

February 8, 1999

Mr. Gregg Cooke, Region Administrator (6RA)  
U.S. Environmental Protection Agency - Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Dear Mr. Cooke:

I represent the citizens group, Citizens for Clean Air and Water (CCAW) of Monroe, Louisiana. CCAW is composed of Monroe-area citizens who are concerned that the restart of the long dormant Monroe Power Plant presently owned by Entergy Louisiana will pose unacceptable impacts on the quality of life of the city neighborhoods around this facility.

Emissions from this plant would directly impact a public park, a school, homes and businesses around this facility which is literally only a few hundred feet away from the community.

The Monroe Power Plant was shut down in December, 1987 and has not operated since that time. At the present time, the Entergy Louisiana has announced plans to restart this long dormant facility under a proposed Clean Air Act Title V operating permit proposed by the Louisiana Department of Environmental Quality (LDEQ). A LDEQ public hearing on the proposed Title V permit is scheduled for February 18, 1999 in Monroe, LA.

It is the position of Citizens for Clean Air and Water that the proposed permit and the planned restart pose serious issues of regulatory compliance with the Clean Air Act. As a result, we are transmitting the enclosed administrative petition to you seeking review by EPA Region 6 of the important issues raised in the petition.

The review by our organization of salient facts and issues has not yet been finally completed, but we wanted to put EPA Region 6 on notice of these issues at the earliest

possible time so that your agency may both comment upon and intervene in this situation.

We recently obtained copies of orders of the Federal Energy Regulatory Commission and the Louisiana Public Service Commission concerning Entergy Services which appear to be a holding company for electricity generation units of which Entergy Louisiana is a participant. The content of these orders casts serious doubt on the validity of Entergy Louisiana's use of its so-called "Extended Reserve Shutdown" system (which includes Monroe Power Plant Units 10, 11 and 12) to argue that this facility was shut down only temporarily for the purpose of PSD compliance. We plan to submit a supplemental brief on this issue shortly, and we will make the FERC and LPSC orders available to your staff.

If you should have questions concerning the matters raised in the attached petition, please do not hesitate to contact me at (318) 325-3200, or Alexander J. Sagady, Environmental Consultant to Citizens for Clean Air and Water at (517) 332-6971.

Thanks again for your consideration of this matter.

Sincerely,

CITIZENS FOR CLEAN AIR &

WATER

Merrijane Yerger

Alexander J. Sagady  
Environmental Consultant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE EPA REGION VI ADMINISTRATOR  
DALLAS, TX

---

IN THE MATTER OF A LOUSIANA )  
DEPARTMENT OF ENVIRONMENTAL )  
QUALITY PROCEEDING TO ISSUE A PROPOSED )  
CLEAN AIR ACT TITLE V OPERATING )  
PERMIT FOR THE MONROE POWER )  
PLANT OF ENTERGY LOUISIANA, INC )

---

**ADMINISTRATIVE PETITION FOR EPA REGION VI REVIEW,  
INTERVENTION, FACT-FINDING AND INVESTIGATION IN  
REGARD TO THE ENTERGY LOUISIANA MONROE POWER PLANT**

1. Citizens for Clean Air & Water, Inc. brings this administrative petition before the Environmental Protection Agency Region VI Administrator pursuant to authority found at 42 U.S.C. §7661d(b). Citizens for Clean Air & Water (hereafter designated as CCAW) is a non-profit organizations of individuals, community members, small businesses and others in the city of Monroe, LA. CCAW has become aware of plans by Entergy Louisiana, Inc. to restart the Monroe Power Plant facility after a long lapse of operation. CCAW is further aware of a pending proceeding of the Louisiana Department of Environmental Quality contemplating proposed issuance of a Clean Air Act Title V operating permit for the Monroe Power Plant with a public hearing scheduled for February 18, 1999 in Monroe, LA.

2 As part of its application, Entergy Louisiana seeks a permit shield under the Clean Air Act Title V provisions that would have the effect of insulating the company from enforcement actions that could be brought in the future based on the identification of underlying factual or legal defects that may become identified by any party.

**Citizen Petition Concerning a Proposed Title V Operating  
Permit for the Entergy Louisiana Monroe Power Plant, Page 2**

---

3. As a result of the concern of CCAW about the implementation of EPA policy concerning Prevention of Significant Deterioration (PSD) applicability associated with the restart of a long closed facility and other factual matters that have become apparent, CCAW seeks review, investigation and administrative determination by EPA Region 6 on the entire matter of the proposed permit and planned restart of the Monroe Power Plant facility, as set forth specifically below in subsequent sections.

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 3**

---

**CCAW SEEKS AN EPA REGION VI DETERMINATION THAT THE MONROE POWER PLANT IS SUBJECT TO PREVENTION OF SIGNIFICANT DETERIORATION REQUIREMENTS BASED ON THE INHERENT PRESUMPTION CONTAINED IN EPA POLICY THAT FACILITIES CLOSED LONGER THAN TWO YEARS MUST BE REVIEWED UNDER THE CLEAN AIR ACT PSD PROVISIONS**

4. It is well established EPA policy that facilities which have been closed for a period of 2 years or more are presumed to be subject to PSD applicability upon a restart as though the facility were a new or modified source.<sup>1 2 3 4 5 6</sup> Under this historical EPA policy a facility may rebut the presumption that a source that is shut down for a period exceeding two years was intended to be shut down permanently by convincingly showing that the shutdown was only intended to be temporary. Under this procedure, EPA must determine if the owner of the facility at the time of the shutdown intended the

---

<sup>1</sup> May 27, 1987 memo from John S. Seitz, Director, Stationary Source Compliance Division, Office of Air Quality Planning and Standards, to David P. Howekamp, EPA Region IX concerning restart of the Noranda Lakeshore Mines' roaster leach acid plan, found at [http://www.epa.gov/ttn/nsr/psd1/p3\\_27.html](http://www.epa.gov/ttn/nsr/psd1/p3_27.html)

<sup>2</sup> October 3, 1980 memo from Director, EPA Division of Stationary Source Enforcement to Sandra S. Gardebring, Director, EPA Region V Enforcement Division, found at [http://www.epa.gov/ttn/nsr/psd1/p3\\_15.html](http://www.epa.gov/ttn/nsr/psd1/p3_15.html)

<sup>3</sup> June 18, 1980 memo of telephone conversation between Roger Pfaff and Rich Biondi, found at [http://www.epa.gov/ttn/nsr/psd1/p3\\_13.html](http://www.epa.gov/ttn/nsr/psd1/p3_13.html)

<sup>4</sup> July 31, 1981 memo from Thomas W. Devine, Director of Air and Hazardous Materials Division to State and Local Air Directors, found at [http://www.epa.gov/ttn/nsr/psd1/p2\\_18.html](http://www.epa.gov/ttn/nsr/psd1/p2_18.html)

<sup>5</sup> November 19, 1991 memo from John B. Rasnic, Director, Stationary Source Compliance Division, Office of Air Quality Planning and Standards to Douglas M Skie, Chief, Air Programs Branch, found at <http://www.epa.gov/ttn/nsr/gen/memo-h.html>

<sup>6</sup> August 8, 1980 memo from Edward E. Reich, Director, Stationary Source Enforcement Division to William K. Sawyer, General Enforcement Branch, Region II, found at [http://www.epa.gov/ttn/nsr/psd1/p3\\_14.html](http://www.epa.gov/ttn/nsr/psd1/p3_14.html)

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 4**

---

shutdown to be permanent. EPA must also evaluate the level of maintenance and staffing that a facility received during the shutdown, and such factors as whether the plant must be subjected to a major investment effort in order to begin a restart.

5. In the present case, the Monroe Power Plant was owned by the Monroe Utilities Commission at the time of the shutdown, which the Louisiana Department of Environmental Quality file indicates as being in December, 1987. A review of available materials indicates that the plant was owned by the Monroe Utilities Commission at the time of the shutdown since the plant, along with all other aspects of the Monroe Utilities Commission infrastructure, was not sold to Louisiana Power and Light (a predecessor of the applicant, Entergy Louisiana) until August 3, 1992 (See Exhibit #1, an Act of Sale by the City of Monroe to Louisiana Power and Light company, dated August 3, 1992).

6. At the time of the shutdown, it can reasonably assumed that the Monroe Utilities Commission had intended to permanently leave the electric utility business as its was subsequently negotiating a sale of the entire electric system. At this writing, petitioners are attempting to gain access to the documents mentioned in the preamble language on page 1 of the “act of sale” (see Exhibit #1), and we reserve the right to supplement and amend this petition in the future with further articulation on the Monroe Utilities Commission’s intent and any owner-management services aspects of the relationship between the Monroe Utilities Commission and Louisiana Power and Light at the time of the December, 1987 shutdown.

7. Also at the time of the shutdown, it can also be reasonably assumed that Entergy Louisiana’s predecessor, Louisiana Power and Light, was interested in ensuring that the

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 5**

---

Monroe Utilities Commission exited the electric utility business to open market share for its company and to ensure that the Monroe Utilities Commission would not be an electric utility competitor in the future.

8. An April 9, 1986 memo from Paul Laird, Environmental Program Specialist, to John R. Newton, LDEQ Regional Program Manager indicates:

“Mr. Littlefield [Louisiana Power and Light Company] told me that the plant is scheduled to go on stand by this summer. This is a result of the installation of a new line connecting L.P.&L.’s Sterlington Station to the Monroe area.”

As such, it would seem clear the Louisiana Power and Light intended to meet electric power needs in the Monroe area through another more efficient power plant it operated through means of the new transmission line and that the Monroe Plant was no longer needed.

9. A February 24, 1988 memo from Paul Laird, Environmental Quality Coordinator, Northeast Regional Office to John R. Newton, Program Manager, Air Quality Division indicates a company intent:

“Mr. Littlefield stated that the plant has not been in operation for thirteen months, the plant is scheduled to be ‘mothballed’ in the next six months. Mr. Littlefield indicated that he plans to retire at that time and Mr. Terral will probably be the plant contact at that time.”

10. A February 8, 1989 a memo from Paul Laird, LDEQ northeast Regional Office, to John R. Newton, Surveillance Program Manager, Air Quality Division, indicates receipt of a letter from Louisiana Power and Light in March, 1988 with an indication “...letter stated that the plant had been retired from service on December 31, 1987.”

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 6**

---

11. A July 12, 1991 memo from L. C. Ingles Jr., LDEQ Northeast Regional Office Air Quality Division to J. Paul Laird, Environmental Quality Coordinator, Northeast Regional Office reports on a conversation with Ray Smith, Maintenance Superintendent for Louisiana Power and Light:

“He indicated that LP&L was presently looking at putting *one* of the generators at the Monroe plant back into operation, possibly in 1994. Since the plant has not operated for some time and *there are no definite plans for future operation*, I did not draft a letter to the company. Mr. Smith stated that if the plant does resume operation, our office would be notified.” (Emphasis supplied)

12. Reports found in the LDEQ Northeast Region file indicate that no employees were present at the Monroe Plant during attempts to do inspections on July 22, 1997, September 8, 1995, August 9, 1993, August 10, 1994 and July 23, 1992. This information contradicts previous company claims made to LDEQ staff in March, 1987 that they are “maintaining a staff of fifteen people on site.”

13. Although the Monroe Power Plant is listed as of 1996 in the LDEQ emission inventory, it is shown with zero emissions (See Exhibit #2); we reserve the right to amend and revised our petition in the event we discover that information indicating that operation of the Monroe Plant would result in emissions not anticipated in any regional Louisiana NOX emission reduction plan.

14. Available information indicates that the plant spend significant financial resources before it can be reliably restarted. Some reports indicate that Entergy Louisiana may

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 7**

---

have allocated as much as a \$6 million budget in immediately needed repairs in order to restart the plant<sup>7</sup>.

15. Under its policies, EPA must assume this plant is subject to PSD applicability upon a restart after at least 11 years of inactivity in the absence of a convincing demonstration that the Monroe Utilities Commission, the owner of the plant at the time of shutdown, or its agent, Louisiana Power and Light, intended to again operate the plant and that the shutdown was only temporary. At the present time, no such demonstration appears to have been made to U.S. EPA Region VI<sup>8</sup>. The proposed Clean Air Act Title V permit that LDEQ proposes to issue to Entergy Louisiana would, in part, grant a permit shield to Entergy Louisiana on the matter of Prevention of Significant Deterioration compliance. As such, this proposed permit shield would interfere with any potential enforcement action that EPA might choose to bring as a result of any failure by U.S. EPA Region VI to subject the Entergy Louisiana Monroe Power Plant to PSD and/or NSPS review. As a result CCAW petitions the EPA Region VI Administrator to file comments with LDEQ to disallow the granting of the proposed Title V operating permit to Entergy Louisiana until such time as the restart of the Monroe Power Plant is subjected to PSD review by U.S. EPA and LDEQ. In addition, CCAW seeks a determination as to whether any modifications made to the Monroe Power Plant either now, in the past back to 1975, or planned at any time in the near future (in association with the restart) rise to the level of modifications that would trigger a review for compliance with requirements on

---

<sup>7</sup> Personal conversation between Nathan Roberts, Entergy Louisiana, and Merrijane Yerger, CCAW, on January 26, 1999.

<sup>8</sup> Personal conversation between Rick Barrett, EPA Region VI, and Merrijane Yerger, January, 1999.

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 8**

---

modifications for steam electric power plants under EPA’s New Source Performance Standard (NSPS) rules.

**THE ADMINISTRATIVE RECORD CONTAINS INDICATIONS IN THE FILE THAT THE MAXIMUM CAPACITY OF THE MONROE PLANT MAY HAVE BEEN INCREASED BY SOME UNKNOWN METHOD AT SOME TIME BETWEEN 1976 AND THE TIME OF THE TITLE V APPLICATION WITHOUT BEING SUBJECT TO PSD AND NSPS REVIEWS**

16. The Monroe Power Plant has been considered a “grandfathered” source under Louisiana Department of Environmental Quality rules. The plant has never been subjected to new or modified source review under PSD or NSPS as near as can be determined from the administrative record in the LDEQ Northeastern Office.

17. The September, 1996 Entergy Louisiana Title V permit application indicates the following heat input capacities for the Monroe Power Plant units in question:

Unit 10	Unit 11	Unit 12	Total
473 MMBtu/hr	562 MMBtu/hr	926 MMBtu/hr	1961 MMBtu/hr

18. However, an attachment to an April 27, 1976 Compliance Statement (Attached as Exhibit #3) of the Monroe Utilities Commission indicates maximum heat input rates as show below:

Unit 10	Unit 11	Unit 12	Total
256 MMBtu/hr	376 MMBtu/hr	733 MMBtu/hr	1365 MMBtu/hr

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 9**

---

An August 6, 1981 memo by Paul Laird, Air Quality Division, LDEQ, cites these same numbers as the heat input capacity for these units..

19. As such, the maximum heat rate for all three units combined as portrayed in the September 1996 permit application is about 144% of the heat rates specified by Monroe Utilities Commission in April 27, 1976 and accepted in a 1981 memo by the Louisiana Department of Environmental Quality.. No explanation exists in the Northeast Regional Office file to explain this discrepancy, which would likely have a significant effect on increasing all maximum criteria pollutant mass emission rates over historical emissions that occurred when the plant was still operating prior to December, 1987.

**THE PROPOSED TITLE V OPERATING PERMIT DOESN'T INCORPORATE SHORT TERM MASS RATE EMISSION LIMITATIONS; AS SUCH, LITTLE IN THE PERMIT ENSURES CONTINUOUS COMPLIANCE WITH REQUIREMENTS TO MAINTAIN NATIONAL AMBIENT AIR QUALITY STANDARDS**

20. Provisions at 42 U.S.C §7410(a)(1) in the Clean Air Act require that facilities permitted under the act ensure that maintenance of ambient air quality standards is required. Under 42 U.S.C. §7410(a)(2)(A) and 42 U.S.C. §7661c(a), state implementation plans and Title V operating permits must include “enforceable emission limitations” that will ensure maintenance of national ambient air quality standards under the Act.

21. An air quality modeling report attached to the proposed Title V permit for the Monroe Power Plant only demonstrates compliance with the National Ambient Air Quality Standard for annual average exposure to nitrogen oxides. No report has been

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 10**

---

provided in the public release document that shows that emission limitations contained in the permit will ensure compliance other National Ambient Air Quality Standards.

22. Of particular concern are transient emissions of sulfur dioxide associated with burning oil in the three units. A data sheet attached to the proposed permit indicates that the three units may discharge a maximum total of 1026 lbs per hour of sulfur dioxide under certain conditions. No such short term, pound per hour mass rate emission limitation is contained in the permit itself in clearly unambiguous, legally enforceable language. No requirement in the permit is imposed on the maximum sulfur content of fuels to be used in the plant, although the application contains mention of 0.5% sulfur content for fuel oil. Although the permit does contain a limit of 15% on the use of number 2 fuel oil of “annual fueling capacity,” this limit clearly allows 100% oil-fired operation of the plant during certain times.

23. Plant emissions are discharged through relatively short stacks. The Title V application does not provide information about building height in order to determine the potential for these short stacks to cause building-related aerodynamic downwash. The stack heights are:

Unit 10	Unit 11	Unit 12
55 ft	76 ft	80 ft

24. For emissions prior to the effective date of the facility’s acid rain permit, there is conflicting information for annual sulfur dioxide emissions between the application (one table shows annual sulfur dioxide emissions at 4501.52 tons per year) and the public notice (shows 679.84 tons per year).

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 11**

---

25. U.S. EPA Region VI should insist that the permit be amended to clearly require unambiguous one hour maximum emission rates for sulfur dioxide and other criteria pollutants in legally enforceable language in the body of the Title V permit. These emissions limitations should be enforceable by continuous emission monitoring on the plant's stacks. The facility should be subjected to a maximum sulfur content in oil limitation and mandatory testing requirements.

26. U.S. EPA Region VI should publish the results of dispersion modeling which shows that the operations of this source at the maximum permissible mass rate of emissions will not jeopardize maintenance of National Ambient Air Quality Standards for all criteria pollutants, particularly for sulfur dioxide during 100% oil-fired operation.

**ISSUANCE OF THE PROPOSED PERMIT APPEARS TO COUNTENANCE CHANGES IN THE METHOD OF OPERATION OF THE MONROE POWER PLANT AND SUBSEQUENT ANNUAL EMISSION INCREASES THAT ARE SUGGESTIVE OF THE POTENTIAL TRIGGERING OF PSD REVIEW FOR SULFUR DIOXIDE**

27. Review of the Entergy Louisiana Title V application indicates that the facility is intended to burn both natural gas and #2 fuel oil. The proposed permit indicates that # 2 fuel oil burning is acceptable for up to 15% of the "annual fueling capacity" of the plant. There is no apparent ban or restriction on other kinds of oil, such as residual oil or other distillate fuels.

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 12**

---

28. Notwithstanding Entergy Louisiana’s application, other available information potentially indicates that historical operating patterns were significantly different from the oil burning provisions contained in the Title V application and proposed permit.

29. The previously referenced 1976 compliance statement by the Monroe Utilities Commission (See Exhibit #3) indicates maximum emission rates of 0.15 lb/hr, 0.22 lb/hr and 0.01 lb/hr sulfur dioxide emissions from units 10, 11 and 12, respectively. The same document indicates 1975 sulfur dioxide emissions of 7.08 tons. This compares to maximum emissions of 247.93 lbs/hour, 294.52 lbs/hr and 485.3 lbs/hr for units 10, 11 and 12, respectively, in the Title V attachment.

30. The most recent emission inventory information from the time the plant was still operating indicates the following emissions:

Year	NOX	SO2	CO	PM	VOC	
84	1,096	19	27	16	2	tons
85	753	2	67	9	2	
86	745	10	54	7	1	
87	1	0	0	0	0	

As such, the proposed Title V operating permit appears to authorize a very large increase in the permissible annual sulfur dioxide, nitrogen oxide and carbon monoxide emissions. Although some of this increase can be accounted for by less than 8760 hours of operation in the years immediately preceding shutdown, this cannot account for all of the expected increase, particularly for sulfur dioxide.

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 13**

---

31. Although there is reference in the file to 1975 use of 11,570 barrels of oil and 1979 use of 4000 barrels of oil, an August 6, 1981 memo by Paul Laird, LDEQ Air Quality Division reports on an inspection showing operation at 100% natural gas with statements alleging that no diesel fuel was used “in the past several months.” A March 2, 1982 memo by Paul Laird indicates that company officials “did not anticipate the burning of diesel at the plant in the near future and any that might be burned would be low in sulfur.” The Laird memo also stated in regard to units #10 and #11 that “...as long as they are operated on a high percentage of natural gas there would be no emission problems from these sources.” A March 31, 1983 memo by Laird indicated a company official’s statement “...that a mixture of 70% natural gas and 30% diesel fuel had been burned in the units for a few hours on two days in January. He did not anticipate that diesel fuel would be burned in the near future.”

32. A June 18, 1994 memo from L.C. Ingles, Air Quality Specialist to John R. Newton, Regional Program Manager at LDEQ indicates:

“Mr. Littlefield stated that during extremely cold weather in December, 1983, the company that supplies natural gas to the plant curtailed that supply on short notice, and they were forced to burn 100% load sulfur diesel fuel for approximately four days. He indicated that this caused a few problems and some visual emissions due to the fact that the plant ***had never operated on 100% fuel oil.*** However, he stated that within a short time the problems were corrected and the ***visible emissions were reduced to an acceptable level.*** Mr. Littlefield stated that the appropriate authorities were notified at the time these problems were experienced. He did not anticipate that diesel fuel would be burned in the near future.” (Emphasis added)

33. A February 20, 1985 memo from John R. Newton, LDEQ Regional Program Manager to Thomas C. Goerver, Program Manager, Surveillance, indicates:

“Mr. Littlefield indicated that the units had operated on natural gas during the past year except for part of one day. They were curtailed on natural gas supply and

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 14**

---

burned low sulfur fuel oil (.21% sulfur for a few hours). I discussed 17.11 with Mr. Littlefield. *They had had some short duration emission problems in the past when they changed fuels from natural gas to fuel oil.*“ (Emphasis added)

34. An April 9, 1986 memo from Paul Laird, Environmental Program Specialist, to John R. Newton, LDEQ Regional Program Manager indicates company official statements:

“The units have operated on natural gas during the past year. *No fuel oil was burned at this plant.*” (Emphasis added)

35. The above factual exposition indicates that, although the plant has apparently burned fuel oil in the past, its actual pattern of doing so indicates that fuel oil cannot be considered a technically demonstrated, reliable fuel at this site utilizing the existing equipment presently in place. When burning 100% fuel oil, the company has apparently had significant air quality problems and visible emissions. Because of these problems, the company’s use of fuel oil declined to zero in the most recent closing years of operation of the facility.

36 EPA’s Prevention of Significant Deterioration regulations provide that PSD applicability will apply to major modifications, which are defined as:

“Major modification’ means any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.....”  
“.... A physical change or change in the method of operation shall not include..... use of an alternate fuel or raw material by a stationary source which....the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was

**Citizen Petition Concerning a Proposed Title V Operating Permit for the Entergy Louisiana Monroe Power Plant, Page 15**

---

established after January 6, 1975 pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR subpart I or 40 CFR 51.166...”<sup>9</sup>

In the present case, the proposed Title V permit would authorize a sulfur dioxide emission increase that was significant compared to historical emissions when the plant was operating. It would do so by allowing up to 15% of the fuels for the facility to be sulfur bearing fuel oil up to 0.5% sulfur (provided this was actually enforceable), which is over twice as high as any previous mention of fuel oil sulfur content in the file..

Although fuel oil was likely burned in 1975, there is credible evidence that the equipment on site was not capable of doing so at times without violating visible emission requirements. As such, Entergy Louisiana should not be allowed to evade PSD review for sulfur dioxide under 40 CFR §52.21(b)(2)(iii)(e)(1). The restart of the facility should, at a minimum, be required to conduct a BACT demonstration for sulfur dioxide and an air quality analysis for ambient sulfur dioxide PSD increment consumption.

---

<sup>9</sup> See 40 CFR §52.21(b)(2)(i) and (iii)(e)(1)

**ENERGY LOUISIANA’S TITLE V PERMIT APPLICATION INDICATES PRACTICES IN THE DISPOSAL OF BOILER CLEANING MATERIALS THAT RAISE QUESTIONS ABOUT RCRA COMPLIANCE**

37. Entergy Louisiana’s Title V permit application contains reference to two different procedures to boiler cleaning to remove iron oxide and copper from the boilers. One procedure involves use of up to 30,000 pounds of Ethylenediaminetetraacetic acid. Spent boiler cleaning solutions containing this chemical and scavaged metals are injected into the boiler for combustion/evaporation. Entergy Louisiana provides neither detailed analysis of typical spent boiler cleaning solutions nor citation to any regulatory provisions that would exempt boiler cleaning solutions from Resource Conservation and Recovery Act regulations concerning hazardous waste disposal. If spent boiler cleaning solutions exhibit RCRA hazardous waste characteristics, disposal at this site would be prohibited unless the facility obtained a Part B permit as a hazardous waste treatment, storage and disposal facility, became regulated under EPA’s Boiler and Industrial Furnace regulation or otherwise demonstrated conclusively that the spent boiler cleaning solutions complied with EPA’s recent “comparable fuels” specification. No details have been provided on any of these matters and the public ought to have the ability to comment knowledgeably on any such practices.

**REQUEST FOR EPA REGION VI TO PROVIDE FOR MANDATORY  
DISCLOSURE OF PERTINENT INFORMATION FROM BOTH ENTERGY  
LOUISIANA AND THE MONROE UTILITIES COMMISSION (OR ITS  
SUCCESSORS); AND A REQUEST FOR EPA REGION VI TO CONDUCT AN  
ON SITE INSPECTION AND RECORDS REVIEW AT THE MONROE POWER  
PLANT SITE**

38. CCAW petitions EPA Region V to issue a request to both Entergy Louisiana and the City of Monroe pursuant to its authority under 42 U.S.C. §7414 for mandatory disclosure of all information necessary for EPA Region 6 to conduct a review of all matters raised by this petition. Such a mandatory information disclosure request might include all items listed in Exhibit #4, which was recently used by EPA Region V in a similar case of a restart of a long closed facility (Detroit Edison Connors Creek Plant).

39. In addition, CCAW requests an onsite inspection by U.S. EPA Region VI in order to determine an inventory of all physical changes and changes to methods of operation which have occurred, and will occur, at this site which are pertinent to increases in emissions or the triggering of modification provisions of PSD and NSPS regulations.

Respectfully submitted,

---

Merrijane Yerger  
Managing Director  
Citizens for Clean Air & Water  
605 Park Ave.  
Monroe LA 71201  
(318) 322-5163  
(318) 387 1440 FAX

---

Alexander J. Sagady  
Environmental Consultant to CCAW  
A. J. Sagady & Associates  
PO Box 39  
East Lansing, MI 48826-0039  
(517) 332-6971  
(517) 332-8987 FAX