

Holladay, Cleve

From: Koerner, Jeff
Sent: Friday, March 10, 2006 1:06 PM
To: Halpin, Mike; Holladay, Cleve
Subject: RE: Seminole Unit 3

This would just be an emissions cap, which we could always do. NSR Reform allows a "PAL" - a Plantwide Applicability Limit, which is not what they're requesting. I think you're right, this is really more of a modeling issue: Is the requested flexibility supported by the modeling analysis they provided?

Jeff

From: Halpin, Mike
Sent: Friday, March 10, 2006 12:06 PM
To: Holladay, Cleve
Cc: Koerner, Jeff
Subject: Seminole Unit 3

Cleve –

I'm just digging into the subject application, but I already have something I need to know from you. Seminole has requested SO₂, NO_x and SAM limits to be "lumped together" for units 1 and 2; in other words, they provided a lb/MMBtu value for each pollutant that represents a combined/24-hr average limit.

I believe with the new NSR Rules, such a limit is possible (Jeff?), but I'm unsure what happens if one unit is load limited or off line.... Can the "other" unit operate at a higher value as long as the 'combined' lb/hr values are not exceeded? For the purposes of netting, the annual (TPY) values are the key criteria, hence they might be able to make the argument that if a unit is load limited or off line, the other unit CAN emit at a higher rate and "make up the difference".

Can you tell me what the maximum individual unit emissions were that were modeled for each of these pollutants, and what the units were (lb/hr, lb/MMBtu, or other)?

Thanks

Mike