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**To:** Camilla Widenhofer <CWidenho@tceq.state.tx.us>  
**Date:** 8/2/2010 1:17 PM  
**Subject:** Need clarifications on TCEQ's Response on Southwestern Harrington Station Permit No. O15  
**CC:** <Robinson.Jeffrey@epamail.epa.gov>, <shagle@tceq.state.tx.us>

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Hi Camilla,

We need a few clarifications to the Executive Director's letter of July 29, 2010, to EPA on Southwestern's Title V permit. Below are our questions.

Questions on Response No. 1

1. HS-1: TCEQ's response states best available control technology (BACT) was not triggered for nitrous oxide (NOx) for HS-1. The Table indicates that the permit contains NOx emission limitations based on BACT (2504 lbs/hr and 8744 tpy). Is this in error? Please clarify.
2. HS-1: TCEQ's response states BACT was triggered for sulfur dioxide (SO<sub>2</sub>). The Table gives a SO<sub>2</sub> emission limitation technology control rate as 1.2 lb/MMBtu based on New Source Performance Standards (NSPS). The Table also gives short and long term emission limitations (1634 lb/hr and 5247 tpy) based on BACT. What is the SO<sub>2</sub> BACT technology control rate (in lb/MMBtu)? Is the NSPS standard the governing technology control rate requirement? Is the NSPS SO<sub>2</sub> limit given more stringent than the BACT limit that was established for the unit?
3. HS-1: TCEQ's response states BACT was triggered for carbon monoxide (CO). The Table does not give a CO emission limitation technology control rate for BACT (in lb/MMBtu) although it does give short and long term emission limitations (1634 lb/hr and 5247 tpy). What is the BACT technology control rate (in lb/MMBtu)?
4. HS-2-1: TCEQ's response states BACT was triggered for CO. The Table does not give a CO emission limitation technology control rate for BACT (in lb/MMBtu) although it does give short and long term emission limitations (1915 lb/hr and 5033 tpy). What is the BACT technology control rate (in lb/MMBtu)?
5. HS-3-1: TCEQ's response states BACT was triggered for SO<sub>2</sub>. The Table gives a SO<sub>2</sub> emission limitation technology control rate as 1.2 lb/MMBtu based on NSPS. The Table also gives short and long term emission limitations (4151 lb/hr and 18181 tpy) based on BACT. What is the BACT technology control rate for SO<sub>2</sub> (in lb/MMBtu)? Is the NSPS the governing technology control rate requirement? Is the NSPS SO<sub>2</sub> limit given more stringent than the BACT limit that was established for the unit?
6. HS-1, HS-2-1, and HS-3-1: TCEQ states that NOx was never triggered for these units. The Preliminary Determination Summaries for both PSD permits prepared in 2008 (PSDTX017M1 for HS-2-1 and HS-3-1) and 2009 (PSDTX631M1 for HS-1) referenced NOx emission limitation technology control rates of 0.225 lb/MMBtu and 0.25 lb/MMBtu, respectively. The Table indicates these values are application representations. What does TCEQ consider the governing NOx emission limitation technology control rates? The application representations (0.225 lb/MMBtu for HS-2-1 & HS-3-1 and 0.25 lb/MMBtu for HS-1); or the NSPS based limits found in the Table (ranging from 0.2 – 0.7 lb/MMBtu (3-hr. rolling avg.), dependent on the fuel, and 0.4 lb/MMBtu (annual avg.)? Are the application representations the controlling or prevailing limits?

Question on Response No. 4

7. Were the emission limitations listed in the Table for HS-1, HS-2-1, and HS-3-1 modified to reflect the increases/decreases allowed under the Permit By Rule 30 TAC § 106.261 (NOx increase of 0.124 tpy, CO increase of 1.761 tpy, and VOC increase 0.028 tpy) and (SO<sub>2</sub> decrease of 3.63 tpy)? If not, why not?

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