

FACT SHEET FOR: CP25-036R**DATE: DRAFT****NDWEE ID:** 116017**Name of Source:** OPPD – Turtle Creek Station**Source Classification:** Major New Source Review (NSR) source at time of issuance
Area Source of Hazardous Air Pollutants (HAPs)

Regulatory changes may supersede information in this document. If the source should add or change equipment or change processes such that a NESHAP or NSPS subpart becomes an applicable requirement, it is the source's obligation to comply with that subpart and applicable requirements whether or not they are identified in the associated permitting action or Title 129. Also note that the NESHAP and NSPS subparts are subject to change. Detailed information related to NESHAP and NSPS subparts can be found on the NDWEE Air Toxics Notebook and NDWEE NSPS Notebook located on the NDWEE website (<http://dwee.nebraska.gov/>). The NDWEE website can also be used to find other permit related and facility specific information that is not identified in this fact sheet.

DESCRIPTION OF THE SOURCE OR ACTIVITY:

Omaha Public Power District (OPPD) Turtle Creek Station (OPPD Turtle Creek) is an electric generation peaking facility. The facility's purpose is to assist the Omaha metropolitan area during events of emergency and/or increased demand. The facility's operations include three 225-megawatt (MW) dual fuel simple-cycle combustion turbines, a 1,371-kilowatt (kW) diesel-fired emergency generator, a 1,250-kW diesel-fired emergency generator, a 250 horsepower (hp) diesel-fired fire pump, and three 5.3 million British thermal units per hour (MMBtu/hr) natural gas dewpoint heaters.

PERMIT HISTORY:

Date Issued	Number	Status
12/06/2022	CP21-035	Not active, superseded by CP25-036
06/21/2025	CP24-048	Not active, superseded by CP25-036
04/09/2026	CP25-036	Active; Condition III.(D)(4) superseded by CP25-036R
tbd	CP25-036R	Active

PERMIT ACTION:

On April 9, 2026, the NDWEE issued permit CP25-036 to OPPD Turtle Creek for revisions to annual operating limitations on the three combustion turbines (CT-1, CT-2, and CT-3), as-built changes to the fire pump (EU-FP) from 315 hp to 250 hp, and removal of the natural gas-fired building heaters that were not constructed.

Storage vessel (DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW) limitations and operating conditions were incorporated in the permit as a result of the project as well. The issued permit included references to 40 CFR 60.110(c) (i.e.: NSPS Kc).

On July 28, 2026, NDWEE received correspondence from OPPD Turtle Creek requesting NDWEE to reopen certain parts of CP25-036 for cause; after review, NDWEE concurred that CP25-036 must be reopened for cause. Based on updated information received from OPPD, the NSPS subpart was not applied correctly.

As such, this permitting action reopens Condition III.(D)(4) to address NSPS applicability.

TYPE AND QUANTITY OF AIR CONTAMINANT EMISSIONS ANTICIPATED:

The emissions for this project, including fugitive emissions, are shown in the potential-to-emit (PTE) table below:

Regulated Pollutant	Pre-Project PTE^[1] (tpy)	Post-Project PTE (tpy)	Project PTE (tpy)
Particulate Matter (PM)	71.87	71.87	0
PM smaller than or equal to 10 microns (PM ₁₀)	117.96	117.96	0

Regulated Pollutant	Pre-Project PTE ^[1] (tpy)	Post-Project PTE (tpy)	Project PTE (tpy)
PM smaller than or equal to 2.5 microns (PM _{2.5})	117.54	117.54	0
Sulfur Dioxide (SO ₂)	11.02	11.02	0
Oxides of Nitrogen (NO _x)	537.77	537.77	0
Carbon Monoxide (CO)	1,049.33	1,049.33	0
Volatile Organic Compounds (VOC)	75.94	75.94	0
Greenhouse Gases (GHGs)	1,936,972	1,936,972	0
Carbon Dioxide Equivalents (CO ₂ e)	1,940,853	1,940,853	0
Hazardous Air Pollutants (HAPs)			
Highest Individual HAP: Formaldehyde	3.31	3.31	0
Total HAPs	11.69	11.69	0

SUPPLEMENTAL INFORMATION:

Title 129, Chapter 2 – Ambient Air Quality Standards (AAQS)

An air dispersion modeling analysis was not required for this permitting action as there are no changes in emissions as part of this permitting action. Details of previous modeling analyses can be found in fact sheet discussions associated with previously issued construction permits.

Title 129, Chapter 4 - Prevention of Significant Deterioration (PSD)

OPPD Turtle Creek is not one of the twenty-eight listed source categories identified in 40 CFR §52.21(b)(1)(iii) and incorporated by reference in Title 129, Chapter 2, Section 001. Since OPPD Turtle Creek is not a listed source, OPPD Turtle Creek is subject to the 250 tons per year emissions thresholds for determining major source status and fugitive emissions do not need to be included in this determination.

As permitted, OPPD Turtle Creek is classified as a major stationary source under the NSR program because the potential emissions of NSR regulated pollutants, such as NO_x and CO are above the NSR major source threshold of 250 tons per year per pollutant. Since OPPD Turtle Creek is a major stationary source with respect to the NSR program, OPPD must evaluate modifications in accordance with NSR major source modification thresholds.

According to 40 CFR §52.21(a)(2)(iv)(a), a modification is major in nature if it causes two types of emissions increases: (1) a significant emissions increase (as defined in 40 CFR §52.21(b)(4)) **and** (2) a significant net emissions increase (as defined in 40 CFR §52.21(b)(3) and (23)). If the modification is classified as being major in nature, the project needs to be evaluated as such, including but not limited to pre-application monitoring, a best available control technology (BACT) analysis, ambient air dispersion modeling, and an additional impacts analysis.

There are no emission changes associated with this project (thus no significant emission increases nor significant net emission increases) because the proposed limitations are not being changed, there are no other changes in the process, etc. As such, this modification is not major in nature.

Additionally, the previous BACT limitations prescribed for DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW did not change as a result of the issuance for this permitting action.

Title 129, Chapter 9 – Permit Revisions

On July 29, 2026, the NDWEE notified OPPD Turtle Creek that CP25-036 will be reopened for cause in accordance with Title 129, Chapter 9, Section 006. This reopen for cause is being issued with the purpose of correcting one NSPS citation regarding storage vessels on site (DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW).

Title 129, Chapter 12 – New Source Performance Standards (NSPS)

Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023:

This subpart, adopted by reference in Title 129, Chapter 12, Section 001.20, applies to owners or operators of Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023. The storage vessels (DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW) meet the applicability criteria prescribed in the regulation and as such as subject to the rule.

It is NDWEE’s understanding that start of construction notice was submitted on December 16, 2022 under which included the storage vessels (DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW). Tank foundation construction began in September 2022 with foundations backfill completed in December 2022. Fuel oil tank erection began in January 2023 and was concluded in July 2023. Following tank erection, fuel oil tank coating and insulating continued until the beginning of October 2023. The fuel oil storage tanks began operation under on June 17, 2025.

Because construction of the storage vessels commenced after July 23 1984 and before October 4, 2023 the units are subject to the above referenced regulation.

Additionally, OPPD Turtle Creek is subject to multiple NSPS subparts that are not affected by this project. Please refer to previously issued fact sheets regarding NSPS.

REVISED SPECIFIC PERMIT CONDITIONS:

Below is a mark-up that identifies all of the revisions to the original conditions. Additions are **bolded and underlined**, deletions are in ~~strike through~~, and NDWEE comments are in *italics*.

Condition III.(D)(4) of permit CP25-036R now reads:

- (D) Specific Conditions for Tanks
- (4) Applicable NSPS, NESHAP, and MACT Standards:

The following standards are applicable to DFT-1 NW, DFT-2 NE, DFT-3 SE, and DFT-4 SW:

<u>Applicable Standard</u>	Title	<u>Rule Citation</u>
<u>NSPS Subpart A</u>	General Provisions	<u>Chapter 12, Sec. 001.01</u> <u>40 CFR 60.1</u>
<u>NSPS Subpart</u> <u>Keb</u>	Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After <u>July 23, 1984, and On or Before</u> October 4, 2023	<u>Chapter 12, Sec. 001.20</u> <u>40 CFR 60.110eb</u>