

US EPA ARCHIVE DOCUMENT

Lower Colorado River Authority (LCRA), Thomas C. Ferguson Power Plant
Prevention of Significant Deterioration Permit for Greenhouse Gas Emissions
PSD-TX-1244-GHG

Summary of Revisions in Final Permit

U.S. Environmental Protection Agency
November 9, 2011

Summary of the Formal Public Participation Process

The U.S. Environmental Protection Agency, Region 6 (EPA) proposed to issue a Prevention of Significant Deterioration (PSD) permit to the Lower Colorado River Authority (LCRA), Thomas C. Ferguson Power Plant on September 28, 2011. The public comment period on the draft permit began September 28, 2011 and closed on October 28, 2011. EPA announced the public comment period through a public notice published in *The Llano News* on September 28, 2011 and on Region 6's website. EPA also notified agencies and municipalities on September 27, 2011 in accordance with 40 CFR Part 124.

The Administrative Record for the draft permit was made available at EPA Region 6's office. EPA also made the draft permit, Statement of Basis and other supporting documentation available on Region 6's website and the County of Llano Main Library in Llano, TX.

EPA's public notice for the draft permit also provided the public with notice of the public hearing. The public notice stated that "*if no request for a public hearing is received by October 26, 2011, or EPA determines that there is not significant interest, the hearing will be cancelled. If the hearing is cancelled, EPA will post an announcement of the cancellation by October 28, 2011 on EPA's website at: <http://yosemite.epa.gov/r6/Apermit.nsf/AirP> or you may call EPA at the contact number above to determine if the public hearing has been cancelled.*" During the public comment period, EPA did not receive any public inquiries or comments concerning the draft permit and no requests for a public hearing.

Revisions in Final Permit

The following is a list of administrative and clarifying changes for the *Lower Colorado River Authority (LCRA), Thomas C. Ferguson Power Plant (PSD-TX-1244-GHG) Prevention of Significant Deterioration Permit, Final Permit Conditions*.

1. Cover Sheet

The cover sheet titled "Prevention of Significant Deterioration Permit for Greenhouse Gas Emissions Issued Pursuant to the Requirements at 40 CFR §52.21" has been modified to state the following:

In accordance with 40 CFR §124.15(b)(3), this PSD Permit becomes effective ~~30 days after the service of notice of this final decision unless review is requested on the permit pursuant to 40 CFR §124.19~~ immediately upon issuance of this final decision.

This administrative change is made as a result of not receiving any comments related to this action.

2. Combustion Turbine Generator (CTG) BACT Emission Limits

Under Special Condition II.B.1.b, the permittee is limited to a combustion turbine average net heat rate of 7720 Btu/kwh (HHV) on a 365-day rolling average. As noted in condition II.B.1.a, permit application and emission calculations, the average net heat rate includes the two Combustion Turbine Units (U1-STK and U2-STK) and steam turbine

generator. This special condition is changed to clarify the emission units associated with the average net heat rate. We have revised the Special Condition as follows:

b. Permittee shall not exceed ~~a Combustion Turbine~~ an average net heat rate of 7720 Btu/kwh (HHV) on a 365-day rolling average from the Combustion Turbine Units (U1-STK and U2-STK) and steam turbine generator. To determine this limit, Permittee shall calculate the average net heat rate on a hourly basis consistent with equation F-20 and procedure provided in 40 CFR Part 75, Appendix F, § 5.5.2 and the measured net hourly energy output (kwh). The calculated hourly heat rate is averaged daily.

3. Page 9, Special Condition II.B.3.b This special condition is changed to clarify the requirements of the condition. We have revised the Special Condition as follows:

b. The calculated CO₂ emissions from Special Condition II.B.3.a. shall be compared to the measured CO₂ emissions from the CO₂ emission monitor, required in Special Condition II.B.2.a, and the calculated hourly stack gas volumetric flow rate, required in Special Condition II.B.1.c., on a daily basis. If the mean difference between the calculated and measured CO₂ emission monitor result is greater than 10% of measured CO₂ concentration, permittee shall review the emission units and monitoring instrumentation operational performance. From this review, any corrective measures taken are to be identified, and recorded, and the recorded information shall include ~~including~~ the reason for the CO₂ emissions difference and corrective measures completed within 48 hours of the corrective measures being taken. If the permittee, chooses to install and operate a CO₂ CEMS equipped with a volumetric stack gas monitoring system, then the CO₂ emission calculation from Special Condition II.B.3a and mean difference comparison is no longer a requirement and the permittee shall rely on the data from the CO₂ CEMS for compliance purposes.

4. Page 14, Section II.D.2., Fugitive Emission Sources Work Practice and Operational Requirements This section is incorrectly numbered and the draft Special Condition d is renumbered to c.
5. Page 17, Section V. Performance Testing Requirements
This section is incorrectly listed two Special Condition G's are included. The second Special Condition G is changed to Special Condition H.