Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Louisiana Generating, LLC	**AI #:**	11917	**TEMPO Activity No:**	PER20080005
Facility Name:	Big Cajun I Power Plant	**Remarks Submitted by:**	**Gary Ellender**		
Permit Writer:	Dustin Duhon	**Permit Writer Email address:**	dustin.duhon@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.
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Permit Reference	Remarks	Air Permits Division Response (for official use only)
INVENTORIES		
Page 3	Under Annual Maintenance Fee – What is the 458? The initial Title-V had one (the 470 multiplier).	Due to a recent upgrade of LDEQ's TEMPO database, some data was not transferred correctly. However, upon further fiscal review, it has been determined that the incorrect fee code multiplier was entered for the currently effective permit. The draft will be revised to reflect 230 MW of generating capacity under Fee Code 1400 and 240 MW of generating capacity under Fee Code 1420.
SPECIFIC REQUIREMENTS		
Conditions 5, 9, 18, 27, 28 and 35	How do we reconcile the old Subpart Da requirements with the fact that CAMR has been revoked?	The vacature of the CAMR rule has no effect on the applicability of the mercury provisions of 40 CFR 60 Subpart Da.
Condition 154	Condition 154 was removed from the initial Title V. The same condition remains for Boiler 2 (see condition 166 of new T-V)	The condition was removed.
Condition 429	E and M are not defined. It's assumed they are for biomass. They need to be defined.	The inclusion of these factors is an error on the part of LDEQ. LDEQ has determined that since the biomass proposed for use by the applicant has a negligible mercury content, no emission factor

		will be utilized for biomass. The emission limitations for all proposed fuels are properly represented.
TITLE V		
Page 7	In the emissions limitations table, biomass should be included as part of the mercury portion	LDEQ has determined that since the biomass proposed for use by the applicant has a negligible mercury content, no emission factor will be utilized for biomass. The emission limitations for all proposed fuels are properly represented.
Page 7	In the emissions limitations table, on the Metallic HAPs line, the averaging period is listed as 24 hr. avg. How do we demonstrate compliance when we only have to conduct three 1-hr stack tests for PM?	Specific Condition 432 states that the permittee shall comply with all applicable provisions of 40 CFR 64 in order to control emissions of metallic HAPs.
STATEMENT OF BASIS		
Page 5	In the emissions limitations table, biomass should be included as part of the mercury portion	LDEQ has determined that since the biomass proposed for use by the applicant has a negligible mercury content, no emission factor will be utilized for biomass. The emission limitations for all proposed fuels are properly represented.
Page 5	In the emissions limitations table, on the Metallic HAPs line, the averaging period is listed as 24 hr. avg. How do we demonstrate compliance when we only have to conduct three 1-hr stack tests for PM?	Specific Condition 432 states that the permittee shall comply with all applicable provisions of 40 CFR 64 in order to control emissions of metallic HAPs.
Page 7 (Section V, Periodic Monitoring/Compliance Assurance Monitoring)	Third paragraph/first sentence, "of each CFB boiler" should be changed to "of the CFB boiler." Also, last paragraph, last word, "Boilers" should be "Boiler"	These changes have been made.

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Facility Name:	Big Cajun I Power Plant	**Remarks Submitted by:**	**Serugudi Mani**		
Permit Writer:	Dustin Duhon	**Permit Writer Email address:**	dustin.duhon@la.gov		

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
2260-00007-V2	**Addresses the case-by case basis for MACT determination of Mercury emissions. Capital Regional Office has no technical comments on this permit.**	