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----- Forwarded by Joseph Lapka/R9/USEPA/US on 06/02/2009 03:20 PM -----

From:
Joseph Lapka/R9/USEPA/US
To:
Jagmeet.Kahlon@valleyair.org
Date:
06/02/2009 03:17 PM
Subject:
Comments on the PDOC for the Lodi Energy Center

Jagmeet,
As discussed yesterday on the phone, here are my comments on the PDOC for the Lodi Energy Center. Please feel free to call me if you would like to discuss them.

1. The BACT analysis in Appendix E of the PDOC states that BACT for emissions of carbon monoxide from the gas turbine system is 4.0 ppmvd @ 15% O₂ or less with an oxidation catalyst and natural gas fuel. The analysis concludes that because the applicant has proposed a limit of 3.0 ppmv, BACT requirements are satisfied. PDOC, Appendix E at iii. Please be aware that in 2003 the South Coast AQMD made a BACT determination for carbon monoxide of 2.0 ppm over a three-hour average for the Vernon City Light & Power facility (see <http://www.aqmd.gov/bact/394164VernonCity.doc>). EPA has confirmed with the SCAQMD that the plant is operating in compliance with those limits. The District should consider this BACT decision in its analysis.

2. Despite the fact that the applicant has proposed to use GE's Rapid Response technology to reduce the duration of gas turbine startup events and the emissions associated with them, the District proposes to allow the facility six hours for all startup periods. PDOC at 78. Six-hour startup periods have commonly been allowed for combined cycle facilities without rapid start technology so it is reasonable to expect a plant with such technology to start up in less time, especially in cases where the steam turbine and associated equipment is still warm. Further, recent proposals for other projects allowed for much less time. For example, the PDOC for the GWF Tracy Combined Cycle Power Plant recently prepared by the District proposed a startup duration of three hours. See GWF Tracy PDOC at 102. In light of this, the District should reconsider the proposed startup period for cold starts and specify a separate shorter duration for warm starts.

3. The PDOC states that NO_x ERCs will be used to offset VOC emissions and that SO_x ERCs will be used to offset PM₁₀ emissions at a ratio of 1:1 in both cases. EPA understands that the District would like to discuss recent comments we submitted in the GWF Tracy case regarding interpollutant offset trading; the proposal to use interpollutant offset trading in this case should be included in our future discussions and the matter should be resolved prior to issuance of the Final Determination of Compliance.

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