



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Air Enforcement: Tennessee Air Pollution Control Board Proposed Order/Civil Penalty Addressing Kyles Ford Electric Cooperative Backup Generating Facility

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The Tennessee Air Pollution Control Board issued on October 21st a Proposed Technical Secretary's Order and Assessment of Civil Penalty ("Order") to Powell Valley Electric Cooperative ("PVEC") addressing alleged violations of an Air Permit. See Case No. APC25-0154.

The Order provides that PVEC operates pursuant to a Major Source Operating Permit (i.e., Clean Air Act Title V Permit) for eleven 2,628 Horsepower Diesel-Fired Generator Engines in Kyles Ford Tennessee.

The Engines are stated to provide back-up utility power to the Tennessee Valley Authority during periods of high demand.

Tennessee Division of Air Pollution Control ("Division") personnel conducted a compliance inspection at the facility on February 28th. A follow-up visit to review compliance records was stated to have been undertaken.

Division personnel are stated to have determined that the pressure drop across the catalyst for six of the 11 generators deviated by more than two inches of water from the value established during the most recent performance test. The alleged deviations are stated to be violations of E4-11 of the Permit and identified in the Order.

The Order also provides that Generator #9 could not be evaluated for compliance with the pressure drop limit because the provided data included negative numbers. The Division therefore is stated to consider the pressure drop monitoring system for this unit to be down between January 22 and February 21st.

The records provided by PVEC are stated to have not provided the "Pressure Drop Difference from Established Limit" and "Temperature Reading 4-Hour Rolling Average" as required by condition E4-21 of Permit.

The Order assesses a \$10,500.00 civil penalty. However, \$3,000.00 of the civil penalty can be waived if the facility complies with certain requirements in the Order.

The Order provides certain appeal rights.

A copy of the Order can be downloaded [here](#).

