

Holladay, Cleve

From: Halpin, Mike
Sent: Thursday, March 23, 2006 9:48 AM
To: Holladay, Cleve
Cc: Koerner, Jeff; Vielhauer, Trina
Subject: FW: Netting Analysis for New Seminole EUSGU

Cleve -

See Jim Little's point below.... it is this:
It is possible that a ton of SO₂ that is reduced on the existing unit (i.e. Seminole 1 or 2) does not offset a ton of SO₂ that is added on the new unit (Seminole 3) if the stack/flue gas parameters are significantly different... this is on an ambient basis, not the tonnage totals.

Jim's counsel is to take a look at this via a modeling perspective, since in one state (Kentucky) a netting project was challenged on that basis.

We need to be able to say within our evaluation that we looked at this, and we conclude that the reductions on Units 1&2 have "approximately the same qualitative significance for public health and welfare" as the increases on Unit 3; conversely, if you believe that they are significantly different, we will need to talk very soon.

Thanks
Mike

-----Original Message-----

From: Little.James@epamail.epa.gov [mailto:Little.James@epamail.epa.gov]
Sent: Wednesday, March 22, 2006 3:26 PM
To: Halpin, Mike
Subject: Netting Analysis for New Seminole EUSGU

Mike -

As you review the PSD netting analysis for the proposed Seminole Electric Cooperative Unit 3 project, please keep in mind a regulatory requirement that many people (including me) often overlook. The requirement is found in your (and our) definition of "net emissions increase." A decrease in emissions is creditable in a netting analysis only if "It has approximately the same qualitative significance for public health and welfare as that attributed to the increase from the particular change." Please call me if you have any questions about what this requirement means.

Jim Little - EPA Region 4
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