



Tennessee Valley Authority, 1499 Steam Plant Road, Gallatin, Tennessee 37066

June 23, 2016

Ms. Michelle Owenby, Director
Division of Air Pollution Control
Tennessee Department of Environment
and Conservation
William R. Snodgrass TN Tower
312 Rosa L Parks Avenue, 15th Floor
Nashville, Tennessee 37243

Dear Ms. Owenby:

TENNESSEE VALLEY AUTHORITY (TVA) – GALLATIN FOSSIL PLANT (GAF) – SOURCE
NUMBER: 83-0025 – REVISION TO REQUESTED SO₂ LIMIT

On December 28, 2015, TVA submitted an application for a construction permit proposing an SO₂ emission limit of 2,236 lbs/hr (30-day rolling average) for GAF Units 1-4. This limit was based on TVA's 1-hour SO₂ NAAQS modeling and an analysis of emissions data variability. After reviewing the modeling approach submitted with the application, the Division and the U.S. EPA requested changes to the approach, including:

- Use of GEP stack height instead of actual stack height
- Use of a different ambient monitoring location to determine background concentration
- A more conservative allocation of emissions among the four units
- Additional modeling analysis at lower unit loads.

The report describing the revised modeling analysis and results was submitted to the Division via email on June 23. Based on these results TVA proposes an SO₂ emission limit for total mass emitted from GAF Units 1-4 of 1,971 lbs/hr based on a 30-operating-day-rolling average, excluding emissions during startup, shutdown and malfunction. Compliance will be demonstrated by the continuous emissions monitoring systems for SO₂ currently required under the GAF Title V permit.

If you have any questions, please contact Tom Waddell in Chattanooga at 423-751-2005.

Sincerely,

A handwritten signature in blue ink that reads 'Clay C. Cherry'.

Clay C. Cherry
Plant Manager
Gallatin Fossil Plant