

US EPA ARCHIVE DOCUMENT

From: [Aisling, Kathleen](#)
To: [Knowles, Daren](#)
Subject: FHR GHG Permit Application Update, March 2014, Two Questions
Date: Wednesday, March 12, 2014 9:34:59 AM

Daren, as we discussed, I have two questions on your submittal yesterday:

- 1) On page 73 of the Revised March 2014 permit application, there is a value of 178,700 tons per year of CO₂ emitted for the 150# boiler. On page 72 of the same document, there is a cost estimate table stating that the new 150# Steam Boiler would have an amine capture skid, which implies that the carbon would be captured from this unit and not emitted. Please clarify whether or not the CO₂ emission value in the table takes into account the capture of the CO₂.

- 2) On page 79 of the Revised March 2014 permit application, the table states that enhanced LDAR includes installation of components with "low leak" and/or "leakless" technologies in certain applications, while Step 3, #1, states that enhanced LDAR includes installation of "low leak" and/or "leakless" technologies (designed to be less than 100 ppmv per Method 21). Please clarify the proposed BACT in regard to which components, under what circumstances, will be installed with low leak or leakless technologies, and the backing document for this enhanced LDAR proposal (TCEQ permit, CD, internal company policy, or other.)

Please either respond by e-mail or letter, or update the corresponding pages in the permit application.

Let me know if you have any questions.

Thank you.

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