# Worksheet for Technical Review of Working Draft of Proposed Permit

| | | | | | |
|---|---|---|---|---|---|
| **Company Name:** | Southwest Electric Power Company (SWEPCO) | **AI #:** | 1060 | **TEMPO Activity No:** | PER20070006<br>PER20070004<br>PER20070003<br>PER20080001 |
| **Facility Name:** | Arsenal Hill Power Station / J. Lamar Stall Unit # 1 | **Remarks Submitted by:** | **Kris Gaus** | | |
| **Permit Writer:** | **Christopher Smith** | **Permit Writer Email address:** | **Christopher.smith@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.

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
|---|---|---|
| Title V Permit cover letter | Correct the mailing address for Carl to 510 North Allen, Shreveport LA 71101 | The recommended change has been made as requested. |
| Air Permits Briefing Sheet, Page 3, BACT Table, NOx | Change to "Meet a 4 ppmvd at 15% oxygen limit (annual average) by" | The recommended change has been made as requested. |
| Air Permits Briefing Sheet, Page 3, BACT Table, CO | Change to "Meet a 10 ppmvd at 15 percent oxygen limit (annual average) at" | The recommended change has been made as requested. |
| Air Permits Briefing Sheet, Page 5, criteria emission table, "Change" column | For SO2, change from 81.77 to 106.32. | The recommended change has been made as requested. |
| Air Permits Briefing Sheet, Page 5, criteria emission table, "Change" column | For CO, change from 523.68 to 523.28. | The recommended change has been made as requested. |
| Air Permits Briefing Sheet, Page 5, VOC Speciation table | Change the total from 8.94 to 9.00. | The recommended change has been made as requested. |

| | | |
|---|---|---|
| Air Permits Briefing Sheet, Page 7, Section IX, Insignificant Activities Table | Add "Piping Fugitives" to the table. | Piping Fugitives are not listed as an Insignificant Activity under LAC 33:III.501.B.5.Table A, B, or C. SWEPCO did not provide any calculations indicating §501.C.B.5.Table D applies to Piping Fugitives. |
| Air Permits Briefing Sheet, Page 12, XI Table 2, Subpart YYYY | Change Notes to "DOES NOT APPLY. The Arsenal Hill Power Plant/J. Lamar Stall Unit #1 site is not a major source of HAP emissions." | The notes section has been amended to include the language that the Arsenal Hill Power Plant/J. Lamar Stall Unit #1 site is not a major source of HAP emissions. |
| Statement of Basis, Page 1 *Section I* | Correct Applicant Address to Southwestern Electric Power Co., *P.O. Box 660164, Dallas TX 75266-0164.* | The recommended change has been made as requested. |
| Statement of Basis, Page 5, Emission Table | For SO2, change from 81.77 to 106.32. | The recommended change has been made as requested. |
| Statement of Basis, Page 5, Emission Table | For CO, change from 523.68 to 523.28. | The recommended change has been made as requested. |
| Statement of Basis, Page 5, VOC Speciation table | Change the total from 8.94 to 9.00. | The recommended change has been made as requested. |
| Statement of Basis, Page 10, XI Table 2, Subpart YYYY | Change Notes to "DOES NOT APPLY. The Arsenal Hill Power Plant/J. Lamar Stall Unit #1 site is not a major source of HAP emissions." | The notes section has been amended to include the language that the Arsenal Hill Power Plant/J. Lamar Stall Unit #1 site is not a major source of HAP emissions. |
| Statement of Basis, Page 12, , BACT Table, NOx | Change to "Meet a 4 ppmvd at 15% oxygen limit (annual average) by" | The recommended change has been made as requested. |
| Statement of Basis, Page 12, BACT Table, CO | Change to "Meet a 10 ppmvd at 15 percent oxygen limit (annual average) at" | The recommended change has been made as requested. |
| Statement of Basis, Page 13, Max. Emission Rate table | Change NOx limit to "Meet a 4 ppmvd (annual average) at 15% oxygen limit" | The recommended change has been made as requested. |
| Statement of Basis, Page 13, Max. Emission Rate table | Should the Fuel Gas Preheater be included in this table? | The fuel gas preheater is included in this table because BACT does apply to the preheater and to its emissions. |
| Statement of Basis, Page 16, Periodic Monitoring, 2nd paragraph | Remove this paragraph as these requirements are not applicable since neither steam or water injection is used for NOx control. Compliance with the NOx limit is demonstrated with a CEMS. | The recommended change has been made as requested. |
| Statement of Basis, Page 16, Periodic Monitoring, 3rd paragraph | Add to the end of the paragraph ", or meet the exemption in 60.4365 by having a current, valid purchase contract, tariff sheet *or transportation contract for the fuel, specifying that the* maximum total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 standard cubic feet. | The recommended change has been made as requested. |
| PSD Permit, Cover letter | Correct the mailing address for Carl to 510 North Allen, Shreveport LA 71101 | The recommended change has been made as requested. |
| PSD Permit, Cover letter, page 2 | Correct Applicant Address to Southwestern Electric Power Co., P.O. Box 660164, Dallas TX 75266-0164. | The recommended change has been made as requested. |
| PSD Permit, Page 3, BACT section | For NOx, change to "BACT is to meet a 4 ppmvd (annual average) @ 15% O2 limit" | The recommended change has been made as requested. |
| PSD Permit, Page 7 | Correct Applicant Address to Southwestern Electric Power Co., P.O. Box 660164, Dallas TX 75266-0164. | The recommended change has been made as requested. |

| | | |
|---|---|---|
| PSD Permit, Page 7, Combustion Technology/Design and Proper Operation paragraph, line 4 | Correct typo from "asd" to as. | The recommended change has been made as requested. |
| PSD Permit, Page 12, Selective Catalytic Reduction (SCR), 2nd paragraph | Change to "meet the 4 ppmvd (annual average) at 15% oxygen limit" | The recommended change has been made as requested. |
| PSD Permit, Page 17, Section B | In the third and fifth paragraphs remove the word "Screen" and replace it with "Aermod." | The recommended change has been made as requested. |
| PSD Permit, Page 19, 1st paragraph, second line | Change to "), predicted to occur at the plant boundary." | The recommended change has been made as requested. |
| PSD Permit, Page 21, Max. Allowable Emission Rate table | Should the Fuel Gas Preheater be included in this table? | The fuel gas preheater is included in this table because BACT does apply to the preheater and to its emissions. |
| PSD Permit, Page 21, Max. Allowable Emission Rate table | For NOx change to "Meet a 4 ppmvd (annual average) at 15% Oxygen limit." | The recommended change has been made as requested. |
| PSD Permit, Page 30, Table 2 | Change the PM10 Maximum Modeled Concentration from 21.87 to 21.7. | The recommended change has been made as requested. |
| Acid Rain Permit | Change footnote to "Monitor(s) must be certified no later than 90 unit operating days or 180 calendar days whichever comes first after commencement of commercial operation. See 40 CFR 75.4(b)(2)." | The recommended change has been made as requested. |
| Acid Rain Permit and CAIR Permit | Correct the address on both Permits to 1 Riverside Plaza, Columbus OH 43215. | The recommended change has been made as requested. |
| Specific Requirements, pages 2, 3, 5 and 6 | For CTG-1 and 2 remove specific requirements 13, 20, 21, 38, 45 and 46. Compliance with the NOx limit is demonstrated using the CEMS not by using a parameter monitoring plan. | The recommended change has been made as requested. |
| Specific Requirements, page 23 | Specific Requirement 22 citation needs corrected to 75.10(d). | The recommended change has been made as requested. |
| Specific Requirements, pages 3 and 6 | In Specific Requirements 26 and 51 the NOx limit needs to be changed to 4 ppmvd (annual average) at 15% Oxygen. | The recommended change has been made as requested. |
| Emission Rates for TAP/HAP & Other Pollutants table | The acetaldehyde tons/yr in SCN 0010 and SCN 0014 should be changed to 0.33. The formaldehyde avg. and max. lb/hr in SCN 0010 and 0014 should be changed to 0.42. The toluene avg. and max. lb/hr in SCN 0010 and 0014 should be changed to 0.26. The xylene avg. and max. lb/hr in SCN 0010 and SCN 0014 should be changed to 0.13. | The recommended change has been made as requested. |
| EMISSION RATES FOR CRITERIA POLLUTANTS Table – footnotes, page 2 | Remove from the footnotes the "180 hours" so it is not interpreted in the future by the LDEQ that the units have an limit on how many hours of startups and shutdowns can occur and that they are only limited by the 12 month tpy limits. | The recommended change has been made as requested. |