



Kathleen
Stewart/R9/USEPA/US
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To rolivares@aqmd.gov
cc jye@aqmd.gov
bcc
Subject EPA comments on CPV Sentinel

Dear Roy and John,

Thank you for the opportunity to review the proposed permit for CPV Sentinel. We have conducted a quick review of the proposed permit and found similar issues as for the proposed permit for SGGs/Etiwanda, which we commented on last week (note that CPV Sentinel was received well before we commented on SGGs). Please see and address comments 3, 4, and 5 below, with the following changes:

3. See page 53 of the PDOC

4. See page 52 of the PDOC

- a. HAP calculations are in Appendix H, not Appendix E
- b. Not an issue for this PDOC
- c. Not an issue for this PDOC
- d. Please address for CPV Sentinel

5. Refer to Conditions A99.1-A99.4; also note that, unlike SGGs, the permit conditions for Sentinel already appropriately reference BACT.

Please let me know if you have any questions or concerns. EPA's 45-day review period ends June 16.

Sincerely,

- Katie

Katie Stewart
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Chris - Thank you for the opportunity to review the proposed permit for the construction and operation of the new San Gabriel Generating Station, a combined cycle power plant at the existing site of the Reliant Energy, Etiwanda plant in Rancho Cucamonga (Facility ID 115315). Below you will find our comments on the proposed permit. I would like to note at the outset that we appreciate the effort to include citations to the PSD permitting regulations throughout the permit for PSD conditions, and also for immediately notifying us of comments that were received. Please call me should you have any questions or wish to discuss these comments in further detail.

Sincerely,

- Katie

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COMMENTS

1. Page 109 of the PDOC, Condition A99.1:

Please note the typo in this condition, which indicates that the BACT limit for NOx for the turbines during normal operation is 2ppm. Condition A99.1 in the permit contains the correct concentration limit. However, at least one other condition in the permit continues to reference the 2.0 ppm limit (for example, Condition A433.1). Please check and correct permit conditions referencing the NOx BACT limit.

2. Page 17 of the PDOC, Table 3.10:

Please correct the typo in this table, which indicates an assumption that there will be 36, rather than 31, shutdowns per 30 day period.

3. Page 42 of the PDOC, Compliance Assurance Monitoring :

A CAM plan is required for VOC emissions from the turbine; VOC emissions are controlled by the use of an oxidation catalyst. The CAM plan described only requires monitoring of the exhaust gas to ensure that the oxidation catalyst is operating properly. We believe that monitoring temperature alone is insufficient for this purpose. Temperature is only one indicator of proper operation, and not a complete one. Other variables that must be considered include outlet temperature, continuous monitoring of CO, VOC, O2, and/or CO2 concentrations, fan current, pressure differential, and catalyst activity checks. Please review EPA's CAM guidance, Appendix B, Section 7, available here: <http://www.epa.gov/ttn/emc/cam/draftcamappb.pdf>. You may also like to review the attached comment letter on CAM conditions for a thermal oxidizer, which has similar indicators of proper operation as a catalytic oxidizer. Please revise the PDOC and the permit to include additional indicators of proper operation as deemed necessary. Please note that we were unable to find any conditions requiring temperature monitoring of the CO catalyst, or any conditions relating to the proper operation and maintenance of the CO catalyst. CAM is an applicable requirement and the parameters chosen to implement CAM must be included in the title V permit with a citation to CAM as the underlying authority.



renewal comments.pdf

4. Page 42 of the PDOC, NESHAP Discussion :

In discussing the area source status of the facility, the PDOC states: "Neither the boilers or the turbines emit any single HAP at a rate of 10 tpy or more, and the total combined potential HAP emissions from all sources (2 turbines, aux boiler, 2 utility boilers) at the site are about 13 tpy, therefore, reliant is not classified as a major source of HAPs, and subject is not to this subpart. Calculations can be referenced in Appendix K."

There are several concerns relating to this write-up.

A. The calculations of HAP emissions are in Appendix L, not Appendix K.

B. This write-up misrepresents the definition of a major source of HAP. A major source of HAP is any stationary source that emits or has the potential to emit 25 tpy of a combination of HAP or 10 tpy of any single HAP, in aggregate. That is, for any single HAP, the potential to emit must not exceed 10 tpy for all units at the source, combined. The description in Appendix L gets this correct, but the way it is written in the text of the PDOC is incorrect. Please revise this wording.

C. The calculations in Appendix L appear to only account for HAP emissions from the aux boiler and existing boilers 3 and 4. These calculations do not address potential HAP emissions from the turbines, or the 3 emergency fire pump engines, the gasoline dispensing unit, or the cooling towers. Please revise the PDOC to include the PTE from these units in determining major source applicability.

D. Please revise the PDOC to address the fact that EPA has also promulgated several NESHAPs for area sources and whether any of the equipment is subject to the area source standards. Please note that EPA has recently promulgated an area source standard for gasoline dispensing units. Please be aware that EPA has also developed an area source rule for new internal combustion engines at area sources, and will be promulgating a standard for existing internal combustion engines sometime in the future. EPA is also on a court-ordered schedule to promulgate area source standards for industrial, commercial, and institutional boilers by June 15, 2009. You can see EPA's website for area source rules for more information: <http://www.epa.gov/ttn/atw/area/arearules.html>

5. BACT for Startup/Shutdown Periods

Condition A433.1 contains time and emission limits for commissioning, startup, and shutdown periods in lieu of complying with BACT for normal operating periods. This condition cites to PSD analysis and RECLAIM Rule 2005 as the underlying basis for the condition. The PDOC does not discuss commissioning, startup, and shutdown periods in relation to the BACT determinations (pages 26-28). Previous decisions by the Environmental Appeals Board have established that Best Available Control Technology requirements apply at all times during the operation of a facility, including periods of start-up and shutdown. The District must ensure that the proposed start-up and shutdown requirements in the permit are consistent with established BACT levels for startup and shutdown operations. EPA conducts its own such analysis for permits EPA issues directly and we have commented to SCAQMD on this issue multiple times in the past. See for instance EPA comment letters on Wellhead Power Margarita (December 20, 2007) and UC Irvine (December 23, 2005). Please include an analysis in the PDOC as to how the startup/shutdown conditions meet BACT and please also include a citation to BACT for permit condition A433.1.

6. Endangered Species Act Requirements

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. ' 1536, and its implementing regulations at 50 C.F.R. Part 402, EPA is required to ensure that any action authorized, funded, or carried out by EPA is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of such species' designated critical habitat. EPA has determined that this delegated PSD permitting action triggers ESA Section 7 consultation requirements. EPA is therefore required to consult with the U.S Fish and Wildlife Service (FWS) if an endangered species or threatened species may be present in the area affected by the permit project and EPA's action (i.e., permit issuance) may affect such species. EPA is also required to confer with the Service on any action which is likely to jeopardize the continued existence of any species proposed for listing (as endangered or threatened) or result in the destruction or adverse modification of habitat proposed to be designated as critical for such species.

As indicated on page 39 of the PDOC, the final PSD permit cannot be issued until Section 7 consultation is complete and the Region has determined that issuance of the PSD permit is consistent with Section 7 requirements. Please note a couple of details. First, EPA is currently engaged in /formal consultation with the US FWS (the PDOC indicates that formal consultation is currently taking place). Informal consultation is ongoing until a second year of surveys are conducted for the endangered Delhi Sands

Flower-loving fly (DSFLF) as required by FWS guidelines. If the survey shows that no DSFLF are present in the action area, EPA will request concurrence from FWS of a "not likely to adversely affect" determination in order to conclude informal consultation. On the other hand, if the survey shows that the DSFLF is present, EPA will seek to initiate formal consultation with FWS. Formal consultation typically results in a final Biological Opinion being issued. The US FWS would issue the final Biological Opinion, not the EPA. EPA will keep SCAQMD informed of the status of our consultations with US FWS and will notify SCAQMD when the Endangered Species Act process is complete.

On page 45 of the PDOC, under "Recommendations," please add the following clarification:

"Based on the forgoing analysis, it is recommended that a Permit to Construct be issued following completion of the 30 day public and 45 day EPA review and comment period and securing all necessary emission offsets *and following completion of consultation pursuant to Section 7 of the Endangered Species Act.*"