

October 15, 1999

(AR-18J)

Mike Hopkins, Manager  
Air Quality Modeling and Planning  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hopkins:

The purpose of this letter is to provide the Ohio Environmental Protection Agency (OEPA) with the United States Environmental Protection Agency's (USEPA) unresolved comments regarding Columbus Power Partner's (CPP) draft Prevention of Significant Deterioration (PSD) Permit to Install (PTI) #01-7864. This proposed project involves installing two Asea, Brown, Boveri (ABB) 11N2 110 Mega-watt simple cycle combustion turbines in Columbus, Ohio. USEPA still has concerns with the following issues: (1) the emission rate of twenty-five (25) parts per million (ppm) of Nitrogen Oxides (NOx) for the two combustion turbines presented in the permit does not satisfy Best Available Control Technology (BACT) emission rates for other similar sources and (2) the cost analysis for applying Selective Catalytic Reduction (SCR).

#### BACT Analysis

A BACT analysis should involve a top-down process, as described in the 1990 New Source Review Workshop Manual, in order to evaluate all control options and select the most effective option. This selection considers technical feasibility and control effectiveness (which includes energy impacts, economic impacts, and environmental impacts) of all control options. The USEPA is aware of other simple cycle combustion turbines that went through the PSD process with lower permitted NOx emission rates than what CPP has proposed.

Cost Analysis

CPP dismissed SCR, one control option for achieving reduction of NOx emissions, on the basis of being cost prohibitive. USEPA has concerns that some of the cost figures may have been inflated. It is unclear that the cost figures given are appropriate and consistent with similar permitted facilities. Please supply additional support information regarding the cost analysis of SCR control.

Finally, it appears that CPP wanted to have the turbines in operation for the summer of 2000 and made preparations to achieve this. This activity is not prohibited under the Clean Air Act as addressed in both the December 18, 1978, memo from Edward E. Reich to Enforcement Division Directors and March 28, 1986, memo from Edward E. Reich to Robert R. DeSpain (enclosed). However, the December 18, 1978, memo further states "Any activities undertaken prior to issuance of a PSD permit would, of course, be solely at the owner's or operator's risk". This concept is also restated in an August 23, 1999, Region 4 letter from Winston A. Smith to John E. Hornback of Kentucky's Department for Environmental Protection (enclosed). It stated "However, this was a startup commitment date elected by the applicant at the applicant's own risk.....".

Conclusion

USEPA does not believe the emission rate of 25 ppm of NOx represents BACT for simple cycle combustion turbines and would also request more information regarding the cost analysis for SCR control. As drafted, it is the position that PTI #01-7864 does not meet the requirements of the Clean Air Act.

We look forward to working with you to come up with an agreeable solution. If we can answer any questions regarding this letter, please contact Jorge Acevedo, of my staff, at (312) 886-2263.

Sincerely yours,

/s/

Pamela Blakley, Acting Chief  
Permits and Grants Section (IL/IN/OH)

Enclosures