Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Lafayette Utilities System**	**AI #:**	**119640**	**TEMPO Activity No:**	**PER20060001**
Facility Name:	**T.J. Labbe Electric Generating Station**	**Remarks Submitted by:**	Brian Nelson and Amy Hacker of RW Beck		
Permit Writer:	**Traci Green**	**Permit Writer Email address:**	**Traci.green@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 Permit 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 the 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.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Letter, Cover Letter	**Due to the addition of GRP0001 Specific Requirements 1, 2 and 3 and associated requirements, such as a public notice period, it is our understanding that the permit will expire five years from the date it is issued in 2008, for an expiration date in 2013.**	**Expiration date changed to 2013.**
Permit Letter, III	**The annual SO2 facility wide emissions 'after' should be 8.25 tons/year instead of 8.23 tons/year.**	**Spreadsheet rounding issue. Calculation requested and received. Emission rate changed.**
Permit Letter, III	**Following the estimated TAPS emission table include the following statement (for clarity):** "Note: TAPS estimated emissions are calculated based on total annual fuel consumption of 5,712,000 MMBtu/year."	**'TAPS estimated emissions are calculated based on total annual fuel consumption of 5,712,000 MMBtu/year" added to the emission table.**
Permit Letter, IV	**The first paragraph in this section should read as follows: "This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, and New Source Performance Standards (NSPS). Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants**	**Wording changed.**

	(NESHAP) do not apply.	
Permit Letter, VI	Due to the addition of GRP0001 Specific Requirements 1, 2 and 3, it was our understanding that a public notice period is now required.	Public Notice section added to the draft permit.
Permit Letter, IX	The reference for Unit EG-1 should be identical to that for Unit MG-1: LAC 33:III.501.B5.,B.32, and A.3.	Additional references added.
Statement of Basis	In the heading on all six pages, 'T.J. Labbe Electric Generating Station' should replace 'North Generating Station'.	Heading changed.
Statement of Basis, I	Replace 'North Generating Station' with 'T.J. Labbe Electric Generating Station'.	Heading changed.
Statement of Basis, II	Delete second 'is' in first sentence.	Correction made.
Statement of Basis, III, Permitted Air Emissions	The annual SO2 facility wide emissions 'after' should be 8.25 tons/year instead of 8.23 tons/year.	Spreadsheet rounding issue. Calculation requested and received. Emission rate changed.
Statement of Basis, III, LA Air Quality Regulations and NSPS	Correct the word 'both' at the beginning of the last sentence.	Correction made.
Statement of Basis, VII	Replace 'North Generating Station' with 'T.J. Labbe Electric Generating Station'.	Change made.
Emission Rates for Criteria Pollutants	The hourly average emission rate for SO2 should be 1.88 lb/hr instead of 1.69 lb/hr and the annual emission rate for SO2 should be 8.25 tons/year instead of 7.42 tons/year.	Spreadsheet rounding issue. Calculation requested and received. Emission rate changed.
Emission Rates for TAP/HAP & Other Pollutants	The average hourly emissions for GRP0001 Turbine CAP are incorrect. Based on the maximum annual emissions and 8760 hours per year, the correct average emissions are provided attached to this Worksheet.	Avg lb/hr recalculated based on 8760 hr/yr.
Specific Requirement #1	Please reword requirement to clarify that modifications are not required for the existing CEMS and to clarify that the annual limit is a 12-month rolling total. Please reword as follows and note that suggested changes are italicized. "*Existing* CEMS *shall be* used to continuously monitor the emissions of nitrogen oxides for *each* turbine. Noncompliance with the combined turbine emission limitation of 241.37 tons per year *(12-month rolling total)* is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the NOx emissions exceed the maximum listed in this Combustion Turbine CAP."	Change made.
Specific Requirement #2	The wording of the requirement is a bit awkward and confusing. We would like to clarify that there is no intent in this requirement to install monitors in addition to the existing CEMS and plant monitoring systems. Additionally, lots of equipment and operational data is monitored and kept for the facility within the plant control system historian as well as in the CEMS, so we would like to clarify that the required monitoring data is for the purpose of determining NOx emissions. Furthermore, to	Requirement modified.

	ensure no misunderstandings with respect to the word "continuous", other continuously monitored data should be held to the same standard as a CEMS. We have made suggested changes in italic. "Equipment/operational data *from existing monitors, applicable for the determination of cumulative NOx emissions from each turbine, shall be continuously* monitored *in according to applicable CEMS standards* by technically sound method*ology*. These records *shall be maintained* on site for a minimum of three years and *made* available, upon request, for inspection by DEQ *personnel*."	
Specific Requirement #3	**The wording of the requirement is a bit awkward and confusing. We have made suggested changes in italic.** "Equipment/operational data *referenced in Specific Requirement #2, shall be kept electronically or by hard copy on a monthly basis. These records shall be made available, upon request, for inspection by DEQ personnel.*"	**Requirement changed to: Equipment/operational data from existing monitors, applicable for the determination of cumulative NOx emissions from each turbine, shall be kept electronically or by hard copy on a monthly basis. These records shall be made available, upon request, for inspection by DEQ personnel.**
Specific Requirement #4	**Note that referencing in 40 CFR 60 Subpart GG was changed following the July 8, 2004 Final Rule which substantially revised Subpart GG. Reference to 40 CFR 60.334(b)(2) appears to reference the pre-2004 version which makes reference "fuel supplied without intermediate bulk storage."** **40 CFR 60.332(a)(3) of the current Subpart GG specifically states that "the use of F in paragraphs (a)(1) and (2) of this section is optional" and that "the owner or operator may choose to apply a NOx allowance for fuel-bound nitrogen". These options were not specifically provided in the pre-2004 version so reference to the ADI policy was necessary to show compliance. Since the current Subpart GG specifically provides this optional use of the NOx emissions allowance for fuel bound nitrogen, it is NOT a requirement to monitor fuel for nitrogen content and reference to the ADI policy is not necessary. Therefore, we do not believe that Specific Requirement #4 is necessary as stated. We suggest changing Specific Requirement #4 as follows:** *[40 CFR 60.332(a)(1)]* *"No owner or operator shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of the applicable allowable standard."*	**After speaking with Brian Nelson on 1/25/08, this comment was a request to remove specific requirement #4.**
Specific Requirements, #7	**Replace 'North Generating Station' with 'T.J. Labbe Electric Generating Station'.**	**Facility name changed.**
Specific Requirements, #7	**The reference to 40 CFR 60.334(b)(2) appears to be for the pre-2004 version of Subpart GG. Please change this reference to 40**	**Citation updated.**

	CFR 60.334(h)(3)(ii). Additionally, please remove the reference to the "[EPA approved proposed alternative...]" since this reference is no longer necessary.	
Specific Requirements, #8	**Pursuant to the referenced requirement [40 CFR 60.334(b)], a waiver and a reference to the ADI document is no longer necessary. We suggest changing Specific Requirement #8 as follows"** *"Each combustion turbine stack shall be equipped with a continuous emission monitoring system (CEMS) to monitor NOx which meets the requirements of 40 CFR 75 "*	**Removed original SR #8 and Added the two requirements below:** **Oxygen and Nitrogen oxides monitored by continuous emission monitor (CEM) continuously as specified in 40 CFR 60.334(b)(1) through (b)(3). Subpart GG. [40 CFR 60.334(b)]** **Oxygen and Nitrogen oxides recordkeeping by continuous emission monitor (CEM) continuously as specified in 40 CFR 60.334(b)(1) through (b)(3). Subpart GG. [40 CFR 60.334(b)]**
Specific Requirements, #11	**Reference to the "EPA approved proposed alternative with Control Number 0000031" is no longer necessary. We suggest changing Specific Requirement #11 as follows:** *"The standard for sulfur dioxide emissions will be determined through fuel monitoring as described in 40 CFR 60.334."*	**EPA approved proposed alternative with Control Number 0000031 removed from the requirement.**
Specific Requirements, #12	**The wording of this requirement seems to imply that all excess emission reports (pursuant to 40 CFR 60) are due quarterly. Instead, we are of the understanding that excess emission reports are only due on a quarterly basis if an ice fog event occurs. To avoid such confusion, we recommend using the exact language from applicable reference [40 CFR 60.334(j)(3)].** *"Submit quarterly excess emission report: Ice Fog: Each period during which an exemption provided in §60.332(f) is in effect shall be reported in writing to the Administrator quarterly. For each period the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated shall be reported. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter."*	**Requirement changed to the following:** **Submit quarterly excess emissions report for Ice Fog: Postmarked by the 30th day following the end of each calendar quarter. Report periods during which an exemption provided in 40 CFR 60.332(f) is in effect. Report the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated. Subpart GG**
Specific Requirements, #13	**Permitted facility emissions have not been determined on the basis of any alternative or emergency fuels. Therefore, specifying this reference from Subpart GG is probably not applicable or necessary.**	**LUS does not use any alternative or emergency fuels. Requirement removed from the permit.**
Specific Requirements, #14	**Specific Conditions 2 and 3 for EQT1 and EQT2 of the previous permit clearly indicated that 40 CFR 60.7(c) excess emission report were due following each six-month period. To avoid any confusion, we suggest inserting this clarification as follows (in italics):** "Submit excess emissions reports and monitor downtime *by the 30th day following the end of each six-month period* in accordance with 40 CFR 60.7(c). Report excess emissions for all periods of unit	**Requirement changed to include specified time frame.**

	operation, including startup, shutdown and malfunction."	
Specific Requirements, #16	**Note that NOx compliance will be determined by the CEMS on an on-going basis. Reference [40 CFR 60.335(b)(7)] specifically addresses INITIAL performance testing. Please insert the word "initial" into the requirement as indicated below (in italics). Also remove the reference to the "EPA approved proposed alternative with control number 0000063" as it is no longer necessary.** "Nitrogen oxides: Pursuant to the requirements of the air quality permit, NOx emissions *initial* compliance will be demonstrated for each unit firing gas at or near base load utilizing Method 7E results measured during the Relative Accuracy Test Audit for the 40 CFR 75 CEMS certification. Therefore, *initial* compliance with the NOx standard will be demonstrated from the average of 9 to 12 test runs of at least 21 minutes each. [40 CFR 60.335(b)(7), 40 CFR 75]"	**Reference removed.** **Requirement changed for clarity.**
Specific Requirements, #28	**By reading this requirement as proposed, one may get the impression that an opacity monitor must be installed on the turbine stacks. Opacity monitors are not required for this facility. To avoid this potential confusion, please add the following statement at the end of the requirement.** *"The units currently qualify as gas-fired, as defined in 40 CFR 72.2. Pursuant to 40 CFR 75.14.(c), the installation of opacity monitors will only be required if the units no longer qualify as gas-fired."*	**Requirement changed to the following:** **As long as the units qualify as gas-fired, as defined in 40 CFR 72.2, COMS are not required however, pursuant to 40 CFR 75.14.(c), the installation of opacity monitors will be required if the units no longer qualify as gas-fired.**
Specific Requirements, #30	**The reference does not appear to be correct. Please update the reference as follows:** **[40 CFR 75.11(d)(2)]**	**Citation corrected.**
Specific Requirements, #32	**The reference does not appear to be correct. Please update the reference as follows:** **[40 CFR 75.60(b)]**	**Citation corrected.**
Specific Requirements, #33	**The reference does not appear to be correct. Please update the reference as follows:** **[40 CFR 75.60(b).(6)]**	**Citation corrected.**
Specific Requirements, #34	**The reference does not appear to be correct. Please update the reference as follows:** **[40 CFR 75.10.(f)]**	**Citation corrected.**
Specific Requirements, #35	**The reference includes the word "average" and a reference to applicable measurement methods under LAC 33:III.1503.D.2, Table 4. Average visible opacity should be measured according to EPA Method 9 and should be comprised of a 6-minute average. We suggest the following changes:** "Opacity *(average)* <= 20 percent *(see LAC 33:III.1503.D.2, Table*	**This is standard language for chapter 11 regarding opacity. No changes made.**

	4), except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. Statistical Basis: *Six-minute average*"	
Specific Requirements, #39	**This is the same requirement as Specific Requirement #20. We recommend removing this requirement.**	**Duplicate requirement removed.**
Specific Requirements, #43	**To avoid confusion and to be consistent with the terminology of Condition R.3 of the 40 CFR 70 General Conditions, we would rather refer to this report as the "quarterly deviation report" rather than the "excess emission report". We suggest changing the first few words of this requirement as follows:** "Submit Title V *deviation report:...* "	**This is standard language. No changes made.**