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February 16, 1990

Mr. William C. Campbell, III
Cogentrix, Inc.
9405 Arrowpoint Boulevard
Charlotte, NC 28217

Dear Mr. Campbell:

We know that you are anxious to expedite the processing of your PSD permit for a power-generation facility. We, too, are committed to that goal, but we must work together to achieve it.

In order to enhance the process, we have developed target emission guidelines which we believe are both technically and economically feasible for coal-fired facilities. Each applicant must do a complete PSD review and thorough study and documentation of "top-down" Best Available Control Technology. This should include starting with the most stringent control option. The technical and economic feasibility of that option should be carefully reviewed and documented. If you believe that such a control option is inappropriate for your facility, then select the next "best" control option and repeat the technical and economic feasibility analysis. This process should continue until a control option cannot be discarded on technical or economic feasibility issues. BACT is a case-by-case determination and it remains the responsibility of the applicant to demonstrate the appropriate option for his facility.

A copy of a typical outline for a PSD submittal is enclosed for your information and use.

GUIDELINE LIMITS FOR COAL-FIRED UNITS

Total Suspended Particulates (TSP)	0.020 lbs/million btu
PM-10	0.018 lbs/million btu
SO ₂	0.16 lbs/million btu
Minimum SO ₂ Scrubber efficiency	92%
NO _x	0.3 lbs/million btu
CO	0.20 lbs/million btu
VOC	0.03 lbs/million btu

If you have any questions or comments on any of the above, please contact John M. Daniel, Jr. (804) 786-3248 or Pam Faggert (804) 786-5481.

Sincerely,

Wallace N. Davis
Executive Director

cc: Asst. Executive Director - Technical Operations
Director, Div. of Technical Evaluation
Regional Directors
Director, Div. of Computer Services

TYPICAL OUTLINE
FOR
PSD PERMIT APPLICATION

TABLE OF CONTENTS

- 1.0 INTRODUCTION
 - 1.1 Purpose Project
 - 1.2 Need for Project and Site Selection Process
 - 1.3 Project Description
 - 1.4 Applicable Regulations
 - 1.5 BACT Analysis
 - 1.6 Air Quality Impacts
 - 1.7 Additional Impacts
- 2.0 BACKGROUND
 - 2.1 Need for Project
 - 2.2 Site Selection Process
- 3.0 PROJECT DESCRIPTION
 - 3.1 Description of Facilities
 - 3.1.1 Combustion/Generation Systems
 - 3.1.2 Exhaust Systems & Pollution Control Equipment
 - 3.1.3 Materials Handling and Storage Systems
 - 3.1.3.1 Coal
 - 3.1.3.2 FGD System Reagents
 - 3.1.3.3 Ash and FGD Waste
 - 3.1.3.4 Fuel Tanks
 - 3.1.4 Cooling Water Systems
 - 3.1.5 Transportation Systems
 - 3.1.6 Miscellaneous Sources of Air Pollution
 - 3.1.6.1 Auxiliary Boiler
 - 3.1.6.2 Emergency Generators
 - 3.1.6.3 Roads
 - 3.1.6.4 Other Sources
 - 3.1.7 Construction Facilities
 - 3.2 Fuels and Raw Materials
 - 3.2.1 Coal
 - 3.2.1.1 Sources
 - 3.2.1.2 Specifications
 - 3.2.2 Oil
 - 3.2.2.1 Sources
 - 3.2.2.2 Specifications
 - 3.2.3 FGD System Reagents
 - 3.2.3.1 Sources
 - 3.2.3.2 Specifications
 - 3.3 Site Description
 - 3.3.1 Location
 - 3.3.2 Class I and Nonattainment Areas
 - 3.3.3 Topography
 - 3.3.4 Climatology
 - 3.3.5 Land Use
 - 3.3.6 Demography
 - 3.4 Project Schedule
 - 3.5 Plant Operation
- 4.0 APPLICABLE REGULATIONS
 - 4.1 PSD Regulations
 - 4.1.1 Area Classifications
 - 4.1.2 Source Definition
 - 4.1.3 Potential Emissions
 - 4.1.4 PSD Review Requirements
 - 4.2 Nonattainment Regulations

- 4.3 New Source Permit Requirements
- 4.4 New Source Performance Standards
 - 4.4.1 Emission Limitations
 - 4.4.2 Continuous Emission Monitoring Requirements
- 4.5 Standards for Noncriteria Pollutants
- 4.6 Other Requirements
- 4.7 Proposed Legislation
 - 4.7.1 State and Local Legislation
 - 4.7.2 Federal Legislation
 - 4.7.2.1 Acid Rain
 - 4.7.2.2 Hazardous Air Pollutants
 - 4.7.2.3 Dispersion Techniques
 - 4.7.2.4 Ambient Air Quality Standards
 - 4.7.2.5 New Source Performance Standards
 - 4.7.2.6 Visibility

5.0 BEST AVAILABLE CONTROL TECHNOLOGY ANALYSES

- 5.1 Introduction
 - 5.1.1 Purpose
 - 5.1.2 Guidance for BACT Analysis
 - 5.1.3 Selection Procedure
 - 5.1.4 Parameters and Assumptions for Analysis
 - 5.1.4.1 Fuels
 - 5.1.4.2 Operations Data and Assumptions
 - 5.1.4.3 Economic Analysis Assumptions
 - 5.1.5 Status of Engineering
- 5.2 Sulfur Dioxide
 - 5.2.1 Control Technology Alternatives
 - 5.2.2 Fuel Selection
 - 5.2.3 Technical Considerations
 - 5.2.4 Economic Impacts
 - 5.2.4.1 Capital Costs
 - 5.2.4.2 Operation and Maintenance Costs
 - 5.2.4.3 Auxiliary Power Costs
 - 5.2.4.4 Reagent Costs
 - 5.2.4.5 Waste Disposal Costs
 - 5.2.4.6 Economics Summary
 - 5.2.5 Energy Impacts
 - 5.2.6 Environmental Impacts
 - 5.2.7 BACT Determination
- 5.3 Particulate Matter (Stack Emissions)
 - 5.3.1 Control Technology Alternatives
 - 5.3.2 Economic Impacts
 - 5.3.3 Energy Impacts
 - 5.3.4 Environmental Impacts
 - 5.3.5 BACT Determination
- 5.4 Particulate Matter (Non-Stack Emissions)
 - 5.4.1 Control Technology Alternatives
 - 5.4.2 Economic Impacts
 - 5.4.3 Energy Impacts
 - 5.4.4 Environmental Impacts
 - 5.4.5 BACT Determination
- 5.5 FGD System Reagent Handling and Storage
 - 5.5.1 Control Technology Alternatives
 - 5.5.2 Economic Impacts
 - 5.5.3 Energy Impacts
 - 5.5.4 Environmental Impacts
 - 5.5.5 BACT Determination
- 5.6 Ash & FGD System Waste Handling and Storage
 - 5.6.1 Control Technology Alternatives
 - 5.6.2 Economic Impacts
 - 5.6.3 Energy Impacts
 - 5.6.4 Environmental Impacts
 - 5.6.5 BACT Determination
- 5.7 Nitrogen Oxides
 - 5.7.1 Control Technology Alternatives
 - 5.7.2 Economic Impacts
 - 5.7.3 Energy Impacts
 - 5.7.4 Environmental Impacts
 - 5.7.5 BACT Determination
- 5.8 Carbon Monoxide

- 5.9 Ozone (Volatile Organic Compounds)
 - 5.9.1 Control Technology Alternatives
 - 5.9.2 Economic Impacts
 - 5.9.3 Energy Impacts
 - 5.9.4 Environmental Impacts
 - 5.9.5 BACT Determination
- 5.10 Sulfuric Acid Mist
- 5.11 Trace Elements
 - 5.11.1 Lead
 - 5.11.2 Beryllium
 - 5.11.3 Fluorides
 - 5.11.4 Mercury
- 5.12 Other Noncriteria Pollutants
- 6.0 AIR QUALITY ANALYSES
 - 6.1 Air Quality Analysis Objectives
 - 6.2 Site Characteristics
 - 6.2.1 Station Design Data
 - 6.2.1.1 Primary/Fugitive Emissions
 - 6.2.1.2 Non-Criteria Pollutant Emissions
 - 6.2.1.3 GEP Stack Height/Downwash Analysis
 - 6.2.2 Other Source Data
 - 6.2.2.1 Impact Area Determination
 - 6.2.2.2 Source Selection
 - 6.2.2.3 Downwash Analysis
 - 6.2.2.4 Emissions Inventory
 - 6.2.3 Urban/Rural Classification
 - 6.2.4 Background Concentrations
 - 6.2.4.1 On-Site Air Quality Monitoring
 - 6.2.4.2 Regional Air Quality Monitoring
 - 6.2.5 Regional Air Quality Attainment Status
 - 6.3 Model/Options Selection
 - 6.3.1 Model Selection
 - 6.3.2 Data Base Requirements
 - 6.3.3 Receptor Grid Selection
 - 6.3.3.1 Intermediate and Complex Terrain
 - 6.3.3.2 Coarse Polar Grid
 - 6.3.3.3 Fine Polar Grid
 - 6.3.3.4 Discrete Receptors
 - 6.3.3.5 Receptor Elevations
 - 6.4 Meteorological Data Base
 - 6.4.1 On-Site Meteorological Data Collection
 - 6.4.2 On-Site Data Enhancements
 - 6.4.3 Off-Site Data Requirements (Mixing Heights)
 - 6.4.4 Combined Processed Data Base
 - 6.5 Impact Analysis
 - 6.5.1 Worst Case Load
 - 6.5.2 Model Predictions
 - 6.5.2.1 Primary Pollutants Impact
 - 6.5.2.2 Non-Criteria Pollutants Impact
 - 6.5.3 PSD Increment Consumption
 - 6.5.4 NAAQS Compliance Demonstration
 - 6.5.5 Fugitive Dust Impacts
- 7.0 ADDITIONAL IMPACTS ANALYSIS
 - 7.1 Growth Analysis
 - 7.2 Impact on Soils and Vegetation
 - 7.2.1 Sulfur Dioxide
 - 7.2.2 Particulates
 - 7.2.3 Nitrogen Dioxides
 - 7.2.4 Carbon Monoxide
 - 7.2.5 Lead
 - 7.2.6 Beryllium
 - 7.2.7 Mercury
 - 7.2.8 Fluorides
 - 7.2.9 Sulfuric Acid Mist
 - 7.3 Visibility Impact
 - 7.3.1 Purpose
 - 7.3.2 Methodology
 - 7.3.3 Screening Analysis Procedure
 - 7.3.4 Screening Analysis Results

8.0 REFERENCES
APPENDICES

- A. State Registration/Application Forms
- B.1 Potential Emission Calculations
- B.2.1 Modeling - Stack Emission Calculations
- B.2.2 Modeling - Non-Stack Emission Calculations
- B.2.3 Modeling - Trace Element Emission Calculations
- C. Modeling Plan
- D. Emissions Inventory and Screening Procedure
- E. Emissions Inventory Data Sheets
- F. Monitoring Plan
- G. Ambient Air Quality Monitoring Data
- H. On-Site Meteorological Monitoring Data
- I. Monitoring Quality Assurance Program
- J. Meteorological Data Base for Modeling
- K. Mixing Height Computation Methodology
- L.1 - L.15 Computer Modeling Diskettes