Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Acadia Power Partners LLC	**AI #:**	83623	**TEMPO Activity No:**	PER20050001&2 and 20070001&2
Facility Name:	Acadia Power Station	**Remarks Submitted by:**	Robert Knott, CLECO		
Permit Writer:	Rusty J. Jack	**Permit Writer Email Address:**	rusty.jack@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)
Air Permit Briefing Sheet Cover letter	The Plant manager needs to be changed to Russ Snyder.	The change has been made.
Part 70 Permit, Air Permit Briefing Sheet – Section I (Background)	The listed permit PSD-LA-645 (M-2) needs to be changed to PSD-LA-645 (M-1).	This change has been made.
Part 70 Permit, Air Permit Briefing Sheet – Section III (Description)	Change the last sentence in the 2nd paragraph sentence to state, The duct burner is used to provide supplemental firing capability.	This change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Part 70 Permit, Air Permit Briefing Sheet – Section III (Description)	The last sentence in the 4th paragraph states at loads lower than 50% hourly emission rates can comply with the permit limits. The SU/SD is defined as less than 50% turbine load. The sentence needs to be changed to reflect loads from 50% and above.	The last sentence has been removed from the paragraph.
Part 70 Permit, Air Permit Briefing Sheet – Section III (Description)	The proposed changes state to remove minimum load requirements as long as permit limits are not exceeded. I did not see any minimum load changed. Should this be deleted ?	The statement has been removed.
Part 70 Permit, Air Permit Briefing Sheet – Section III (Description)	**Estimated Emissions in tons per year** PM10 tons before and after should be 352.2. The change is listing -3.10 tons when there is actually no change. (SCN 0006 – 0009 + EQT 0009 + EQT 0010 + SCN 0005)	The change has been made.
Part 70 Permit, Air Permit Briefing Sheet – Section IV (Type of Review)	**Type of Review** Remove Carville Energy Center. Acadia was never listed as Carville Energy Center (Carville is another Calpine facility that must have been listed while Calpine worked on the renewal).	This change has been made.
Part 70 Permit, Air Permit Briefing Sheet – Section IV (Type of Review)	**Type of Review** The listed permit PSD-LA-645 (M-2) needs to be changed to PSD-LA-645 (M-1).	This change has been made.
Part 70 Permit, Air Permit Briefing Sheet – Section X (Table 1)	**LAC 33:III.Chapter** Only FUG 1 is subject to Chapter 21 as listed in the specific requirements. UNF1 needs to be removed from any applicability to Chapter 21, the 1 needs to be removed from UNF 1.	The change will not be made. LAC 33:III.2113.A applies to the facility.
Part 70 Permit, Air Permit Briefing Sheet – Section XI (Table 2)	**Standards of Performance for Stationary Gas Turbine** 2nd paragraph citation should be 40 CFR 60.334 (c). Acadia does not use steam or water injection.	This change has been made.
Part 70 Permit, General Information	**Also Known As** 1. The ID LAG670055 has expired and was not renewed by Acadia. Acadia submitted a Notice of Termination to LDEQ. 2. The AI ID for Acadia is 83623. The ID 83634 should be removed or changed to 83623.	The company may contact Mr. David Ferrand in the Air Permits Support Group by phone at (225) 219 – 3284 or via email at david.ferrand@la.gov to correct this information.
Part 70 Permit, General Information	**Main Phone** Change 318-427-1765 to 337-546-1500.	The change has been made.

LDEQ-EDMS Document 41348591, Page 82 of 276

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Part 70 Permit, General Information **Part 70 Permit, General Information (continued)**	**Related People** 1. Replace all of the billing party contacts with CLECO Corp – Environmental Services Department. The phone no. needs to be change to 318-484-7753 and email address needs to be changed to robbie.laborde@cleco.com. The address need to be changed to Environmental Manager PGO6 2030 Dohanue Ferry Road Pineville, LA 71360. 2. All of the Eunice PO Box mailing addresses need to be changed to 30385 Crowley Eunice Hwy. Eunice, LA 70535. 3. **Emissions Inventory Contact and replace her with Paul T ?? The phone no. needs to be change to 318-484-???? and email address needs to be changed to ????.????@cleco.com.** The address needs to be changed to 2030 Dohanue Ferry Road Pineville, LA 71360. 4. Remove Diana Naylor from this section. 5. Remove Jan Stavinoha from the Air Permit Contact and replace her with Paul Turregano. The phone no. needs to be change to 318-484-7413 and email address needs to be changed to paul.turregano@cleco.com. The address needs to be changed to 2030 Dohanue Ferry Road Pineville, LA 71360 6. Remove Jan Stavinoha from the Water Permit Contact and replace her with Brent Croom. The phone no. needs to be change to 318-484-7742 and email address needs to be changed to brent .croom@cleco.com. The address needs to be changed to 2030 Dohanue Ferry Road Pineville, LA 71360 7. Remove Dave Thomas from the Responsible Official and replace him with Russ Snyder. The phone no. needs to be change to 337-546-1507 and email address needs to be changed to russ.snyder@cleco.com. The address needs to be changed to 30385 Crowley Eunice Hwy. Eunice, LA 70535.	The changes have been made.
Emission Rates for Criteria Pollutants	**SCN 0006, SCN 0007, SCN 0008, SCN 0009** 1. Replace the CO Avg lb/hr of 1225 with 70 lb/hr. 2. Replace the NOx Avg lb/hr of 190 with 32 lb/hr. 3. Replace the SO2 Max lb/hr of 1.20 with 29 lb/hr. 4. Replace the VOC Avg lb/hr of 28 with 3 lb/hr.	The changes have been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Pollutants	**SCN 0005 DBS CAP** 1. Remove the CO Avg lb/hr 24.84 lb/hr cap. 2. Remove the NOx Avg lb/hr 24.84 lb/hr cap. 3. Remove the PM10 Avg lb/hr 3.10 lb/hr cap. 4. Remove the SO2 Avg lb/hr 4.60 lb/hr cap. 5. Remove the VOC Avg lb/hr 6.21 lb/hr cap.	No change will be made. Though operating in excess of average pound per hour rates for short periods of time may not constitute a permit violation (provided that emissions are compliant with maximum pound per hour rates), long-term operation in excess of average rates may result in a violation of an annual ton per year limit. Average pound per hour rates are enforceable provisions of the permit and will be retained. The department also wants to emphasize that average pound per hour rates are not unique to Acadia Power Station permit, but appear in all Title V permits issued to major sources in Louisiana.
Specific Requirements	**Table 1 and 2 both indicate that Chapter 15 is exempt for EQT 05 – 08 and EQT 11 – 14. The specific requirements for these sources need to remove listing any applicability to Chapter 15**	No change will be made. Recordkeeping is still required to verify exemption from Chapter 15.
Statement of Basis, Facility and Current Permit Status (Section I)	**Applicant** Remove P.O. Box 1149 from the address.	This change has been made.
Statement of Basis, Facility and Current Permit Status (Section II)	**Facility and Current Permit Status** The unit or sources table is listing the combined cycle units as GRP. The emission rates for criteria pollutants list the units as PCS.	This change has been made.
Statement of Basis, Facility and Current Permit Status (Section III)	**Proposed Permit/Project Information (Project)** Change the last sentence in the 2nd paragraph sentence to state, The duct burner is used to provide supplemental firing capability.	This change has been made.
Statement of Basis, Facility and Current Permit Status (Section III)	**Permitted Air Emissions** PM10 tons before and after should be 352.2. The change is listing -3.10 tons when there is actually no change. (SCN 0006 – 0009 + EQT 0009 + EQT 0010 + SCN 0005)	The change has been made.
Statement of Basis, Facility and Current Permit Status (Section III)	**Applicability and Exemptions of Selected Subject Items (Standards of Performance for Stationary Gas Turbine)** 2nd paragraph citation should be 40 CFR 60.334 (c). Acadia does not use steam or water injection.	This change has been made.

LDEQ-EDMS Document 41348591, Page 84 of 276

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Facility and Current Permit Status (Section III)	**General Condition XVII Activities** This section mentions, for a list of General Condition XVII Activities, refer to Section VIII. There is no Section VIII in the Statement of Basis.	No change will be made. Section VIII is in the proposed Part 70 proposed permit. "For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit."
Statement of Basis, Facility and Current Permit Status (Section V)	**Periodic Monitoring** 5th paragraph citation should be 40 CFR 60.334 (c). Acadia does not use steam or water injection.	This change has been made.
PSD Permit	Remove Thomas Johnson and replace with Russ Snyder.	This change has been made.
PSD Permit, Briefing Sheet	**Project Description** PM10 tons before and after should be 352.2. The change is listing -3.10 tons when there is actually no change. (SCN 0006 – 0009 + EQT 0009 + EQT 0010 + SCN 0005)	The change has been made.
PSD Permit, Briefing Sheet	**Type of Review** PM/PM10 text should be removed from this section due to no change in the permitted air emissions. Refer to Project Description text above.	All reference to individual pollutants has been removed.
PSD Permit, Project Description (Section III)	**Project Description** PM10 tons before and after should be 352.2. The change is listing -3.10 tons when there is actually no change. (SCN 0006 – 0009 + EQT 0009 + EQT 0010 + SCN 0005)	The change has been made.
PSD Permit, Source Impact Analysis (Section IV)	**A. Best Available Control Technology (Normal Operation)** A sentence is needed to clarify that the 4.5 ppm BACT limit only applies during normal operations.	Sentence added to section A of the PSD. "The NOx 4.5 ppmv limit only applies during normal operations."
Specific Requirements (3, 7, 11, 15)	**PCS 0001 – 0004, Combined Cycle No. 1, 2, 3, 4** Request to allow compliance demonstration testing on only 1 of the 4 combined cycle units rather than all 4? All 4 units are identical units being the same model, make and series.	The requirements have been changed as deemed appropriate.
Specific Requirements	**Specific Requirement 27, 66, 79, 118, 131, 170, 183, 222** Chapter 15 is listed as being applicable when Table 1 and Table 2 are showing that the facility is exempt from Chapter 15.	The change will not be made. There is a requirement that state the APS has to maintain records to verify exemption from Chapter 15.
Specific Requirements	**Specific Requirement 39, 91, 143, 195** This facility does operated or contain a FGD system. This requirement should be removed from the specific requirements.	This requirement has been removed from the permit.

LDEQ-EDMS Document 41348591, Page 85 of 276

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements (5-99, 6-99, 7-99, 8-99)	**40CFR 60.48Da, 40CFR 60.49Da(f)** A boiler operating day is defined as a 24 hr operating period where fuel is combusted for the entire 24 hr period. The duct burners are used for supplemental firing and will not be operated for a 24 hr period. How will these requirements be met if we will not have boiler operating day?	Please contact the U.S. Environmental Protection Agency for guidance on this issue.
Specific Requirements (5-99, 6-99, 7-99, 8-99)	**40CFR 60.51Da** A boiler operating day is defined as a 24 hr operating period where fuel is combusted for the entire 24 hr period. The duct burners are used for supplemental firing and will not be operated for a 24 hr period. How will these requirements be met if we will not have boiler operating day?	Please contact the U.S. Environmental Protection Agency for guidance on this issue.
Specific Requirements (5-99, 6-99, 7-99, 8-99)	**40CFR 60.51Da(i)** The facility is exempt from opacity monitoring requirements as per 40 CFR 75.14 (c). This regulation requires quarterly reports for opacity excess. This should be removed from the specific requirements.	The change will not be made. 40 CFR 75.14(c) does not exempt the facility from submitting quarterly excess opacity reports under 40 CR 60.51.Da(i).
Specific Requirements (257, 258)	**UNF 0001 APS Acadia Power Station** Table 1 does not list UNF 001 to be subject to either of these specific requirements. These requirements should be removed.	These requirements have been removed from the permit.

LDEQ-EDMS Document 41348591, Page 86 of 276