Permit Restrictions

Based on the potential emission calculations, the Wessington Springs Diesel Generation Plant is considered a major source and meets the requirements for a Title V air quality operating permit. A major source is defined in ARSD 74:36:01:08 as any source with the potential to emit 100 tons per year of a criteria pollutant (particulate, sulfur dioxide, nitrogen oxides, volatile organic compounds, and/or carbon monoxide). The Wessington Springs Diesel Generation Plant’s potential nitrogen oxide emissions are greater than 100 tons per year.

The Wessington Springs Diesel Generation Plant requested that federally enforceable limits be placed in the permit to restrict the actual emissions below the major source threshold for the Title V air quality permit program. Operational restrictions will be placed in the permit to limit the amount of distillate oil consumed in the diesel engines. Therefore, the Wessington Springs Diesel Generation Plant is considered a minor source.

The diesel engines are fueled with distillate oil. The Wessington Springs Diesel Generation Plant has accepted an operation limit to restrict the number of hours the diesel generators can operated per 12-month rolling period. The limit will be established at 50 percent of the major source threshold for a Title V air quality operating permit. This limit will allow the facility to forgo a short-term NO_x emission limit and stack testing for NO_x. The operation restriction will ensure that the Wessington Springs Diesel Generation Plant does not exceed the major source thresholds under the Title V air quality permit program.

Based on a fuel usage of 135 gallons of distillate oil per hour for each diesel engine, the Wessington Springs Diesel Generation Plant’s potential nitrogen oxide emissions are 323 tons per year. The potential fuel usage for the diesel engines is calculated using Equation 4.4.

Equation 4.4 – Diesel Generator Potential Fuel Usage

$$\text{Fuel Usage} \left(\frac{\text{gal}}{\text{year}} \right) = 135 \left(\frac{\text{gal}}{\text{hr-engine}} \right) \times 8,760 \left(\frac{\text{hours}}{\text{year}} \right) \times 2 \text{ engines} = 2,365,200 \text{ gallons/yr}$$

The potential distillate oil fuel usage for both diesel engines is 2,365,200 gallons per year. The potential nitrogen oxide emissions assuming each generator operates 8,760 hours per year is 323 tons per year. The amount of fuel used is directly proportional to the emissions; therefore, Equation 4.5 may be used to calculate a limit on the number of hours per 12-month rolling period the generators can operate before the nitrogen oxide emission limit of 50 tons per year is exceeded.

Equation 4.5 – Hourly Emission Limit

$$\text{Hourly Limit} \left(\frac{\text{hours}}{\text{year}} \right) = \frac{2,365,200 \left(\frac{\text{gallons}}{\text{yr}} \right) \times 50 \left(\frac{\text{tons NOx}}{\text{year}} \right)}{135 \left(\frac{\text{gallons}}{\text{hr}} \right) \times 323 \left(\frac{\text{tons NOx}}{\text{year}} \right)} = 2,712 \text{ hours/year}$$

The permit will include conditions that will allow the Wessington Springs Diesel Generation Plant to operate the diesel engines for a maximum of 2,712 hours per 12-month rolling period.

5.0 National Emission Standards for Hazardous Air Pollutants

DENR reviewed the national emission standards for hazardous air pollutants under 40 CFR Part 61 and determined there are no applicable requirements associated with the Wessington Springs Diesel Generation Plant’s operations.

6.0 Maximum Achievable Control Technology Standards

The federal Maximum Achievable Control Technology Standards are applicable to both major and area sources of hazardous air pollutants. A major source of hazardous air pollutants is defined as having the potential to emit 10 tons or more per year of a single hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An area source is a source that is not a major source of hazardous air pollutants.

DENR uses stack test results to determine air emissions whenever stack test data is available from the source or a similar source. When stack test results are not available, DENR relies on manufacturing data, material balance, EPA’s Compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1) document, information submitted in the permit application, or other methods to determine potential air emissions.

6.1 Potential HAP Emissions

The hazardous emission factor for diesel generators greater than 600 horsepower was derived from AP-42, Tables 3.4-3 and 3.4-4, October 1996. The hazardous air pollutant emission factors for large diesel generators are listed in Table 6-1. The total HAP emission factor is 0.00157 pounds per million Btus.

Table 6-1 – Hazardous Air Pollutant Emission Factors (Large Diesel Generator)

Compound	Emission Factor
Benzene	7.76 E-04 pounds/MMBtu
Toluene	2.81 E-04 pounds/MMBtu
Xylene	1.93 E-04 pounds/MMBtu
Formaldehyde	7.89 E-05 pounds/MMBtu
Acetaldehyde	2.52 E-05 pounds/MMBtu
Acrolein	7.88 E-06 pounds/MMBtu
PAH	2.12 E-04 pounds/MMBtu
Total Hazardous Air Pollutants	1.57 E-03 pounds/MMBtu

The potential hazardous air pollutant emissions from the diesel engines were calculated using Equation 6.1.

Equation 6.1 – Potential Hazardous Air Pollutant Emissions

$$\text{HAPs} = \frac{0.00157 \text{ pounds}}{\text{MMBtu}} \times \frac{18.9 \text{ MMBtu}}{\text{hour}} \times \frac{8,760 \text{ hours}}{\text{year}} \times \frac{\text{ton}}{2,000 \text{ pounds}} = 0.13 \text{ tons/yr}$$

The potential HAP emissions from the diesel engines are given in Table 6-2.

Table 6-2 – Potential HAP Emissions (tons/year)

Unit	HAPs
#1	0.13
#2	0.13
Total	0.3

As shown in Table 6-2, the potential hazardous air pollutant emissions are less than 10 tons of a single hazardous air pollutant and less than 25 tons of any combination of hazardous air pollutants. Therefore, the Wessington Springs Diesel Generation Plant is considered an area source for hazardous air pollutants.

DENR reviewed the maximum achievable control technology (MACT) standards under 40 CFR Part 63 and determined the following may be applicable.

6.2 Standards for Reciprocating Internal Combustion Engines

Subpart ZZZZ is applicable to owners or operators of stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. Stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile.

An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. As defined in § 63.6590 (a)(1)(iii) a stationary RICE is existing if construction or reconstruction of the stationary RICE commenced before June 12, 2006. Stationary RICE located at an area source is new if construction commenced on or after June 12, 2006. Engines #1 and #2 commenced construction after June 12, 2006, and are considered new stationary RICE.

In accordance with 40 CFR §63.6590(c)(1), a new or reconstructed stationary reciprocating internal combustion engine located at an area source of hazardous air pollutants must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines. No further requirements apply for such engines under this part.

Although Engines #1 and #2 are applicable to this subpart, they are not subject to any requirements under the subpart. Engines #1 and #2 will be requirement to meet the requirements of this subpart by meeting the requirements in 40 CFR Part 60, subpart IIII.

6.3 Other MACT Standards

DENR reviewed the remaining maximum achievable control technology standards and determined there were no other applicable standards for this facility.

7.0 State Requirements

The Wessington Springs Diesel Generation Plant's potential nitrogen oxide emissions are greater than the major source threshold of 100 tons per year. However, the City of Wessington Springs requested federally enforceable operating limits in the permit to keep the Wessington Springs Diesel Generation Plant out of the Title V air quality operating permit program.

The diesel engines are subject to particulate, sulfur dioxide, and nitrogen oxide emission limits. Compliance with the sulfur dioxide emission limits will be based on the sulfur content of the distillate oil. The Wessington Springs Diesel Generation Plant will be required to obtain a fuel supplier's certificate for each load of distillate oil received by the facility and to record the amount of distillate oil consumed in Engines #1 and #2 each calendar year. If a fuel supplier's certificate is not obtained, the facility will be required to test the sulfur content of the distillate oil in the storage tank after each shipment has been unloaded. Compliance with the nitrogen oxide limits for the diesel engines will be based on limiting the number of hours the diesel engines are allowed to operate in a 12-month rolling period.

7.1 State Emission Limits

South Dakota has air emission limits for particulate, sulfur dioxide, and opacity. The emission limit for particulate is based on total suspended particulate.

Visible Emission Limit

In accordance with 74:36:12:01, the owner or operator may not discharge into the ambient air from a single unit of emissions an air pollutant of a density equal to or greater than that designated as 20 percent opacity. Each permitted unit is required to meet the 20 percent opacity limit (six-minute average) measured by EPA Method 9.

Particulate Matter and Sulfur Dioxide Emission Limits

The state emission limit for particulate matter for a fuel burning unit with heat input value greater than or equal to 10 million Btus per hour is given in ARSD 74:36:06:02(1)(b). The state's sulfur dioxide limit for fuel burning units is given in ARSD 74:36:02(2).

In accordance with ARSD 74:36:06:01, the particulate matter limits in ARSD 74:36:06:02(1)(b) and the sulfur dioxide emission limits in ARSD 74:36:06:02(2) are applicable except as otherwise specified in ARSD 74:36:07, which incorporates the requirements in 40 CFR Part 60. Units #1 and #2 are applicable to particulate matter and sulfur dioxide emission limits in 40 CFR Part 60, Subpart IIII. Therefore, the state's particulate matter and sulfur dioxide emission limits are not applicable.

7.2 Acid Rain Program

The Wessington Springs Diesel Generation Plant is exempt from the Acid Rain Program under 40 CFR 72.7 for new units. A new unit is exempt from the Acid Rain Program if it meets the following requirements:

1. The unit serves during the entire year (except for any period before the unit commenced commercial operation) one or more generators with total nameplate capacity of 25 MWe or less;
2. The unit burns fuel that does not include any coal or coal-derived fuel (except coal-derived gaseous fuel with a total sulfur content no greater than natural gas); and
3. The unit burns gaseous fuel with an annual average sulfur content of 0.05 percent or less by weight and nongaseous fuel with an annual average sulfur content of 0.05 percent or less by weight.

The Wessington Springs Diesel Generation Plant meets the requirements for the exemption under the Acid Rain Program. The Wessington Springs Diesel Generation Plant will be required to maintain records to demonstrate that these requirements are met. The maximum capacity of each diesel engine will be limited to 2,000 kilowatts (2 MWe), each diesel engine will be limited to burning only distillate oil, and the facility must maintain records of the sulfur content of the distillate oil. The records must be kept at the source for a period of five years.

7.3 Summary of Applicable Requirements

The Wessington Springs Diesel Generation Plant will be required to operate within the requirements stipulated in the following regulations under the minor air quality permit program:

1. ARSD 74:36:06 – Operating Permits for Minor Sources;
2. ARSD 74:36:06 – Regulated Air Pollutant Emissions;
3. ARSD 74:36:07 – New Source Performance Standards;
4. ARSD 74:36:11 - Performance Testing; and
5. ARSD 74:36:12 - Control of Visible Emissions.

8.0 Recommendation

Based on the information submitted in the air quality permit renewal application, the department recommends conditional approval of a minor air quality operating permit for the Wessington Springs Diesel Generation Plant in Wessington Springs, South Dakota. Question regarding this permit review should be directed to Marlys Heidt, Engineer III.