

EPA Comments on Proposed Title V Unitary Permit for Coolidge Generating Station

Permit

1. Although the Technical Support Document addresses PM_{2.5} emissions, the permit only references PM₁₀, for example in Section 1 and Section 4.C. Where applicable, please include PM_{2.5} when referencing criteria pollutants.
2. Condition 4.C.1: The permit proposes a 245 tons per year (tpy) emissions cap for each criteria pollutant – CO, NO_x, VOC, PM₁₀, PM_{2.5} (assumed), and SO₂ – which is below the 250 tpy major source threshold, thus the project does not trigger Title I (PSD) review (see also TSD, Section 7.A). The permittee’s application and Pinal County’s emission calculations present PTE that is lower than the emissions cap of 245 tpy, especially for VOC, PM₁₀, PM_{2.5}, and SO₂ emissions. Pinal County should determine if it is necessary to apply the 245 tpy cap for those pollutants.
3. Condition 5.E: The condition is taken from an NSPS requirement and there is no citation providing origin or authority other than “NSPS Standards...” Please include the citation for the federal regulation, in this case it is 40 C.F.R. 60 Subpart III, Table 4.
4. Condition 6.C.1: EPA believes this permit condition should be more pollutant-specific since there is an emissions cap of 245 tpy per criteria pollutant and this condition could be interpreted in different ways, for example 245 tpy in the aggregate vs. 245 tpy of individual pollutants.
5. Condition 6.C.2: There is a typo, “start-ap” should read “start-up”

Technical Support Document

6. Section 6, Table 1, Table 2, Table 3, and footnote “4”: The abbreviation for particulate matter as currently written “PM_{10/2.5}” is confusing since it looks like a fraction. Where applicable, please correct the abbreviations such that it appears like either of the following: “PM₁₀/PM_{2.5}” or “PM₁₀ and PM_{2.5}.”
7. Section 6, Table 2: The word “turbine” and the units “lb/hr” is missing under the heading in the fourth column from the left. The units “tons/year” is also missing from the last column on the right. In addition, why is there is no emissions data presented for CO @ 7.5 ppmvd?
8. Section 6, Table 3: There is a footnote “6” cited in the table but it is missing at the bottom of page 7. Please include the footnote.
9. Section 6, Footnote “7”: Similarly, there is a footnote “7” at the bottom of page 8, however the citation is missing from Table 4 under the row for “Formaldehyde” perhaps.

10. Section 8, page 13: The numbering for the tables starting on this page is inconsistent and will need to be re-numbered to avoid confusion because Table “7,” Table “8,” and Table “9” already appear on the previous pages. Table “10” on page 15 will also need to be re-numbered. In addition, any references to the incorrectly numbered tables in text will need to be fixed accordingly.

11. Section 10, Paragraph E: It appears the fire pump engine is subject to NSPS Subpart IIII. Although the emission standards of Subpart IIII are included in the permit (Condition 5.E.), there is no discussion on the applicability of this NSPS in the TSD. The TSD should provide a discussion on which requirements of the NSPS apply to the fire pump engine.