

February 16, 1990

Mr. William C. Campbell, III  
Cogentrix, Inc.  
9405 Arrowpoint Boulevard  
Charlotte, NC 28217

Dear Mr. Campbell:

We know that you are anxious to expedite the processing of your PSD permit for a power-generation facility. We, too, are committed to that goal, but we must work together to achieve it.

In order to enhance the process, we have developed target emission guidelines which we believe are both technically and economically feasible for coal-fired facilities. Each applicant must do a complete PSD review and thorough study and documentation of "top-down" Best Available Control Technology. This should include starting with the most stringent control option. The technical and economic feasibility of that option should be carefully reviewed and documented. If you believe that such a control option is inappropriate for your facility, then select the next "best" control option and repeat the technical and economic feasibility analysis. This process should continue until a control option cannot be discarded on technical or economic feasibility issues. BACT is a case-by-case determination and it remains the responsibility of the applicant to demonstrate the appropriate option for his facility.

A copy of a typical outline for a PSD submittal is enclosed for your information and use.

GUIDELINE LIMITS FOR COAL-FIRED UNITS

Total Suspended Particulates (TSP)	0.020 lbs/million btu
PM-10	0.018 lbs/million btu
SO <sub>2</sub>	0.16 lbs/million btu
Minimum SO <sub>2</sub> Scrubber efficiency	92%
Nox	0.3 lbs/million btu
CO	0.20 lbs/million btu
VOC	0.03 lbs/million btu

If you have any questions or comments on any of the above, please contact John M. Daniel, Jr. (804) 786-3248 or Pam Faggert (804) 786-5481.

Sincerely,

Wallace N. Davis  
Executive Director

cc: Asst. Executive Director - Technical Operations  
Director, Div. of Technical Evaluation  
Regional Directors  
Director, Div. of Computer Services

TYPICAL OUTLINE  
FOR  
PSD PERMIT APPLICATION

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