

APPENDIX O

LIMESTONE 1 AND 2 DISCOUNT FACTOR ANALYSIS

Rusk-Panola Attainment Demonstration State
Implementation Plan Revision for the 2010 Sulfur
Dioxide National Ambient Air Quality Standard

Project Number 2020-057-SIP-NR
SFR-122/2020-057-SIP-NR

LIMESTONE 1 AND 2 DISCOUNT FACTOR ANALYSIS

On November 5, 2021, Luminant Generation Company LLC (Luminant) submitted information, in the form of a Microsoft Excel document, to the Texas Commission on Environmental Quality (TCEQ) concerning the use of NRG Limestone as a surrogate source for deriving a discount factor. The document contains a unit-by-unit analysis and a sitewide analysis for deriving a discount factor as well as emissions and parametric data for Limestone Unit 1 and Unit 2. The TCEQ used this data to develop a discount factor of 0.91 for the final source cap SO₂ emissions limit of 7,469 pounds per hour (lb/hr) for the combined three electric generating facility (EGF) boiler units and discount factors of 0.97 for the final individual SO₂ emission limits of 0.32 pounds per million British thermal units (lb/MMBtu) for each EGF boiler unit. The TCEQ applied the discount factors to the respective one-hour SO₂ emission limits to arrive at final limits on a longer averaging time basis. A copy of the document provided by Luminant can be found at https://www.tceq.texas.gov/downloads/air-quality/sip/so2/rusk-panola/20057sip_appendix0_excel.xlsx.