

US EPA ARCHIVE DOCUMENT

## Nuria de las Casas

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**From:** Nuria de las Casas  
**Sent:** Monday, July 14, 2014 2:28 PM  
**To:** Magee, Melanie; Robinson, Jeffrey  
**Cc:** Marc Sturdivant (Marc.Sturdivant@tceq.texas.gov); Gary Clark; Matthew Lindsey; Jeff Martin; Mona Johnson (mjohnson@camsesparc.com)  
**Subject:** RE: Opportunity to Review Draft Permit for Victoria Power  
**Attachments:** 2014-07-14 Statement of Basis Victoria 060514.docx; 2014-07-14 Unit 10 (VIC10) GHG Emission Rate Calcs.pdf; 2014-07-14 Victoria Draft Permit 060514.docx; 2014-07-14 Victoria Post Submittal Perform Std.pdf

**Categories:** Victoria

Melanie,

Thank you for the additional time to review and provide comments on the draft permit and statement of basis. Following our discussions last week, we have reviewed Victoria's proposed output-based emission rate limit for full load operation and incorporated a BACT emission rate limit applicable during MSS events. In addition, during our call with Ms. Wilson, she requested we provided detailed calculations of the maintenance and shutdown methane purging that had been added to the total Unit 10 GHG calculations.

In order to provide clarification on both aspects I'm attaching to this email the following documentation:

1. 2014-07-14 Unit 10 (VIC10) GHG Emission Rate Calcs.pdf → detailed emission rate calculation for VIC10 including detailed MSS emission rate calculations.
2. 2014-07-14 Victoria Post Submittal Perform Std.pdf → description of the proposed performance standards calculation and compliance methodology.
3. 2014-07-14 Statement of Basis Victoria 060514.doc → reviewed and marked-up SOB.
4. 2014-07-14 Victoria Draft Permit 060514.doc → reviewed and marked-up Draft Permit.

Although we have provided the above requested updates to the draft permit and SOB, we would appreciate an explanation as to how the recent Supreme Court ruling is going to impact this permit and in particular the proposed limits to be imposed for CO<sub>2</sub>-related emission rates. Please let me know what will be the best timing for you to schedule a call and discuss the impacts of this ruling on our application and the eventual permit issuance.

Shall you need any additional clarification, don't hesitate to contact me at 617-599-0303 or at [ndelascasas@camsesparc.com](mailto:ndelascasas@camsesparc.com)

Thank you

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**From:** Mona Johnson  
**Sent:** Friday, June 20, 2014 4:59 PM  
**To:** Robinson, Jeffrey  
**Cc:** Magee, Melanie; Marc Sturdivant ([Marc.Sturdivant@tceq.texas.gov](mailto:Marc.Sturdivant@tceq.texas.gov)); Gary Clark; Matthew Lindsey  
**Subject:** RE: Opportunity to Review Draft Permit for Victoria Power

Jeff and Melanie-

Thank you for the additional time to review and provide comments on the draft permit and statement of basis. I am attaching the documents with our comments in track changes. Please let me know if you would like to set up a call to discuss further.

Thank you,  
Mona

**Mona Caesar Johnson, P.E.**

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**From:** Robinson, Jeffrey [<mailto:Robinson.Jeffrey@epa.gov>]  
**Sent:** Friday, June 06, 2014 10:00 AM  
**To:** Mona Johnson  
**Cc:** Magee, Melanie  
**Subject:** Opportunity to Review Draft Permit for Victoria Power

Mona:

Attached is draft permit and the Statement of Basis for Victoria Power. We are still doing some tweaks to both documents, but these are pretty close to what we will go to public notice with. I've done some tweaks to both documents this morning as Melanie is out of the office, so hopefully I didn't mess anything up that she and our legal counsel may be evaluating for further edits based on comments we've received from our EPA HQ offices late this week on the statement of basis. Please provide any comments you have to Melanie early next week (by noon Tuesday if possible), or feel free to call her to discuss any questions you may have.

In addition, we still need to add the ESA and NHPA discussions to the Statement of Basis. It is my understanding we are still waiting on revisions to the cultural resources report for our NHPA determination and the final biological assessment to support our determination under the ESA. We need both final documents to be able to proceed to public notice.

Jeff Robinson, Section Chief  
Air Permits Section  
EPA Region 6  
214-665-6435

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