From: Thane Jennings
To: AQFeb2011Rules
Subject: PM2.5 Baseline & GHG Baseline
Date: Friday, December 17, 2010 9:48:48 AM

We would prefer that the baseline values for new pollutants (PM2.5 & GHG) be set in proportion to pollutants that have already gone through the PSD process. So if the PM10 netting basis was set at 200 tons based on 8,760 hours of operation at 100% firing with 200 starts the PM2.5 basis would be set at 200 tons also. The same process could be used for GHGs, the amount of GHGs could be easily calculated for combustion sources using ODEQ approved emission factors and the fuel usage used to set the netting baseline. For example if the original PSD analysis used 8,760 hours at max firing rate, the CH4 baseline could be calculated in the following way.

8,760 hrs x 4,000 MMbtu/hr x 0.001 kg CH4/MMbtu x 0.001 metric ton/Kg CH4 = 35 tons CH4

Thank you for your consideration.

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