



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

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AIR PROTECTION BRANCH

Ms. Tyneshia Tate
Environmental Engineer
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
Stationary Source Permitting Program
Nitrogen Oxides (NOx) Unit
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

RE: Draft PSD Permit No. 4911-061-0001-P-01-0 for Yellow Pine Energy Company, LLC

Dear Ms. Tate,

On behalf on the San Joaquin Valley Air Pollution Control District (SJVAPCD) , we appreciate the opportunity to provide comments on Georgia Environmental Protection Division's (EPD's) draft Prevention of Significant Deterioration (PSD) permit for the proposed Yellow Pine Energy Company's project to construct and operate a 110 MW power plant which will utilize a 1,529 MMBtu/hr biomass-fired fluidized bed boiler.

Our specific comment pertains to Georgia EPD's proposed NOx limit of 0.10 lb/MMBtu as specified in Condition 2.11 on page 7 of the draft permit. It may be of interest to EPD that we have several biomass fuel-fired fluidized bed boilers in the SJVAPCD which have been operating Selective Noncatalytic Reduction (SNCR) for several years now. Our lowest permitted NOx limit is 0.08 lb/MMBtu (actual source testing show an average 0.06 lb NOx/MMBtu), which is 0.02 lb/MMBtu lower than being proposed for Yellow Pine. If EPD's proposed 0.10 lb/MMBtu limit is lowered to 0.08 lb/MMBtu, the potential NOx emissions from 1,529 MMBtu/hr boiler (at maximum firing rate) would be 733.9 lb/day (0.367 tons/day) less. We believe that it is appropriate for EPD to consider the same NOx limit that is currently achieved-in-practice by our biomass-fired boiler as well as a shorter averaging period than the proposed 30-day rolling average.

For your information, we currently have SNCR-equipped boilers firing on combination coal, fluid coke, delayed coke, or tire derived fuel with a permit NOx limit of 0.04 lb/MMBtu (24-hour average). In reviewing the draft PSD permit for Yellow Pine, we noted that, on a trial basis, the boiler would also be capable of firing tire-derived fuel in addition to biomass fuel. We would appreciate if EPD can share with us the results of such trial operation.

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Executive Director/Air Pollution Control Officer

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Mr. Joven R. Nazareno from our Rule Development Section has been researching feasible control technologies that could achieve a much lower NOx limit than currently allowed for our existing solid fuel-fired boilers. It appears promising to use SCR in conjunction with SNCR. The results of Mr. Nazareno research will be published in a Feasibility Study Report before the end of this year as required by our Ozone Plan. If indeed a hybrid SCR-SNCR is technologically feasible, then we would likely amend our existing Rule 4352 (Solid Fuel-Fired Boilers, Steam Generators and Process Heaters). He has spoken with Mr. Mark Sajer (Summit Energy Partners) last week regarding the cost effectiveness analysis for regenerative selective catalytic reduction (RSCR) that was submitted to EPD on or about December 3, 2008 which showed \$17,100/ton NOx reduced. Since SJVAPCD's BACT NOx cost effectiveness threshold is \$18,300/ ton, we would have required RCSR especially for a new source or modified permitting project in our District. Also, he has spoken a few times with Mr. Richard Abrams (Babcock Power) regarding the feasibility of using RSCR with our existing SNCR-equipped units.

Should you have any questions regarding our comments or need additional information, please feel free to contact me or Mr. Nazareno at (559) 230-5800, or by email at errol.villegas@valleyair.org or joven.nazareno@valleyair.org.

Best Regards,



Errol Villegas
Planning Manager
San Joaquin Valley Air Pollution Control District
Fresno, CA 93726