Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Entergy New Orleans, Inc.**	**AI #:**	**32494**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Michoud Electric Generating Plant**	**Remarks Submitted by:**	**Christee Herbert**		
Permit Writer:	**Sam Phillips**	**Permit Writer Email address:**	**Sanford.phillips@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis III. Proposed Project/ Permit Information	Issue: The Permitted Air Emissions (in TPY) After rates need to be revised to the following: SO2: 39,617.86 NOx: 11,662.70 CO: 2,366.94 VOC: 196.88	Change made based on additional information received 8/22/2008.
Statement of Basis III. Proposed Project/ Permit Information	Issue: The Permitted Air Emissions (in TPY) Change rates need to be revised to the following: SO2: - 5,638.14 NOx: + 1,576.6 CO: - 314.31 VOC: 24.7	Change made based on additional information received 8/22/2008.

Cover Page	Issue: Permit Expiration date needs to be revised to 2013. Reason: The current Title V Permit expires on October 12, 2009. A timely renewal can be submitted up to 18 months before expiration. At this point in the permitting process given the application additional information submittals, this draft is within the 18 month timeframe.	Change made based on additional information received 8/22/2008.
Air Permit Briefing Sheet, page 2	Issue: The Permitted Air Emissions (in TPY) After rates need to be revised to the following: SO2: 39,617.86 NOx: 11,662.70 CO: 2,366.94 VOC: 196.88	Change made based on additional information received 8/22/2008.
Air Permit Briefing Sheet, page 2	Issue: The Permitted Air Emissions (in TPY) Change rates need to be revised to the following: SO2: - 5,638.14 NOx: + 1,576.6 CO: - 314.31 VOC: 24.7	Change made based on additional information received 8/22/2008.
Air Permit Briefing Sheet, page 2	Issue: The Permitted Air Emissions (in TPY) After AND Change rates need to be revised to the following: 1,1,1-Trichlorethane: 0.06 Antimony (and compounds): 1.33 Arsenic (and compounds): 0.34 Benzene: 0.07 Beryllium: 0.01 Cadmium (and compounds): 0.10 Cobalt compounds: 1.51 Ethyl benzene: 0.02 Lead compounds: 0.38 Mercury (and compounds): 0.03	Change made based on additional information received 8/22/2008.
	Naphthalene: 0.28	
	Nickel (and compounds): 21.32 Phosphorus: 2.39 Polycyclic Organic Matter (POM): 0.33 Selenium (and compounds):0.11 Toluene: 1.56 Xylene (mixed isomers): 0.03 Zinc (and compounds): 7.35 n-Hexane: 50.72	

	Total: 98.46	
Specific Requirements, page 2 of 11. Requirement #18 SCN0001, C1A and C1B	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance testing.	Change made.
Specific Requirements, page 3 of 11. Requirement #24 and #25 SCN0002, C1A and C1B	Issue: Delete specific requirements 24 and 25. Please replace these requirements with the following 2 requirements. 1) Determine sulfur dioxide concentration in stack gases using the methods in LAC 33:III.1503.D.Table 4. Use these methods for initial compliance determinations and for additional compliance determinations for those facilities not subject to continuous emission monitoring. Compliance with 40 CFR 75.11(d)(2) shall be determined as compliance with this specific condition. [LAC 33:III.1503.D.1] 2) Permittee shall demonstrate compliance by monitoring input sulfur and calculating sulfur dioxide emissions. [LAC 33:III.1511.C]. Reason: The unit has SO_2 fuel flow monitoring and Fuel analyses that can prove compliance with Chapter 15 standards per 1503.D.3. Entergy's Sterlington Plant (AI 19483) has the above 2 requirements instead of the Michoud #24 and #25 requirements.	Change made.
Specific Requirements, page 3 of 11. Requirement #29 SCN0002, C1A and C1B	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance testing.	Change made.
Specific Requirements, page 4 of 11. Requirement #32 SCN0003, C2A and C2B	Issue: complies by using sweet natural gas is missing form specific requirement #32 Please add "Complies by using sweet natural gas as fuel," to this requirement. This is consistent with Specific requirement #16.	Change made.
Specific Requirements, page 4 of 11. Requirement #33 SCN0003, C2A and C2B	Issue: complies by using sweet natural gas is missing form specific requirement #33 Please add "Complies by using sweet natural gas as fuel," to this requirement. This is consistent with Specific requirement #17.	Change made.
Specific Requirements, page 4 of 11. Requirement #34	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance	Change made.

SCN0003, C2A and C2B	testing.	
Specific Requirements, page 4 of 11. Requirement #37 SCN0004, C3	Issue: complies by using sweet natural gas is missing form specific requirement #37 Please add "Complies by using sweet natural gas as fuel," to this requirement. This is consistent with Specific requirement #16.	Change made.
Specific Requirements, page 4 of 11. Requirement #38 SCN0004, C3	Issue: complies by using sweet natural gas is missing form specific requirement #38 Please add "Complies by using sweet natural gas as fuel," to this requirement. This is consistent with Specific requirement #17.	Change made.
Specific Requirements, page 5 of 11. Requirement #39 SCN0004, C3	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance testing.	Change made.
Specific Requirements, page 5 of 11. Requirement #45 and #46 SCN0005, C3	Issue: Delete specific requirements 45 and 46. Please replace these requirements with the following 2 requirements. 1) Determine sulfur dioxide concentration in stack gases using the methods in LAC 33:III.1503.D.Table 4. Use these methods for initial compliance determinations and for additional compliance determinations for those facilities not subject to continuous emission monitoring. Compliance with 40 CFR 75.11(d)(2) shall be determined as compliance with this specific condition. [LAC 33:III.1503.D.1] 2) Permittee shall demonstrate compliance by monitoring input sulfur and calculating sulfur dioxide emissions. [LAC 33:III.1511.C]. Reason: The unit has SO_2 fuel flow monitoring and Fuel analyses that can prove compliance with Chapter 15 standards per 1503.D.3. Entergy's Sterlington Plant (AI 19483) has the above 2 requirements instead of the Michoud #45 and 46 requirements.	Change made.
Specific Requirements, page 6 of 11. Requirement #50 SCN0005, C3	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance testing.	Change made.

Specific Requirements, page 6of 11. Requirement #56 and #57 SCN0005, C3	Issue: Delete specific requirements 56 and 57. Please replace these requirements with the following 2 requirements. 1) Determine sulfur dioxide concentration in stack gases using the methods in LAC 33:1II.1503.D.Table 4. Use these methods for initial compliance determinations and for additional compliance determinations for those facilities not subject to continuous emission monitoring. Compliance with 40 CFR 75.11(d)(2) shall be determined as compliance with this specific condition. [LAC 33:III.1503.D.1] 2) Permittee shall demonstrate compliance by monitoring input sulfur and calculating sulfur dioxide emissions. [LAC 33:III.1511.C]. Reason: The unit has SO2 fuel flow monitoring and Fuel analyses that can prove compliance with Chapter 15 standards per 1503.D.3. Entergy's Sterlington Plant (AI 19483) has the above 2 requirements instead of the Michoud #56 and 57 requirements.	Change made
Specific Requirements, page 7 of 11. Requirement #61 SCN0006, C2A and C2B	Issue: Need to delete Method 7E and the NOx testing requirement. Reason: The unit has NOx CEMS. Entergy respectfully requests that CEMS data be permitted to show compliance in lieu of performance testing.	Change made
Emission Rates for Criteria Pollutants Table Page 1 of 1 EQT007 Unit 3	Issue: The PM10 Average lbs/hr should be 304.75 lbs/hr and the Maximum lbs/hr should be 365.70 lbs/hr.	Change made based on additional information received 8/22/2008.

Emission rates for TAP/HAP & Other pollutants. Page 1 of 9, EQT 0003, C1A	Change the emission rates for following pollutants as follows: pollutant Avg lb/hr Max lb/hr Benzene 0.001 0.001 Also insert Polycyclic Organic Matter (POM) Avg lb/hr = 0.005, Max lb/hr = 0.006, and TPY = 0.02	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Page 1 of 9, EQT 0004, C1B	Change the emission rates for following pollutants as follows: Benzene TPY = 0.01 Selenium (and compounds): Avg lb/hr = 0.003, Max lb/hr = 0.003, TPY = 0.01	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Pages 2 and 3 of 9, EQT 0005, C2A	Change the **Maximum Hourly** emission rates for following pollutants as follows: Antimony (and compounds): 0.06 Arsenic (and compounds) : 0.01 Cadmium (and compounds): 0.004 Cobalt compounds: 0.07 Formaldehyde: 0.36 Manganese (and compounds): 0.03 Nickel (and compounds): 0.93 Phosphorus: 0.10 Polycyclic Organic Matter (POM): 0.01 Selenium: 0.007 Toluene: 0.07 Zinc (and compounds): 0.32 n-Hexane: 2.79	Change made based on additional information received 8/22/2008

Emission rates for TAP/HAP & Other pollutants. Pages 2 and 3 of 9, EQT 0005, C2A	Change the **Annual Tons Per Year** emission rates for the following pollutant: Benzene: 0.01	Change made based on additional information received 8/22/2008.
Emission rates for TAP/HAP & Other pollutants. Page 3 of 9, EQT 0006, C2B	Change the **Maximum Hourly** emission rates for following pollutants as follows: Antimony (and compounds): 0.06 Arsenic (and compounds) : 0.01 Cadmium (and compounds): 0.004 Cobalt compounds: 0.07 Formaldehyde: 0.36 Manganese (and compounds): 0.03 Nickel (and compounds): 0.93 Phosphorus: 0.10 Polycyclic Organic Matter (POM): 0.01 Selenium (and compounds): 0.007 Toluene: 0.07 Zinc (and compounds): 0.32 n-Hexane: 2.79	Change made based on additional information received 8/22/2008.
Emission rates for TAP/HAP & Other pollutants. Page 3 of 9, EQT 0006, C2B	Change the **Annual Tons Per Year** emission rates for the following pollutant: Benzene: 0.01 Dichlorobenzene: 0.01	Change made based on additional information received 8/22/2008.
Emission rates for TAP/HAP & Other pollutants. Pages 3 and 4 of 9, EQT 0007, C3	Change the **Maximum Hourly emission** rates for following pollutants as follows: Arsenic (and compounds): 0.07 Barium (and compounds): 0.13 Chromium VI (and compounds): 0.04 Cobalt compounds: 0.31 Ethyl benzene: 0.003 Formaldehyde: 1.65 Lead compounds: 0.08 Manganese (and compounds): 0.15 Mercury (and compounds): 0.006 Naphthalene: 0.06 Nickel (and compounds): 4.22	Change made based on additional information received 8/22/2008.

	Selenium (and compounds): 0.03 Toluene: 0.31 Xylene (mixed isomers): 0.005 Zinc (and compounds): 1.45 n-Hexane; 13.2	
Emission rates for TAP/HAP & Other pollutants. Page 4 of 9, EQT 0007, C3	Change the **Annual Tons Per Year** emission rates for following pollutants as follows: Benzene: 0.03 Dichlorobenzene: 0.03 n-Hexane: 24.1 The change will be made	Change made based on additional information received 8/22/2008.
Emission rates for TAP/HAP & Other pollutants. Page 4 of 9, SCN0001, C1A and C1B	Issue: Lead compounds should not be listed.	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Page 5 of 9, SCN0002, C1A and C1B	Change the **Maximum Hourly emission** rate for following pollutant as follows: Arsenic (and compounds): 0.01	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Page 5 of 9, SCN0002, C1A and C1B	Change the **Annual Tons Per Year** emission rate for following pollutant as follows: Cadmium (and compounds): 0.01	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Pages 5 and 6 of 9, SCN0003, C2A and C2B	Change the **Maximum Hourly emission** rates for following pollutants as follows: Benzene: <0.01 Formaldehyde: 0.23 n-Hexane: 5.60	Change made based on additional information received 8/22/2008

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Emission rates for TAP/HAP & Other pollutants. Pages 5 and 6 of 9, SCN0003, C2A and C2B	Change the **Annual Tons Per Year** emission rates for following pollutants as follows: Benzene: 0.02 Cadmium (and compounds): 0.01	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Pages 6 and 7 of 9, SCN0004, C3	Change the **Maximum Hourly emission** rates for following pollutants as follows: Formaldehyde: 0.55 n-Hexane: 13.20	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Page 7 of 9, SCN0005, C3	Change the **Maximum Hourly emission** rates for following pollutants as follows: 1,1,1-Trichloroethane: 0.01 Antimony (and compounds): 0.26 Arsenic (and compounds): 0.07 Barium (and compounds): 0.13 Cadmium (and compounds): 0.02 Cobalt compounds: 0.31 Copper: (and compounds) 0.09 Formaldehyde: 1.65 Lead compounds: 0.08 Manganese (and compounds): 0.15 Nickel (and compounds): 4.22 Phosphorus: 0.47 Polycyclic Organic Matter (POM): 0.06 Toluene: 0.31 Zinc: 1.45	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Page 7 of 9, SCN0005, C3	Change the **Annual Tons Per Year** emission rate for following pollutant as follows: 1,1,1-Trichloroethane: 0.04	Change made based on additional information received 8/22/2008
Emission rates for TAP/HAP & Other pollutants. Pages 7 and 8 of 9, SCN0006, C2A and C2B	Change the **Maximum Hourly emission** rates for following pollutants as follows: Antimony (and compounds): 0.12 Cobalt compounds: 0.14 Copper: (and compounds) 0.09 Formaldehyde: 0.72 Manganese (and compounds): 0.06	Change made based on additional information received 8/22/2008

Emission rates for TAP/HAP & Other pollutants. Page 7 of 9, SCN0005, C3	Nickel (and compounds): 1.85 Phosphorus: 0.20 Toluene: 0.14 Zinc (and compounds): 0.64 Change the **Annual Tons Per Year** emission rate for following pollutant as follows: Copper (and compounds): 0.12	Change made based on additional information received 8/22/2008.

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