From: Cascio, Tom
To: Read, David
Subject: FW: DEF Draft Permit 0170004-049-AV
Date: Tuesday, April 28, 2015 1:22:00 PM

Jamie's earlier comments.

From: Hunter, John J (Jamie) [mailto:John.Hunter@duke-energy.com]
Sent: Monday, March 16, 2015 4:24 PM
To: Read, David
Cc: Koerner, Jeff; Cascio, Tom; Linero, Alvaro; Kennedy, Mike
Subject: DEF Draft Permit 0170004-049-AV

In order to better focus DEF's comments on the recently issued draft/proposed Title V permit revision (0170004-049-AV), we are seeking clarification on the Department's intent regarding the language in the following items.

- In specific condition B.44 the emission standard is expressed as "1.2 lb/TBtu" and in specific condition B.45 reporting of emissions is required "in units of lb/TBtu". Both of these terms relate to the heat input based version of the MATS standard. The MATS rule also allows for the standard to be applied in terms of generation output. Was it the Departments intent to cover both the input and output forms of the standard in the specific condition language?

- The monitoring language in specific condition B.46 states:

  "The permittee shall properly install all CEMS and CMS and certify that these systems are fully functional prior to April 16, 2015, as specified in the MATS rule and that the data will be available in the manner described in the MATS rule."

  As noted in the schedule the mercury CEMS will not be installed and certified prior to April 16, 2015. Was it the Department's intent that a sorbent trap CMS being in service prior to April 16, 2015 was sufficient? Was it the Department's intent that the sorbent trap CMS be fully certified by EPA methods prior to April 16, 2015, or that DEF need only "certify" that the system is "fully functional" prior to April 16, 2015?

  If the intent is to have a fully certified sorbent trap CMS prior to April 16, 2015, the phrase "as specified in the MATS rule" must be removed, as there is not sufficient time between now and April 16th to comply with the 60-day notification of a "performance evaluation" as required by the rule – even if there is sufficient time (which there may not be) to arrange and conduct the performance evaluation.

  Actually, the phrase "as specified in the MATS rule" must be removed in any event, as it is either untenable under the above circumstance or inapplicable otherwise.

- The language in specific condition B.47 states that "the permittee shall report MATS

compliance data to the Department" on a quarterly basis during the one-year extension period. Was it the Department's intent that DEF report to the Department only the mercury related portions of the MATS data that, not for the extension, would otherwise be required to be submitted to EPA during the extension period?

Please respond to the above as soon as possible, so that we may better develop appropriate comments on the draft permit.

Thanks.

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