
DWEE ID: 70919
Program ID: AIR 025-00054

Permit Issued To: Omaha Public Power District
Name of Source in Application: OPPD - Cass County Station

Mailing Address: Sustainability and Environmental Affairs,
1919 Aksarben Drive, Omaha, Nebraska 68106
Source Location: 3520 Mill Road, Plattsmouth, Cass County, Nebraska

DESCRIPTION OF THE SOURCE OR ACTIVITY:

The Omaha Public Power District (OPPD) operates natural gas combustion turbine units for electrical generation at the Cass County Station located at 3520 Mill Road, Plattsmouth, Nebraska. As a by-product of the combustion of natural gas, sulfur dioxide (SO₂) and nitrogen oxides (NO_x) are emitted. Being a known precursor of acid rain, Title IV of the 1990 Clean Air Act established control requirements for sulfur dioxide emissions. Both combustion turbines at the Cass County Station, emission units CT-1 and CT-2, meet the applicability criteria of the Acid Rain Program.

This Acid Rain permit renewal, 24AR-044, is based on an Acid Rain permit application received December 4, 2024. The application states standard requirements that apply to combustion turbines emission units CT-1 and CT-2, and specifies a compliance plan for sulfur dioxide (SO₂) emissions. The compliance option chosen by OPPD is to hold allowances equal to or greater than the total amount of SO₂ emitted in tons. An allowance in the Acid Rain Program is equal to one ton of SO₂ emitted.

The U.S. Environmental Protection Agency (USEPA) did not allocate any allowances to the Cass County Station (§73.10, Table 2). However, OPPD is required by the Acid Rain Program to 1) hold allowances, as of the allowance transfer deadline (as defined in §72.2), in the source's compliance account, recorded under §73.34(c), and not less than the total annual emissions of sulfur dioxide for the previous calendar year; and 2) comply with the applicable acid rain emissions limitations for sulfur dioxide. Allowances in the Acid Rain Program can be bought, sold or traded in accordance with the SO₂ allowance system found in 40 CFR Part 73.

TYPE AND QUANTITY OF AIR CONTAMINANT EMISSIONS ANTICIPATED:

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by USEPA. This does not necessitate a revision to the unit SO₂ allowance allocations identified in this permit.

STATUTORY OR REGULATORY PROVISIONS ON WHICH PERMIT REQUIREMENTS ARE BASED:

The Acid Rain Regulations found in 40 CFR Parts 72 through 78 apply to the OPPD - Cass County Station.

The OPPD - Cass County Station is subject to Title 129 - Nebraska Air Quality Regulations (NAQR) as amended September 28, 2022, in particular the following Chapters.

- Chapter 1 - Definitions
- Chapter 5 - Acid Rain
- Chapter 10 - Permits-Public Participation

Compliance with this permit shall not be a defense to any enforcement action for violation of an ambient air quality standard.