

Kathleen Hartnett White, Chairman R. B. "Ralph" Marquez, Commissioner Larry R. Soward, Commissioner Glenn Shankle, Executive Director



AIR DERC_100215979-300100_ CE_20041020_Certification

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 20, 2004

Ms. Kimberly Hughes Air Quality Engineer American Electric Power P.O. Box 660164 Dallas, Texas 75266-0164

Re: Review of Discrete Emission Reduction Credits Generation

Lon C. Hill Power Station Corpus Christi, Nueces County

Regulated Entity Number: RN100215979 Customer Reference Number: CN601572753

Dear Ms. Hughes:

This letter is in response to your Form DEC-1, entitled "Notice of Generation and Generator Certification of Discrete Emission Credits," dated January 16, 2004. We have reviewed your request and are unable to approve the credits claimed for the following reason:

By Title 30 Texas Administrative Code (30 TAC) § 101.373 (a)(2)(A), Discrete Emission Reduction Credits (DERCs) may not be generated by temporary shutdowns or permanent curtailment of activity at a facility. Since the shutdown of the Lon C. Hill Power Station was not made permanent by a permit withdrawal this facility is unable to receive DERCs for this reduction.

Your application was voided on October 1, 2004. To reactivate the voided application, please submit a new DEC-1 application form and supporting documentation. Please be aware that in accordance to 30 TAC § 101.373(c)(1) an application must be submitted within 90 days after the end of the reduction strategy.

Please reference the regulated entity number (RN) and customer reference number (CN) noted in this document in all your future banking and trading correspondence. The RN replaces the former Texas Commission on Environmental Quality account number for the facility or site. The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Ms. Kimberly Hughes Page 2 October 20, 2004

Re: Review of Discrete Emission Reduction Credits Generation

Thank you for your cooperation in this matter. If you have questions concerning this review or need further assistance regarding the banking program, please contact Mr. Joe P. Etheridge at (512) 239-2460 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

PdA. Hyde

Richard A. Hyde, P.E., Director Air Permits Division Office of Permitting, Remediation, and Registration Texas Commission on Environmental Quality

RAH/JPE/mfs

cc: Mr. David Turner, Air Section Manager, Region 14 - Corpus Christi

Project Number: 300100

DISCRETE EMISSION REDUCTION CREDITS (DERCS) VERIFICATION TECHNICAL REVIEW

Project No.:

300100

Project Type: Company:

City:

Project Reviewer:

BDRC American Electric Power

Corpus Christi Mr. Joe P. Etheridge Customer Reference No.:

Regulated Entity No.:

Facility Name:

CN601572753 RN100215979

RN100215979 Lon C Hill Power Station

Nueces

Portfolio Name:

County:

Lon C Hill - Ne0025c

Project Overview

Discrete Emission Reductions Summary

Applicable Pollutants	NOx
If VOCs identify HAPs and Non-HAPs	
Date reduction achieved:	N/A
Most recent year of emissions inventory used for SIP determination:	1997
Generation Period:	1/1/2003 - 12/31/2003
Source:	
Generation County	Nueces
Generation Area	Attainment
If in Dallas/Fort Worth Nonattainment area, identify ozone and non-ozo	one season.
Baseline Period	1997 and 1998
Baseline Emission Factor	
Do Baseline emission factor exceed any applicable Federal, State, or au	thorized limit? No

Generation of Discrete Emission Credits:

Generation Method:

Gasreach and Induced Flue Gas Recirculation (IFGR) was installed on Unit Boiler No. 3 (FIN: LCH3 and EPN: 3A) in1999 to reduce NOx emissions. As of January 1, 2003, the unit was deemed "mothballed" or temporarily shutdown for the entire year of 2003.

By Title 30 Texas Administrative Code § 101.373 (a)(2)(A), Discrete Emission Reduction Credits may not be generated by temporary shutdowns or permanent curtailment of activity at a facility. Since the shutdown of the Lon C. Hill Power Station, Unit 3 was not made permanent by a permit withdrawal this facility was unable to receive DERCs for this reduction.

On September 27, 2004, American Electric Power sent an email voluntarily voiding the application (Notice of Generation and Generator Certification of Discrete Emission Credits, Form DEC-1) for DERCs at the Lon C. Hill Power Station, Unit 3.

Control of Pollutant:

Check applicability of all state and federal requirements to verify that reduction is in excess. Note the potentially applicable sections and state reason for nonapplicability or amount of the reduction not surplus. Please identify the applicability/nonapplicability for each FIN.

DISCRETE EMISSION REDUCTION CREDITS (DERCs) VERIFICATION TECHNICAL REVIEW

Regulated Entity Number: RN100215979RN10054228

Page 2

FIN

NSPS

Exempt from NSPS D, constructed prior to 1971
30 TAC Chapter 117

Conclusion:

Certificate Number issued

N/A

Pollutant

NOX

Amount (Tons)

NOX

O

Team Leader/Section Manager/Backup

From:

Joe Ethridge

To:

kmhughes@AEP.com

Subject:

DERC Credits

Ms. Hughes,

I spoke with you earlier in regard to two facilities that have been deemed "mothballed" by the AEP Environmental Services. The Nueces Bay Power Station, Unit 6 and the Lon C. Hill Power Station Unit 3 have been confirmed to have undergone a temporary shutdown process. As a result of the temporary shutdowns of both units, no Discrete Emissions Reduction Credits (DERCs) can be issued at this time. These credits only apply to permanent shutdowns.

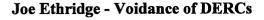
If you have any questions in regard to this, please contact me at (512)-239-2460.

Thank You,

Joe Etheridge TCEQ-Air Permits Emissions Banking and Trading

CC:

Chism, Richard



From: <kmhughes@aep.com>

To: <jethridg@tceq.state.tx.us>

Date: 9/27/2004 9:24 AM Subject: Voidance of DERCs

Joe.

As we just discussed over the phone, AEP accepts the voidance of the DERC applications for Nueces Bay Power Station (Unit 6) and Lon C. Hill Power Station (Unit 3). This voidance is due to the fact that DERCs cannot be claimed for 'mothballed' or temporary shutdown units.

Kimberly M. Hughes, E.I.T. American Electric Power Environmental Services - Air Quality 1616 Woodall Rodgers Freeway Dallas, TX 75202

Phone: 214.777.1155 Fax: 214.777.1380 Audinet: 8.777.1155

E-mail: kmhughes@aep.com

www.aep.com



January 13, 2004

American Electric Power P.O. Box 660164

Dallas, TX 75266-0164

<u>CERTIFIED MAIL</u>
RETURN RECEIPT REQUESTED

7002 2410 0000 2471 7810

Texas Commission on Environmental Quality
Office of Permitting, Remediation and Registration
Emissions Banking and Trading Program, MC 163
P. O. Box 13087
Austin, Texas 78711-3087

Re: Notice of Generation and Generator Certification of DERCs for year 2003

AEP Texas Central Company Lon C. Hill Power Station, Unit 3 TCEQ Account No. NE-0025-C, Standard Permit No. 40642

To Whom It May Concern:

Enclosed for your review is the Notice of Generation and Generator Certification of Discrete Emission Credits (Form DEC-1) for Lon C. Hill Power Station, Unit 3. Also included is supporting documentation for the amount of nitrogen oxide (NOx) credits generated. GasReach and Induced Flue Gas Recirculation (IFGR) was installed on Unit Boiler No. 3 (FIN: LCH3 and EPN: 3A) in 1999 to reduce NOx emissions. As of January 1, 2003, the unit has been 'mothballed' or shutdown for the entire year of 2003.

The form and supporting documentation is submitted on behalf of AEP Texas Central Company, a wholly owned subsidiary of American Electric Power (AEP). If you have questions regarding this submittal, please contact me at (214) 777-1155 or by email at kmhughes@aep.com.

Sincerely,

Kimberly M. Hughes, E.I.T.

Air Quality Engineer

AEP Environmental Services

Enclosures

xc:

Leon Kolodziej, Lon Hill Power Station (w/encl.)

File: LCH.10.10.50.2004 (w/encl.)

JAN 2 3 2004

AIR PERMITS DIVISION



Form DEC-1 (Page 1)

Notice of Generation and Generator Certification of Discrete Emission Credits

(Title 30 Texas Administrative Code § 101.370 - § 101.374)

A notice of generation and generator certification must be submitted to the Texas Natural Resource Conservation Commission (TCEQ) DERC Registry in accordance with the following requirements if the reduction is to be creditable and marketable:

I. COMPANY IDENTIFYING INFORMAT									
A. Company Name: American Electric Power	. Company Name: American Electric Power (AEP)								
B. Owner or Operator of Generator Source: A	AEP Texas Central (Company							
C. Plant/Site Name: Lon C. Hill Power Stati	ion								
D. Street Address: 3501 Callicoatte Road									
E. Nearest City: Corpus Christi	F	. Zip Code: 78410							
G. County: Nueces	Н	I. Primary SIC: 4911							
I. TCEQ Account No.: NE-0025-C									
J. Telephone: 361-242-3618	K	K. Fax: 361-242-3693							
L. Mailing Address: 3501 Callicoatte Road									
City: Corpus Christi	s	tate: TX	Zip Code: 78410						
II. TECHNICAL CONTACT IDENTIFYI	NG INFORMATIO	N							
A. Technical Contact Name: (_Mr. X_Mrs	sMsDr.) Kir	mberly Hughes							
B. Technical Contact Title: Air Quality Engir	neer								
C. Telephone: 214-777-1155 D. Fa	ax: 214-777-1380	E. Email: kmhughes@	@aep.com						
F. Mailing Address: P.O. Box 660164									
G. City: Dallas	S	State: TX	Zip Code: 75266-0164						
III. CONTACT FOR SALE OF CERTIFIC	ATE								
A. Contact Name: (_Mr. X_MrsMs.	Dr.) Kimberly Hu	ighes							
B. Sale Contact Title: Air Quality Engineer									
C. Telephone: 214-777-1155 D. Fa	ax: 214-777-1380	E. Email: kmhughes@	@aep.com						
F. Mailing Address: P.O. Box 660164									
G. City: Dallas	S	State: TX	Zip Code: 75266-0164						
IV. Generation Period									
X 12 months Days/months									
V. Generation Activity									
☑ Shutdown ☐ Additional Control ☐ Other	er:								
Date of Shutdown: 01 / 01 /2003		RECEIV	Date of Reduction: _/_						

TCEQ-10391 (Rev. 08/08/02)
These forms are for use by the sources participating in the
Emission Banking and Trading Program and are subject to revision.(NSRG: 7316 v3)

JAN 2 3 2004

Page _____ of ____



Form DEC-1 (Page 2)

Notice of Generation and Generator Certification of Discrete Emission Credits

(Title 30 Texas Administrative Code § 101.370 - § 101.374)

VI. EMISSIONS RATE DATA											
If SA≥BA	, then: (BE)	rhich demonstrat R*BA) - (SER*S *BA) - (SER*B	SA) = reduction	•	esented in the f	following table.					
					Calculation	of DERCs					
Emission Point No.	FIN	Air Contamin ant	Baseline Activity (units)	Baseline Emission Rate (units)	Strategy Activity (units)	Strategy Emission Rate (units)	Most stringent emission rate (units)	DERCs (T)			
3A	LCH3	NOx	5,998,119 mmBtu	0.425 lb/mmBtu	0 mmBtu	0.00 lb/mmBtu	0.14 lb/mmBtu	1274/.6 1273.10 NOx tons			
			1274.6	1274.6							
- "											
							<u> </u>				
VII. Shutd	l lown Emissi	l on Reduction S	l Strategies	I	ł			J			
	ction shifted ERC cannot		wn facility to ar	nother facility in	the same nona	ttainment area?	☐ Yes* ☑ No				
VIII. VO	С										
List Specif	ic Compoun	ds reduced: N/A	\								
Emission Point No											

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JAN 2 3 2004

Page _____ of ____



Form DEC-1 (Page 3) Notice of Generation and Generator Certification of Discrete Emission Credits

(Title 30 Texas Administrative Code § 101.370 - § 101.374)

Mail application to: Emission Banking and Trading Program TCEQ MC 163 PO BOX 13087 AUSTIN, TX 78711-3087

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JAN 2 3 2004

AIR PERMITS DIVISION OF _____ of ____

AEP Texas Central Company

Lon C. Hill Power Station Unit 3

Discrete Emission Reduction Credit Determination for Year 2003

Emission Reduction Strategy

Description	Emission Reduction Strategy Year	Authorization	Reduction Period
		Unit 3 Standard Permit #	January 1st to December
Induced Flue Gas Recirculation (IFGR)	1999	40642	31st 2003

Emission Inventories

	1995	1996	1997	1998	1999	2000	2001	2002	2003
Air Contaminant	NOx	NOx	NOx						
Emission Factor (lb/mmBtu)	0.378	0.302	0.379	0.470	0.249	0.191	0.284	0.190	0
NOx Rate - Fuel Weighted (lb/mmBtu)				0.470	0.249	0.191	0.284	0.190	0
Average NOx Rate (lb/mmBtu)	0.378	0.302	0.379	0.470	0.249	0.172	0.256	0.162	0
Fuel Used (mmBtu)	3,142,871	2,471,284	4,724,256	7,271,981	5,578,232	5,729,814	4,016,321	261,939	0
Tons per Year (TPY)	261.80	377.78	1043.92	1708.9	694.5	547.2	570.3	24.9	0

Baseline Period

Reduction Period Unit Shutdown

DERC Generation Calculation

Baseline = (1997 EI + 1998 EI)/2		
1376.42	TPY	

Baseline Emission Rate (BER) = (1997 BER + 1998 BER)/2 0.425 lb NOx/mmBtu

Baseline Activity (BA) = Average annual fuel usage from 1997 and 1998
5,998,119 mmBtu

Strategy Emission Rate (SER) = Average Hourly NOx Emission Rate 0.000 lb NOx/mmBtu

Strategy Activity (SA) = Fuel usage during the reduction period 0 mmBtu

if $SA \Rightarrow BA$, then:

DERC = [(BER * BA) - (SER * SA)]

if SA < BA, then:

DERC = [(BER * BA) - (SER * BA)]

1,273.10 DERC's

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JAN 2 3 2004

AIR PERMITS DIVISION

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CENTRAL POWER AND LIGHT COMPANY

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JAN 2 3 2004 AIR PERMITS DIVISION	ECEIVED	SHELL CONS	TRUCTION:			PAINT CO	NDITION:		FILLI	NG METHO)D:
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NOVEMBER 25, JAN 2 3 2004

CENTRAL POWER AND LIGHT COMPANY NEODZSC POINT, CONTROL DEVICE AND ENISSIONS INFORMATION SECTION 2-C AND SECTION 4

AIR PERMITS DIVISION

PLANT ID: L_C_H_ FIN: LCH3 FACILITY NAME: UNIT 3 NOILER STATUS: OPERATING EMISSIONS POINT INFORMATION: POINT NAME: UNIT 3 STACK 4 UT I ZUNE: 14 UTM EAST METERS: 636160 UTM NORTH METERS: 3080875 EPW: 3A PARAMETERS POINT TYPE: STACK DIAMETER HEIGHT VELOCITY TEMPERATURE FELT: 16.70 FEET: 147 FEET/SEC: 40.50 DEG F: 299 SATEMENT INFORMATION: PEHMITS DIVISION NO. UNITS: __ AB CODE: __ DEVICE: ___ CONTROL EFFICENCIES - VOC: ___ % 502: ___ % NOX: ___ % TSP: ___ % PM10: ___ % CO: ___ % 20 OF ACTORS: CRITERIA POLLUTANT ERISSIONS FACTOR EMISSIONS FACTOR UNITS REFERENCE/SOURCE VOC hOX CO Su2 TSP * IF NOT REPORTED, OB RATES MAY HAVE GEN GENERATED BY COMPUTER. ** UPSETS AND NATHIEHANCE EMISSIONS ARE REPORTED SEPARATELY ACTUAL DETERM * DIONE BEASON ** MAINTENANCE ** UPSET ALLOWABLE PERMIT CAS COATAMINANT NAME CODE NUMBER CORTAL RESYNET LOS / DAY TONS/YEAR TONS/YEAR, TONS/YEAR NUMBER 1.9750 AP42 0.0000 10000 PART-U TOTAL PARTICULATE 0.0000 20000 PMID PART-U -1.3750 At 42 0.0000 TOTAL PATO PARTICULATE 2/30 1-8730 AP42 29999 0.0000 -8-3750 AP42 0.0000 50001 NONMETHANE VOC-U A:d730 AP42 0.0000 59999 VOC-TOTAL 169 3-33 -0.000C AP42 0.0000 60000 0.0000 70400 133.3936 CONTMON NITROGEN OXIDES 521.96 -S. 3750 AP42 0.0000 70510 SULFUR DIOXIDE 2.13

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CENTRAL POWER AND LIGHT COMPANY POINT, CONTROL DEVICE AND EMISSIONS INFORMATION SECTION 2-C AND SECTION 4

FIN: LCH3

FACILITY NAME: UNIT 3 BOILER

PLANT ID: L.C.H.

EPN: 3A

POINT NAME: UNIT 3 STACK A

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AIR PERMITS DIVISION JAN 2 3 2004 CHIVE NOVEMBER JAN 28 2004

CENTRAL POWER AND LIGHT COMPANY NEOD25C POINT, CONTROL DEVICE AND ENISSIONS INFORMATION SECTION 2-C AND SECTION 4

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CENTRAL POWER AND LIGHT COMPANY NED025C POINT, CONTROL DEVICE AND EMISSIONS INFURMATION SECTION 2-C AND SECTION 4

FIN: LCH3

FACILITY MAME: UNIT 3 HOLLER

PLANT ID: L.C.H.

EPN: 3a

POINT NAME: UNIT 3 STACK 3

* IF NOT REPORTED, OJ RATES MAY HAVE BEEN GENERATED BY COMPUTER.

** UPSETS AND MAINTENANCE EMISSIONS ARE REPORTED SEPARATELY

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AIR PERMITS DIVISION JAN 2 3 2004

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DECEMBEAR PERMITS DIVISION

CENTRAL POWER AND LIGHT COMPANY
FACILITY INFORMATION
SECTION 2-A AND SECTION 2-B

NE0025C

PAGE:

16

IN: LCH3 FACILITY NAME: UNIT 3 BOILER	PLANT ID: L.C.H.
ACILITY STATUS: ACTIVE (A) CHOOSE LETTER F	ROM BELOW A DATE FOR S, D, OR O CHOICE BELOW: (/)
A - ACTIVE (OPERATING) I - IDLE (FOR EMISSIONS INVENTORY Y S - PERMANENTLY SHUTDOWN (WILL NO L D - DEMOLISHED (REMOVED FROM THE SI N - PERMITTED, BUT NOT BUILT O - OWNERSHIP TRANSFERED TO NEW OWN	VEAR) ONGER OPERATE) ITE) NER:
COMMENT OR EXPLANATION:	
OPERATING SCHEDULE AND PRODUCTION INFORMATION: OPER SCHEDULE: 24.0 HR/DA 7 DA/WK 52 WK/YR	SEASONAL PERCENTAGES: SUMMER: 37% FALL: 27% WINTER: 38% SPRING: 18%
* SCC: 10100601 FACILITY (SCC) DESCRIPTION SCC PROCESS RATE UNITS: MM SCF (SCCPRU)	ON: EXTCOMB BOILER ELECTRIC GENERATN NATURAL GAS > 100MMBTU/HR EXTE) START TIME: PERCENT OF MAXIMUM EMISSIONS POTENTIAL: 31.0%
** ANNUAL PROCESS RATE: 6926 MM SCF	/YEAR ** OZONE SEASON PROCESS RATE: 26.4 MM SCF /DAY
FACILITY COMMENTS: EMISSIONS HAVE BEEN TREA	TED AS GOING EQUALLY TO TWO STACKS.
FACILITY PARAMETER INFORMATION: COMBUSTION UNITS UNIT TYPE: BOILER	FIRING TYPE: FRONT DESIGN CAPACITY: 1450.00 MMBTU / H
TANKS DIAMETER: FEET ROOF TYPE:	VAPOR SPACE HGT: FEET
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DECEMBER 29,JA9982 3 2004

CENTRAL POWER AND LIGHT COMPANY NEO025C POINT, CONTROL DEVICE AND EMISSIONS INFORMATION SECTION 2-C AND SECTION 4

PAGE:

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AIR	PERMITS DIVISION	SECTION 2-C AND SECTION 4		
FIN: LCH3	•	R	PLANT ID: L.C.H.	
EMISSIONS	POINT INFORMATION:			STATUS: OPERATING
	PARAMETERS POINT TYPE: STACK	DIAMETER HEIGHT VELO FEET: 10.70 FEET: 149 FEET	OCITY TEMPERATURE 7/SEC: 40.60 DEG F: 299	
ABATEMENT	INFORMATION:		•	
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CNTM	CAS CONTAMINANT NAME	ACTUAL DETERM * OZONE SEASON TONS/YEAR METHOD LBS / DAY	** MAINTENANCE TONS/YEAR ** UPSET TONS/YEAR	ALLOWABLE PERMIT TONS/YEAR NUMBER
10000	PART-U	26250 AP42 237.2397	0.0000	
19999	TOTAL PARTICULATE	37.2997	0.0000	·
20000	PM10 PART-U	3.6250 AP42 87.2397	0.0000	***************************************
29999	TOTAL PM10 PARTICULATE	3 6250 AP42 37.2397	0.0000	••
50001	NONMETHANE VOC-U	76.3 1.6900 AP42 17.3614 17.1 85.0	0.0000	•••••
59999	VOC-TOTAL	1:8900 AP42 -17:3614	0.0000	
60000	74828 METHANE	0.0000 AP42 0.0000	0.0000	
70400	NITROGEN OXIDES	521-9600 CONTMON 5362.1165 /208.9 /3028	0.0000	•
70510	SULFUR DIOXIDE	0.7800 AP42 /5.4993	0.0000	• • • • • • • • • • • • • • • • • • • •





DECEMBER 29, 1998 AIR PERMITS DIVISION

CENTRAL POWER AND LIGHT COMPANY NEO025C POINT, CONTROL DEVICE AND EMISSIONS INFORMATION SECTION 2-C AND SECTION 4

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FIN: LCH3

FACILITY NAME: UNIT 3 BOILER

PLANT ID: L.C.H.

EPN: 3A

POINT NAME: UNIT 3 STACK A

* IF NOT REPORTED, 03 RATES MAY HAVE BEEN GENERATED BY COMPUTER. ** UPSETS AND MAINTENANCE EMISSIONS ARE REPORTED SEPARATELY

CNTM

CAS CONTAMINANT NAME NUMBER

TONS/YEAR METHOD

ACTUAL DETERM * OZONE SEASON ** MAINTENANCE IS/YEAR METHOD LBS / DAY TONS/YEAR

** UPSET TONS/YEAR ALLOWABLE PERMIT TONS/YEAR NUMBER

CODE

CARBON MONOXIDE

496-4960

0.0000

90300