



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 N. 5<sup>th</sup> STREET  
KANSAS CITY, KANSAS 66101

AIR PERMITTING AND  
COMPLIANCE BRANCH

January 26, 2005

W. Clark Smith  
Permitting Section Supervisor  
Air Quality Division  
Nebraska Department of Environmental Quality  
PO Box 98922  
Lincoln, NE 68509-8922

Dear Mr. Smith:

We have reviewed the draft Prevention of Significant Deterioration (PSD) permit for Omaha Public Power District's (OPPD) new 660 MW coal-fired electric generating unit. The new unit will be located at the Nebraska City Station. We have the following comments on the draft permit.

1) We believed the Best Available Control Technology (BACT) limit for SO<sub>2</sub> is too high. The permit basis the BACT limit on 90% control and assumes a coal with a sulfur content that results in an uncontrolled emission rate of 1.0 lb/MMBtu. However, coals that OPPD are likely to purchase will have actual uncontrolled SO<sub>2</sub> emissions less than 1.0 lb/MMBtu. A discussion of the uncontrolled SO<sub>2</sub> emissions, that are likely from the coal OPPD plans to purchase, is in a June 30, 2004 comment letter on the City Utilities of Springfield Southwest Power Station Unit 2. This letter is available on the Internet at [http://www.epa.gov/region07/programs/artd/air/nsr/r7comments/city\\_utilities\\_of\\_springfield\\_ps\\_d\\_comments.pdf](http://www.epa.gov/region07/programs/artd/air/nsr/r7comments/city_utilities_of_springfield_ps_d_comments.pdf). The PSD application also provides some information on the sulfur content of coals in Appendix C. The highest sulfur content on their table is 0.42%. This would result in uncontrolled SO<sub>2</sub> emissions of 0.83 lb/MMBtu. As you can see from this analysis, a limit of 0.10 lb/MMBtu is not BACT since it allows the FGD to operate below its potential SO<sub>2</sub> collection efficiency. To assure the permit requires BACT over a wide variety of coals, we suggest setting an SO<sub>2</sub> percent reduction requirement and requiring OPPD to install, operate, maintain, and quality assure inlet SO<sub>2</sub> CEMS, as well as the required stack CEMS. Since NSPS Subpart Da already requires these CEMS, it should not be an imposition to include in the permit. An alternative to a percent reduction requirement would be to create BACT limits for various ranges of SO<sub>2</sub> inlet concentrations.

2) We recommend the permit contain the number of runs per test, minimum test time, and minimum test volume in condition XIII(F). We also recommend that NDEQ required Method 201 or 201A and Method 202 instead of Method 5 and Method 202 for the PM<sub>10</sub> testing. Our hope is to get permitting authorities to use these test methods to make the test results and permit

limits easier to compare.

3) We suggest the Nebraska Department of Environmental Quality (NDEQ) revise XIII(I)(3)(d) to require OPPD to send NDEQ a copy of the vendor-guaranteed maximum total liquid drift.

4) NDEQ needs to revise condition XIII(E) to require the notification for the Stationary Reciprocating Internal Combustion Engines rule as required by 40 CFR § 63.6590(b).

I would also like to remind you to put the final BACT determinations into the RACT/BACT/LAER Clearinghouse after the permit is issued. Please contact Ward Burns of my staff at (913) 551-7960 if you have any questions regarding this letter.

Sincerely,

JoAnn M. Heiman  
Chief  
Air Permitting and Compliance Branch