

Texas Commission on Environmental Quality
Investigation Report
Entergy Texas, Inc.
CN603282054

ENTERGY TEXAS LEWIS CREEK PLANT

RN100226877

Investigation # 994250

Incident #

Investigator: RACHEL PRICE

Site Classification

MAJOR SOURCE

Conducted: 03/22/2012 -- 03/22/2012

SIC Code: 4911

NAIC Code: 221112

NAIC Code: 221119

NAIC Code: 221122

RECEIVED

AUG 01 2012

TCEQ
CENTRAL FILE ROOMProgram(s): AIR NEW SOURCE
PERMITS

Investigation Type : Site Assessment File Review

Location : 11191 Longstreet Rd

Additional ID(s) : MQ0009F
45603Address: 11191 LONGSTREET RD;
WILLIS, TX 77318Activity Type : REGION 12 - HOUSTON
PMPRCH116 - AIR PMPR - CHAPTER 116
PERMIT PROVISION REVIEWPrincipal(s) :

Role	Name
RESPONDENT	ENTERGY TEXAS INC

Contact(s) :

Role	Title	Name	Phone
Regulated Entity Contact	ENVIRONMENTAL SUPPORT MANAGER	MR FRED MANHART	Work (281) 297-3304

Other Staff Member(s) :

Role	Name
QA Reviewer	COREY ZINDLER
Supervisor	CAROLYN GUILLORY

Associated Check ListChecklist NameAIR PERMITS REQUEST FOR COMMENTS AND
NSR PERMIT CONDITIONUnit Name

ENTERGY TEXAS INC

Investigation Comments :

INTRODUCTION / INVESTIGATION SUMMARY

Introduction

On 03/09/12 the Texas Commission on Environmental Quality (TCEQ) Houston Regional Office received a Request for Comments (RFC) from the TCEQ Air Permits Division (APD) for Permit # 45603 for Entergy Texas Lewis Creek Plant (Entergy).

Daily Narrative

On 03/22/12, Ms. Rachel Price-Taylor of the TCEQ conducted an in-house review of the

proposed draft permit amendment for Permit # 45603.

The following was sent to the permit writer via e-mail on 3/22/12:

Request for Comments - Draft Conditions

TCEQ - Air Permits Division

Phone: (512)239-1250

Fax: (512)239-1300

Mailing Address: TCEQ, Air Permits, P.O. Box 13087, Austin, TX 78711-3087

TO: Region: 12 City: Willis County: Montgomery

Account No.: MQ-0009-F

Submitted by: Ms. Bridget Malone

Email: Bridget.Malone

Phone: (512)239-4286

Date Request Submitted: 03/09/12

Comments Deadline: 03/23/12

For deadlines less than 21 days section Manager approval is required.

Date Application Received by TCEQ in Austin: 01/05/11

REGIONAL OFFICES: Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed.

LOCAL PROGRAMS: The company below has submitted an application for the project referenced below in accordance with regulations of the TCEQ. Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed. Permit Reviewer may request faster response if needed. If no comments are received within this time frame, we will assume you have no comments or objections to the project as proposed. Please return a complete copy of the form (both sides) with your comments.

Project Type.: Amendment

New MSS: No

Project No.: 162516

Permit No.: 45603

TCEQ Regulated Entity No.: RN100226877

Company Name: Entergy Texas Inc

Customer Reference No.: CN603282054

Plant Name: Lewis Creek Plant

Location: 11191 Longstreet Rd

Unit Name: Lewis Creek Plant

County: Montgomery

Technical Contact: Fred Manhart

Phone: (281)297-3304

Operating Schedule: Continuous? ____

Hours/Day____ Days/Week____ Weeks/Year____ Night Operation____

Engineer's Comments: None

Attachments: MAERT, Draft Conditions

Request for Comments – Draft Permit

3/22/2012 Inv. # - 994250

Page 3 of 5

RESPONSE

TO: Ms. Bridget Malone, Austin

From: Region: 12 City: Willis County: Montgomery

Account No.: MQ-0009-F

Copy of Application Received by your Office: ☒ YES ☐ NO Date Received: 12/20/11

Company Name: Entergy Texas Inc

Permit No.: 45603

Regulated Entity No.: RN100226877

Project No.: 162516

Investigator's/Compliance Officer's Name (Please Print):

Rachel Price-Taylor

Phone: 713-767-3753

Comments Deadline (from pg. 1): 03/23/12

Date of Last Site Visit: Site Permit Compliance Investigation (SPCI) was conducted on 02/02/12.

Comments on Conditions: (Please mark up compliance schedule with your comments. Please address applicability and enforceability. List any additional conditions below:

Please note that the scope of the review is typically limited to the affected sources within the project, although suggestions to improve the enforceability of condition not related to the specific permit action may be provided with justification. Please also note that changes in permit stringency during a renewal process must meet the criteria of Texas Health and Safety Code 382.055(e) and should be submitted with justification.

Compliance Determination Conditions:

No comment.

Operational Limitations:

No comment.

General Comments:

No comment.

If you have any objections to issuance, please note them here:

No comment.

Exit Interview

An exit interview with Entergy was not conducted during this permit review process.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

Entergy is a electric service plant.

BACKGROUND

Current Enforcement Actions

Comments from regional staff regarding current enforcement actions are included in the daily narrative subsection above, if applicable.

Agreed Orders, Court Orders, and Other Compliance Agreements
Comments from regional staff regarding Agreed Orders, Court Orders, and other Compliance Agreements are included in the daily narrative subsection above, if applicable.

Complaints
Comments from regional staff regarding any complaints are included in the daily narrative subsection above, if applicable.

Prior Enforcement Issues
Comments from regional staff regarding any prior enforcement issues are included in the daily narrative subsection above, if applicable.

ADDITIONAL INFORMATION / RECOMMENDATIONS

Conclusions and Recommendations
Comments from regional staff regarding applicability and enforceability are included in the daily narrative subsection above.

Additional Issues
Additional issues are included in the daily narrative subsection above, if applicable.

List of Report Attachments

1. Copy of Request for Comments and Permit Special Conditions sent from APD.

No Violations Associated to this Investigation

Signed Rachel Price - Taylor
Environmental Investigator

Date 3/22/12

Signed Carolyn Gullion
Supervisor

Date 4/8/12

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)

☐ Maps, Plans, Sketches

☐ Letter to Facility (specify type) : _____

☐ Photographs

☐ Investigation Report

☐ Correspondence from the facility

☐ Sample Analysis Results

☒ Other (specify) :

☐ Manifests

☐ NOR

*Attachment 1: Copy of Request
for Comments and Permit
Special Conditions sent from
APD.*

Attachment 1

Copy of Request for Comments and Permit Special Conditions sent from APD.

Entergy Texas Inc

Lewis Creek Plant

MQ-0009-F

RN100-226-877

CN603282054

Investigation No. 994250

Investigation Date: 3/22/12

12/20/11

Request for Comments -- Draft Conditions

TCEQ -- Air Permits Division

Phone: (512)239-1250

Fax: (512)239-1300

Mailing Address: TCEQ, Air Permits, P.O. Box 13087, Austin, TX 78711-3087

TO: Region: 12 City: Willis County: Montgomery Account No.: MQ-0009-F

Submitted by: Ms. Bridget Malone E-Mail ID: Bridget.Malone Phone: (512) 239-4286

Date Request Submitted: March 9, 2012

Comments Deadline: March 23, 2012

For deadlines less than 21 days Section Manager approval is required.

Date Application Received by TCEQ in Austin: January 5, 2011

REGIONAL OFFICES: Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed.

LOCAL PROGRAMS: The company below has submitted an application for the project referenced below in accordance with regulations of the TCEQ. Please return comments ASAP, but no later than the comments deadline which is 21 days from the submittal date. Permit disposition will proceed after comments are received or after the comments deadline has passed. Permit Reviewer may request faster response if needed. If no comments are received within this time frame, we will assume you have no comments or objections to the project as proposed. Please return a complete copy of the form (both sides) with your comments.

PROJECT TYPE: Amendment

NEWLY AUTHORIZED MSS? ☐ YES ☐ NO

PROJECT NO.: 162516

REGULATED ENTITY NO.: RN100226877

PERMIT NO.: 45603

COMPANY NAME: Entergy Texas Inc

CUSTOMER REFERENCE NO.: CN603282054

PLANT NAME: Lewis Creek Plant

LOCATION: 11191 Longstreet Rd

UNIT NAME: Lewis Creek Plant

COUNTY: Montgomery

TECHNICAL CONTACT: Fred Manhart

PHONE: (281) 297-3304

OPERATING SCHEDULE: Continuous? ☐

Hours/Day ☐ Days/Week ☐ Weeks/Year ☐ Night Operation? ☐

Engineer's Comments

Attachments: MAERT, Draft Conditions

Comment [hsm1]: Please describe the scope of the project and specify which Special Conditions are being changed and which units are affected by this permit action.

Investigation Type: Impr

Int NO: MQ-0009-F

Page: 1

1 of 5

**Request for Comments -- Draft Permit
RESPONSE**

TO: Ms. Bridget Malone, Austin

FROM: Region: 12 City: Willis County: Montgomery Account No.: MQ-0009-F

Copy of Application Received by your Office: ☐ YES ☐ NO Date Received: _____

COMPANY NAME: Entergy Texas Inc

PERMIT NO.: 45603

REGULATED ENTITY NO: RN100226877

PROJECT NO.: 162516

Investigator's/Compliance Officer's Name (Please Print): _____

Phone: _____

Comments Deadline (from pg. 1): **March 23, 2012**

Date of Last Site Visit: _____

COMMENTS ON CONDITIONS: (Please mark up draft special conditions with your comments. Please address applicability and enforceability. List any additional conditions below):

Please note that the scope of the review is typically limited to the affected sources within the project, although suggestions to improve the enforceability of conditions not related to the specific permit action may be provided with justification. Please also note that changes in permit stringency during a renewal process must meet the criteria of Texas Health and Safety Code 382.055(e) and should be submitted with justification.

Compliance Determination Conditions: _____

Operational Limitations: _____

GENERAL COMMENTS: : _____

PERMIT ISSUANCE:

If you have any objections to issuance, please note them here:

Special Conditions

Permit Number 45603

Investigation type: PMR

Air Account NO: MQ-0009-F

Attachment: 1

Page 2 of 5

Electric Generating Facility (EGF) Conditions - Units 1 and 2

1. Boiler B-1 and Boiler B-2 (Emission Point Nos. [EPNs] B-1 and B-2) emissions are authorized in accordance with Title 30 Texas Administrative Code Chapter 116 (30 TAC Chapter 116), Subchapter I, concerning EGF Permits.
2. Boiler B-1 and Boiler B-2 are subject to Title 40 Code of Federal Regulations Part 75 and the Emissions Banking and Trading Allowances program under Title 30 Texas Administrative Code Chapter 101, Subchapter H, Division 2 and Division 3.

Voluntary Emission Reduction Permit (VERP) Special Conditions

3. The VERP applies to the Fuel Oil Storage Tank No. 301 (EPN T-1).
4. All records required in this permit shall be made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency with jurisdiction.
 - A. Records of fuel oil purchases to include quantity of fuel added and the sulfur content of the fuel being added shall be kept at the plant for a minimum of five years.
 - B. A copy of this permit and the permit application dated August 30, 2000 and subsequent representations submitted to the TCEQ shall be kept at the plant for the life of the permit.

Maintenance, Startup and Shutdown Requirements (3/12)

5. This permit authorizes the emissions from the planned maintenance, startup, and shutdown (MSS) activities listed in Attachment A, Attachment B, or the MAERT attached to this permit. Attachment A identifies the inherently low emitting (ILE) planned maintenance activities that this permit authorizes to be performed. Attachment B identifies the planned maintenance activities that are non-ILE planned maintenance activities that this permit authorizes to be performed. (3/12)
6. The holder of this permit shall minimize emissions during planned maintenance, start-up and shutdown (MSS) activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility. (3/12)

7. Vacuum trucks that are used to move liquids during planned maintenance activities shall utilize submerged loading. **(3/12)**
8. Compliance with the emissions limits for planned MSS activities identified in the MAERT attached to this permit may be demonstrated as follows. **(3/12)**
 - A. For each pollutant emitted during ILE planned maintenance activities, the permit holder shall annually confirm the continued validity of the estimated potential to emit represented in the permit application for all ILE planned maintenance activities. The total emissions from all ILE planned maintenance activities (See Attachment A) shall be considered to be no more than the estimated potential to emit for those activities that are represented in the permit application.
 - B. For each pollutant emitted during non-ILE planned maintenance activities (See Attachment B) whose emissions occur through a stack, but are not measured using CEMS, the permit holder shall do the following for each calendar month.
 - (1) Determine the total emissions of the pollutant through the stack that result from such non-ILE planned maintenance activities.
 - (2) Once monthly emissions have been determined for 12 months after the MSS permit amendment has been issued, the permit holder shall compare the rolling 12-month emissions for the pollutant to the applicable annual planned MSS emissions limit in the MAERT.
9. With the exception of the emission limits in the MAERT attached to this permit, the permit conditions relating to planned MSS activities do not become effective until 180 days after issuance of the permit amendment that added such conditions. **(3/12)**

General Requirements

10. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources -Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in that attached table. **(3/12)**
11. The following facilities are authorized by permits by rule (PBR) under 30 TAC Chapter 106. **(3/12)**

Facilities	Authorization
Comfort Heating	§ 106.102
Bench Scale Laboratory Equipment	§ 106.122
Handheld and Manually Operated Machines	§ 106.265
Refrigeration Systems	§ 106.373
Surface Coat Facility	§ 106.433

Storage of Holding of Dry Natural Gas	§ 106.471
Organic and Inorganic Liquid Loading and Unloading	§ 106.472
Organic Liquid Loading and Unloading	§ 106.473
Hydrochloric Acid Storage	§ 106.474
Pressurized Tanks or Tanks Vented to a Firebox	§ 106.475
Pressurized Tanks or Tanks Vented to Control	§ 106.476
Anhydrous Ammonia Storage	§ 106.477
Storage Tanks and Change of Service	§ 106.478
Portable and Emergency Engines and Turbines	§ 106.511

Dated March XX, 2012

Investigation Type: PMPP
 Air Account NO: MR-0005-R
 Attachment: 1
3 of 5

Attachment A

Permit No. 45603

Inherently Low Emitting (ILE) Planned Maintenance Activities

Planned Maintenance Activity	Emissions					
	NH ₃ /urea	VOC	NO _x	CO	PM	SO ₂
Storage tank/vessel maintenance ¹	x					
Catalyst handling and maintenance ²					x	
Inspection, repair, replacement, adjusting, testing, and calibration of analytical equipment, process instruments including sight glasses, meters, gauges, CEMS, PEMS		x	x	x		
Small equipment and fugitive component repair/replacement in VOC and NH3 service ³	x		x			

Notes:

1. Includes, but is not limited to, related emptying, degassing and cleaning.
2. Includes, but is not limited to, replacement, cleaning, activation, and deactivation of SCR and oxidation catalysts.
3. Includes, but is not limited to, (i) repair/replacement of pumps, compressors, valves, pipes, flanges, transport lines, filters and screens in natural gas, fuel oil, diesel oil, ammonia, lube oil, and gasoline service, (ii) vehicle and mobile equipment maintenance that may involve small VOC emissions, such as oil changes, transmission service, and hydraulic system service, and (iii) off-line NO_x control device maintenance (including maintenance of the anhydrous ammonia systems and aqueous ammonia systems associated with SCR systems and SNCR systems).

Dated March XX, 2012

Attachment B

Permit No. 45603

Non-ILE Planned Maintenance Activities

Planned Maintenance Activity	EPN	Emissions					
		NH3 /urea	VOC	NOx	CO	PM	SO ₂
NO _x control device maintenance-unit online	MSS-FUG	x		x			

Dated March XX, 2012

Investigation Type: PM/PA
 Air Account ID: me-003-F
 Attachment NO: 1
 Page 4 of 5

Emission Sources - Maximum Allowable Emission Rates

Permit Number 45603

Investigation Type: RMPC

Air Account NO: MR-0007-F

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
T-1	Fuel Oil Tank No. 301	VOC	0.46	0.50
FUG	Fugitive Emissions (5)	VOC	0.05	0.23
B-1	Ammonia Emissions from the SCR for EPN B-1	NH ₃	11.84	51.9
B-2	Ammonia Emissions from the SCR for EPN B-2	NH ₃	11.84	51.9
FUG-351 (5)	Ammonia Fugitive Emissions from the SCR	NH ₃	<1.0	<1.0
MSS-FUG	MSS Fugitive Emissions from ILE and non-ILE Activities	NO _x	0.0007	0.00002
		CO	0.0004	0.00001
		PM	0.0004	0.00001
		PM ₁₀	0.0002	0.000004
		PM _{2.5}	0.00003	0.00000
		NH ₃	12.5219	0.3002

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 NO_x - total oxides of nitrogen
 SO₂ - sulfur dioxide
 PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 CO - carbon monoxide
 NH₃ - ammonia
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

Emission Sources - Maximum Allowable Emission Rates

Date: March XX, 2012