Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Entergy Gulf States, Inc.**	**AI #: 9142**		**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Nelson Industrial Steam Co.**	**Remarks Submitted by:**			
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)
Air Permit Briefing Sheet	Delete Period (.) following the word "startup" under Section III Description, 2nd paragraph, 1st line.	Typo corrected.
Air Permit Briefing Sheet	In the estimated Tons Per Year Table, the emissions listed in the After Column are listed/rounded in a different manner than listed in the application. PM_{10} is listed as 196.58 versus 197.23; SO_2 is listed as 8134.60 versus 8134.58; NO_X is listed as 5903.36 versus 5903.35; VOC is listed as 35.40 versus 35.39. All except PM_{10} are probably due to rounding.	Sum of Emissions include TPY of each source including sources with <0.01TPY as the criteria limit.
Air Permit Briefing Sheet	Under Section III Description, the third paragraph addresses NISCO's requests for emission CAPs. The CAP requested for SO_2 is for routine operation periods and the CAP requested for PM is during start up. Please clarify the first sentence in the paragraph to add the words "during routine operation" . The sentence should read: ....3519.36 lb/hr maximum hourly sulfur dioxide emissions during routine operation from the two boilers during petroleum coke combustion	Changes made.

INVENTORIES	Revise the following Descriptions to read as follows • EQT001 "C1 – Unit 1A CFB Boiler Stack" • EQT002 "C2 – Unit 2A CFB Boiler Stack" • EQT004 "C3A – Limestone Dryer 1" • EQT006 "X11 – Unit 1 Cooling Tower" • EQT007 "X12 – Unit 2 Cooling Tower" • EQT008 "C3B – Limestone Dryer 2" • FUG023 "M39, M40 – Limestone Feeder System"	Changes made based on this request.
X. Table 1. Applicable Louisiana and Federal Air Quality Requirements	Revise the following Descriptions to read as follows – Change in Both State and Federal Sections. • EQT 1 "C1 – Unit 1A CFB Boiler Stack" • EQT 2 "C2 – Unit 2A CFB Boiler Stack" • EQT 4 "C3A – Limestone Dryer 1" • EQT 6 "X11 – Unit 1 Cooling Tower" • EQT 7 "X12 – Unit 2 Cooling Tower" • EQT 8 "C3B – Limestone Dryer 2" • FUG 11 "M15A, M15B, M16- Petroleum Coke Conveyor System • FUG 12 "M17 – Enclosed Coke Stackout Pile Fugitive Emission • FUG 14 The last word should be "conveyor". The word is truncated. • FUG 18 "M28, M36 – Fly Ash Silo Bin Vent #1 and Vent #2" • FUG 21 " M31, M32 – Ash Disposal Area Fugitive and Reclaim Activity Emissions • FUG 23 "M39, M40 – Limestone Feeder System"	Changes made based on this request.
EMISSION RATES FOR PRIMARY POLLUTANTS	NISCO requested an emission CAP of 3519.36 lb/hr maximum hourly SO2 emissions for Units C1 and C2 during Routine Operations. On the Rate Table the Max lb/hr for these units are left blank. This should be documented in the Rate Table. Add as a GRP Scenario for Routine Operations.	GRP 013 added to the rate table for SO2 emissions CAP for Routine operations.
EMISSION RATES FOR PRIMARY POLLUTANTS	Under Subject Item, FUG 023, the source ID (listed in small print) should be "FUG023" not "M21"	Change made.
EMISSION RATES FOR PRIMARY POLLUTANTS	For GRP 009, the TPY PM_{10} CAP is listed as 14.0. Per the EIQ sheets the requested cap for PM_{10} should be 7.39 per unit for a total of 14.78 – rounded to 14.8.	Per Renee Keys, She would like the total TPY PM_{10} CAP to be the sum of the EIQs rather than the CAP requested in the application. Change made.
GENERAL INFORMATION	The entries under Phone (Type) and Relationship are truncated and the reader is unable to read all of the e-mail address entries and titles.	Requests made in TEMPO. Unable to change format of Phone (Type) and Relationship columns. Changed RJOHN21@ENTERGY.COM to rjohn21@entergy.com to better fit the space.
SPECIFIC REQUIREMENTS **105 and 106**	EQT006 and EQT007 (specific Requirements 105 and 106) – These conditions relate to opacity determination requirements. NISCO requested and was granted relief form the specific conditions to conduct opacity determinations on cooling towers in a	Specific Requirements removed from permit based on a letter of response dated 2/28/07.

	correspondence from LDEQ dated 2/28/07 (Agency Interest No. 9142, Activity No. PER 2006002). These requirements should be removed from the Specific Requirements.	
SPECIFIC REQUIREMENTS **118**	In the heading for Specific Requirement 118, the word "Conveying" should be replaced with "Conveyor".	Change made.
SPECIFIC REQUIREMENTS **124**	In the heading for Specific Requirement 124, the word "Convey" should be replaced with "Conveyor No. 4"	Change made.
SPECIFIC REQUIREMENTS **133**	In the heading for Specific Requirement 133 the words "Feeder System" should be added to follow the word "Limestone"	Change made.
SPECIFIC REQUIREMENTS **194**	Specific Requirement 194 states that the facility must comply with the requirements of PSD Permit PSA-LA-557. The PSD permit contains specific emission limit on a pollutant basis. NISCO requests that these permit limits be listed in the Title V permit under this Specific Requirement.	PSD limits incorporated into the permit. The more stringent emission limit for each criteria is listed on the "Emission Rates for Criteria Pollutants" table.
SPECIFIC REQUIREMENTS **21 and 27**	Specific Requirements 21 and 71 require performance test for SO_2 The facility has CEMS on this pollutant. Based on this is the performance testing deemed necessary since these conditions are met by CEMS?	This facility has CEMS for SO2 on the boiler stacks therefore is not required to perform these tests. Specific requirements regarding performance testing for SO2 have been removed from the permit.
SPECIFIC REQUIREMENTS **22, 72, 138 and 154**	Specific Requirements 22, 72, 138 and 154 require performance testing for NO_X. The facility has CEMS on this pollutant. Based on this, is the performance testing deemed necessary since these conditions are met by CEMS?	This facility has CEMS for NOx on the boiler stacks therefore is not required to perform these tests. Specific requirements regarding performance testing for NOx have been removed from the permit.
SPECIFIC REQUIREMENTS **23 and 73**	Specific Requirements 23 and 73 require Performance Testing for PM but do not include a completion date. PM Performance test completed in August of 2006 for 1A and 2A as part of requirements from NISCO Title V version 0 (Jan. 2006). Is another test deemed necessary? If so, please indicate frequency (e.g. 180 days upon issuance of the permit)	Initial performance test received by the Department on September 11, 2006. Specific requirements have been removed from the permit.
SPECIFIC REQUIREMENTS **1, 51, 134, 150**	For Specific Requirements 1, 51, 134, 150, NISCO requests that Title V permit specify that LAC 33:III.1101 is superseded by 40 CFR 60 Subparts A and Db This is necessary to address Opacity concerns during Start-up. 40 CFR 60 Db provides an exemption during Startup, but LAC 33:III. 1101. B does not.	No changes to Specific Requirements 1, 51. LAC 33:III.1101.B applies to C1 and C2 boiler stacks under normal routines. Removed Specific Requirements 134 and 150 from the permit. NISCO is exempt from LAC 33:III.1101.B as defined in the regulation only during start-up. (...Building of a new fire...)
SPECIFIC REQUIREMENTS **17**	For Special Condition 17, revise to add the Underlined words: Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total amounts of each individual material injected into the J-valve of this unit <u>for agglomeration control</u> and the total amount of subbituminous coal fired in this unit <u>for agglomeration control</u> each month, as well as the total amounts of each individual material injected into the J-valve of this unit <u>for agglomeration control</u> and the total amount of subbituminous coal fired in this unit <u>for agglomeration control</u> for the last twelve months.	Change made; Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total amounts of each individual material injected into the J-valve of this unit for agglomeration control and the total amount of subbituminous coal fired in this unit for agglomeration control each month, as well as the total amounts of each individual material injected into the J-valve of this unit for agglomeration control and the total amount of subbituminous coal fired in this unit for agglomeration control for the last twelve months. **Subbituminous coal fired in this unit shall only be used for agglomeration control.**

SPECIFIC REQUIREMENTS **18**	For Special Condition 18, revise to add the Underlined words: Report the total amounts of each individual material injected into the J-valve of this unit **for agglomeration control** and the total amount of subbituminous coal fired in this unit **for agglomeration control** for the preceding....	Change made; . Report the total amounts of each individual material injected into the J-valve of this unit for agglomeration control and the total amount of subbituminous coal fired in this unit for agglomeration control for the preceding calendar year to the Office of Environmental Compliance, Surveillance Division. **Subbituminous coal fired in this unit shall only be used for agglomeration control.**
SPECIFIC REQUIREMENTS **1, 51, 134 and 130 and 20 and 70**	For Conditions 1/51/134/130 (opacity per LAC regs) & #20/70 (opacity per Part 60 Db regs) Request clarification that NISCO has exceptions provided in Db regs per Spec Req 20 & 70. Excess opacity emissions associated with S/U, S/D, or malfunction will not be reported in the Part 60 reports. Instead, these and all other opacity excess emissions will be reported via the Title V Deviation Reports to comply with LAC regs per Spec Req 1/51/134/130.	No changes to Specific Requirements 1, 51. LAC 33:III.1101.B applies to C1 and C2 boiler stacks under normal routines. Removed Specific Requirements 134 and 150 from the permit. Clarification: Excess opacity emissions associated with S/U, S/D, or malfunction will be reported via the Title V Deviation Reports to comply with LAC regs per Spec Req 1, 51, 134, and 150.
	In section 1.6 of the Permit Application (Dated February 2007) NISCO requested a Permit Shield under LAC 333:III.507.I be incorporation for all federally applicable requirements identified in Section 2 (of the permit application) insofar as these requirements pertain to NSPS, PSD, NSR and HAPs. The information provided did not appear to address the Permit Shield request.	Permit shield not necessary. Comments address NISCO's concern for Opacity 20% or less for Startup operations of the CFB Boilers. Removed Specific Requirements for 1101.B (134 and 150) regarding startup operations of the CFB Boilers from the permit.