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1	ITEM #	SOURCE		DESCRIPTION	FILE NO.	FACILITY	RESPONSIBILITY		DATE ADDED	DUE DATE	DUE DATE	COMPL DATE	STATUS
2		DOC/MTNG	DATE				CO.	INITIAL					
3	33	--	11/8/10	Prepare Data Request for Brown Station.	41.0100	Brown	B&V	TH	11/08/10	11/18/10		11/19/10	Complete
4	37	Brown KO Mtg	#####	Provide drawings of the Unit 3 SO3 mitigation project	14.1000	Brown	LG&E/KU	ES	11/15/10	11/19/10		11/11/10	Complete
5	25	Email 22.1000	#####	Provide LG&E and KU comments on Ghent Project Des	22.1000	Ghent	LG&E/KU	ES	10/21/10	10/28/10		11/08/10	Complete
6	23	Conf Call 1010	#####	Provide draft of Mill Creek Validation Report for LG&E/K	41.0803	Mill Creek	B&V	TH/MW	10/19/10	11/05/10		11/05/10	Complete
7	29	--	#####	Provide Brown Kickoff presentation .	14.1000	Brown	B&V	TH	10/29/10	11/05/10		11/03/10	Complete
8	24	Conf Call 1010	#####	Prepare differences between SCR and SNCR for Browr	14.1000	Brown	B&V	AM/RL	10/19/10	11/09/10		11/03/10	Complete
9	28	--	#####	Provide Mill Creek Validation presentation.	41.0803	Mill Creek	B&V	TH	10/29/10	11/05/10		11/03/10	Complete
10	31	Email 14.1000	#####	Provide comments on Brown Kickoff meeting agenda	14.1000	Brown	LG&E/KU	ES	10/27/10	11/02/10		11/01/10	Complete
11	30	Email 14.1000	#####	Provide comments on Mill Creek Validation meeting age	14.1000	Mill Creek	LG&E/KU	ES	10/27/10	11/02/10		11/01/10	Complete
12	26	--	#####	Provide sketches of Unit 4 AQC equipment in the thicke	41.0402	Mill Creek	B&V	MH	10/25/10	10/27/10	10/27/10	11/01/10	Complete
13	22	Email 14.1000	#####	Provide LG&E/KU comments on Ghent Site Visit meeti	14.1000	Ghent	LG&E/KU	ES	10/15/10	10/19/10		10/22/10	Complete
14	11	KO & MC Site \	9/20/10	Evaluate pros and cons of NID system for November tec	14.1000	n--	B&V	AM/RL	09/21/10	Nov. 2010		10/21/10	Complete
15	21	Ghent Site Visit	#####	Prepare Ghent Information Request.	41.0100	Ghent	B&V	TH	10/11/10	10/15/10		10/18/10	Complete
16	15	KO & MC Site \	9/20/10	Review B&V electrical study conducted in the 1990s	14.1000	Mill Creek	B&V	JB	09/21/10	09/24/10	TBD	10/18/10	Complete
17	18	Email 41.0100	9/29/10	Choose the coal fuel design basis for Mill Creek, Ghent.	41.0100	n--	LG&E/KU	ES	09/30/10	10/06/10		10/18/10	Complete
18	4	KO & MC Site \	9/20/10	Use B&V file system to set up LG&E/KU document stor	14.1000	n--	LG&E/KU	ES	09/21/10	TBD		10/18/10	Complete
19	12	KO & MC Site \	9/20/10	Schedule vendors for evaluation of existing scrubbers	14.1000	n--	LG&E/KU	ES	09/21/10	TBD		10/18/10	Complete
20	1	KO & MC Site \	9/20/10	Determine location for Mill Creek Task 6 Technology Se	14.1000	Mill Creek	LG&E/KU	ES	09/21/10	10/15/10		10/12/10	Complete
21	20	Email 22.1000	10/5/10	Provide comments on the Mill Creek Project Design Mel	22.1000	Mill Creek	LG&E/KU	ES	10/11/10	10/12/10		10/12/10	Complete
22	13	KO & MC Site \	9/20/10	Provide structural steel study assessments	14.1000	n--	LG&E/KU	ES	09/21/10	09/24/10	09/30/10	10/04/10	Complete
23	14	KO & MC Site \	9/20/10	Provide minimum access dimension box	14.1000	n--	LG&E/KU	ES	09/21/10	09/24/10	09/30/10	10/04/10	Complete
24	7	KO & MC Site \	9/20/10	Determine personnel assignments for document review	14.1000	n--	LG&E/KU	ES	09/21/10	TBD		10/04/10	Complete

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8	To be included in Brown KO presentation. Also include fabric filter discussion. (10/25)									
9	Final sent on 11/5									
10										
11	Confirmed LG&E and KU team is available for the afternoon on 11/9									
12										
13	Eileen has no comments (10/18). Waiting for comments from LG&E/KU members.									
14	Will send powerpoint presentation in the next couple of days (10/18).									
15										
16	B&V could not locate study. Added to Data Request. Will review when LG&E/KU provides study.									
17	Use future coal. (10/11) Chlorine needs to be corrected (10/18)									
18	Audrey is working on it (10/11). It is set up. Eileen to review (10/18).									
19	To be scheduled week of 10/25. B&V requested to be included in debriefing w/ each vendor.									
20	MC Technology selection meeting to be held in Louisville on 11/9 with Brown KO mtg on 11/10&11.									
21	Eileen's comments provided on 10/12. Sent to Alex for further comments.									
22	CD received 9/27. Units 1, 2, and 4 on CD. Unit 3 still needed. Email request sent on 9/28.									
23	CD received 9/27. Access Dimension not included. Email request sent 9/28.									
24	MC - Alex Betz and a couple others at plant. Process in place (10/4)									

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25	19	Re: Email 41.0100	9/30/10	B&V to provide schedule/deadlines for Mill Creek inform	41.0100	Mill Creek	B&V	TH	09/30/10	10/06/10		10/04/10	Complete
26	6	KO & MC Site \	9/20/10	Create IBackup FTP site for large file transfer	14.1000	--	B&V	KL	09/21/10	09/24/10		09/29/10	Complete
27	10	KO & MC Site \	9/20/10	Prepare data inventory and information request	14.1000	Mill Creek	B&V	MW/JC	09/21/10	09/24/10		09/29/10	Complete
28	5	KO & MC Site \	9/20/10	Provide engineering cost estimate at end of each month	14.1000	n--	B&V	TH	09/21/10	09/30/10		09/28/10	Complete
29	2	KO & MC Site \	9/20/10	Determine dates for Ghent kick-off meeting	14.1000	Ghent	LG&E/KU	ES	09/21/10	09/23/10		09/27/10	Complete
30	16	KO & MC Site \	9/20/10	Evaluate the possibility of accelerating the installation of	14.1000	Mill Creek	LG&E/KU	ES &TH	09/21/10	TBD		09/27/10	Complete
31	17	Email 14.1000	9/20/10	Provide LG&E/KU comments on Kick Off Meeting and M	14.1000	--	LG&E/KU	ES	09/21/10	09/24/10		09/24/10	Complete
32	3	KO & MC Site \	9/20/10	Provide DVD copy of Phase I Report	14.1000	--	B&V	TH	09/21/10	09/24/10		09/22/10	Complete
33	9	KO & MC Site \	9/20/10	Update PIM with Eileen's Ghent contact information	14.1000	--	B&V	MW	09/21/10	09/24/10		09/21/10	Complete
34	8	KO & MC Site \	9/20/10	Determine if a Monday, 2 pm EST project conference ca	14.1000	--	B&V	TH/MW	09/21/10	09/23/10		09/21/10	Complete
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28	Sent 9/28.									
29	Scheduled for October 6&7									
30	B&V email addressed the acceleration of the SCR install for MC 1 & 2 (9/17). LG&E/KU replied no change in direction at this time (9/27).									
31	Final issued on 9/24									
32	Set received on 9/22									
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1	LG&E/KU	LG&E and KU		
2	AB	Alex Betz - Mill Creek		
3	DS	Dave Smith - Ghent		
4	ES	Eileen Saunders		
5	GB	Greg Black		
6	GR	Gary Revlett		
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17	BV	Black & Veatch (B&V)		
18	TH	Tim Hillman		
19	KL	Kyle Lucas		
20	AM	Anand Mahabaleshwarker		
21	MK	Mike King		
22	RL	Rick Lausman		
23	MW	M.R. Wehrly		
24	MH	Monty Hintz		
25	JB	Jim Bayless		
26	JC	Jonathan Crabtree		

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**From:** Hillman, Timothy M.  
**To:** Saunders, Eileen  
**CC:** 168908 E.ON-AQC; Jackson, Audrey; Wehrly, M. R.; Lucas, Kyle J.; Mahabaleshwarkar, Anand; Lausman, Rick L.; Hintz, Monty E.; Goodlet, Roger F.; Crabtree, Jonathan D.; Smith, Dave; Mehta, Pratik D.; Bayless, James W. III (Jim); Keltner, Erik J.; King, Michael L. (Mike)  
**Sent:** 10/22/2010 2:42:41 PM  
**Subject:** 168908.14.1000 101022 Ghent - Final Kickoff and Site Visit Meeting Minutes  
**Attachments:** Ghent Kickoff and Site Walkdown Meeting Minutes with Attachments - Final 102210.pdf

Eileen,

Please find attached the final Ghent Kickoff meeting minutes. This final version incorporates E.ON's comment below, and picks up a few additional comments/clarifications from B&V team members.

Best regards,

**Tim Hillman | Project Manager**  
**Power Generation - Environmental Services**  
**Black & Veatch - Building a World of Difference™**  
 11401 Lamar Avenue  
 Overland Park, KS 66211  
 Phone: (913) 458-7928  
 Email: hillmantm@bv.com

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**From:** Saunders, Eileen [mailto:Eileen.Saunders@eon-us.com]  
**Sent:** Friday, October 22, 2010 6:36 AM  
**To:** Hillman, Timothy M.  
**Cc:** 168908 E.ON-AQC; Jackson, Audrey; Wehrly, M. R.; Lucas, Kyle J.; Mahabaleshwarkar, Anand; Lausman, Rick L.; Hintz, Monty E.; Goodlet, Roger F.; Crabtree, Jonathan D.  
**Subject:** RE: 168908.14.1000 101012 Ghent - Draft Kickoff and Site Visit Meeting Minutes

Tim,

The notes look fine with one exception: "James Yocun" should read "James Yocum".

Thanks,

Eileen

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**From:** Hillman, Timothy M. [mailto:HillmanTM@bv.com]  
**Sent:** Tuesday, October 12, 2010 1:53 PM  
**To:** Saunders, Eileen  
**Cc:** 168908 E.ON-AQC; Jackson, Audrey; Wehrly, M. R.; Lucas, Kyle J.; Mahabaleshwarkar, Anand; Lausman, Rick L.; Hintz, Monty E.; Goodlet, Roger F.; Crabtree, Jonathan D.  
**Subject:** 168908.14.1000 101012 Ghent - Draft Kickoff and Site Visit Meeting Minutes

Eileen,

Please find attached draft meeting minutes from the Ghent kickoff. Please provide E.ON's comments by next Tuesday, 10/19.  
 Thanks,

**Tim Hillman | Project Manager**  
**Power Generation - Environmental Services**  
**Black & Veatch - Building a World of Difference™**  
 11401 Lamar Avenue  
 Overland Park, KS 66211  
 Phone: (913) 458-7928  
 Email: hillmantm@bv.com

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**BLACK & VEATCH CORPORATION  
CONFERENCE MEMORANDUM**

E.ON US  
Phase II: Air Quality Control Study  
Ghent Kick-off and Site Visit

B&V Project 168908  
B&V File 14.1000  
October 22, 2010

A kick-off and site walk down meeting was held October 6-7<sup>th</sup> at the Ghent Generating Station for the Phase II: Air Quality Control Study Project.

**Recorded by:** Tim Hillman

Attending:

Ghent Kick-off Meeting, October 6<sup>th</sup>

Eileen Saunders	E.ON
Mike Mooney	E.ON
Gary Revlett	E.ON
James Yocum	KU
Randy Scott	LG&E - KU
Greg Jones	LG&E - KU
Jeff Joyce	KU
Danny Ayler	KU
Troy Bickers	KU
Paul Wright	KU
Mike Drake	KU
Dave Smith	KU
Tim Hillman	B&V
M.R. Wehrly	B&V
Anand Mahabaleshwarkar	B&V
Kyle Lucas	B&V
Rick Lausman	B&V
Monty Hintz	B&V
Roger Goodlet	B&V

The purpose of this meeting was to 1) present the project scope and Phase I study results to the Ghent facility personnel, and 2) provide for a site visit and walk down of the Ghent facility. The above attendance list reflects those attending the initial kick-off meeting at Ghent. (Agenda and Attendance Roster attached herein for reference).

**MEETING DISCUSSION**

**Day 1, October 6, 2010**

The kick-off meeting began at 9 am at Ghent.

1. Eileen began the meeting with introductions and a brief summary of the project scope. E.ON requested B&V to prepare a data request with priority dates similar to that developed for Mill Creek. (Action Item #1)
2. E.ON (Gary Revlett) provided a review of all the regulations and environmental controls that are driving the capital projects. (Presentation attached herein for reference).
  - NAAQS
  - Clean Air Transport Rule - CATR

## CONFERENCE MEMORANDUM

Page 2

E.ON US  
Ghent Kick-off and Site Visit

B&V Project 168908  
October 22, 2010

- Electric Generating Unit Maximum Achievable Control Technology - EGU MACT
3. The change from annual average to a one (1) hour limit for NAAQS causes the biggest issues; even the diesel fired units may have issues on the site. The impact of one hour limits will be based on monitoring of stack emissions coupled with modeling done for the plume dispersion.
  4. SO<sub>2</sub> should not be a problem for the Ghent units since the existing FGDs basically achieve +98% removal on the units and the modeling shows that they require 96% removal on a plant average.
  5. Compliance dates are very short and the industry has commented that insufficient implementation time is included for CATR Phase 1 in 2012 and Phase 2 in 2014.
  6. CATR is the driving force for Ghent for both SO<sub>2</sub> and NO<sub>x</sub>.
  7. Hg is an issue at Ghent. However, E.ON hopes that with the addition of an SCR on Unit 2, acceptable Hg control may be achieved without additional modifications.
  8. E.ON provided an updated table that can be used as the initial Ghent design basis titled: Estimated Limits & Compliance Dates for Future New Air Requirements Ghent Station". (Attached herein for reference).
  9. E.ON believes Ghent will likely meet the new NAAQS standards because of the existing scrubbers and SCRs.
  10. CATR NO<sub>x</sub> and SO<sub>2</sub> limits are aggressive because allowance modeling for the plant assumed a new SCR on Unit 2. Ghent SO<sub>2</sub> allowances for SO<sub>2</sub> in 2014 are higher for some reason than the 2012 allowances. This maybe an error in the CATR model.
  11. B&V provided a presentation of the Ghent Phase I results and an overview of a PJFF. (Power Point Presentation attached herein for reference). The following general characteristics of a pulse jet fabric filter (PJFF) were discussed.
    - Pressure drop can be 6-8 inches through the PJFF. The increased system pressure drop will require increased ID fan capacity. Upgrade of the existing ID fans, the addition of booster fans, or new replacement ID fans will be required. E.ON emphasized that, if possible, the fans should be located downstream of the PJFF to minimize erosion and damage by dust loading.
    - PJFF bags are normally made of polyphenylene sulfide (PPS) materials, but materials such as fiberglass with a Teflon membrane have been used in specific applications. Temperature constraints on PPS bags are in the range of 380-400 °F continuous operation. Bags woven of fiberglass material can safely be subjected to 500 °F over the short term. The temperature limits require PJFFs to be installed downstream of the air heater.
    - PJFFs are compartmentalized with isolation between compartments to allow online maintenance of bags and compartment equipment.
    - The differences between PJFFs and reverse gas fabric filters were described and discussed.
    - Bag life for a PJFF is typically 3 years by guarantee. The PJFF is harder on the bags during cleaning than a reverse gas fabric filter due to the high, short-duration air pulse used.



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- Dimensions of PJFF vary by manufacturer and are based on gas flow. A “typical” PJFF for a Ghent-sized unit would have an approximately 90 foot x140 foot footprint.
  - An advantage of PJFF installation is that its performance is generally independent of the ash type and is based primarily on flue gas volume. A PJFF could allow burning of PRB coal in the future. This flexibility will be considered in the study.
  - One question to be considered is whether Ghent needs to keep the hot-side ESPs, either for ash scavenging or because the existing SCRs are the low-dust type. B&V noted that a change in catalyst could convert the SCRs to operate in high-dust conditions if the possibility of lower catalyst life is acceptable.
  - The area and facilities for dry ash conversion and ash handling need to be considered with this study. E.ON commented that B&V had previously completed an ash handling study and that the AQC study must be coordinated with the plans developed in the ash handling study.
12. B&V provided an overview of the Phase I study results. Two additional points were also noted and discussed.
- B&V may consider designing the Unit 2 SCR as high-dust units from the onset, allowing deletion of the existing ESPs at Unit 2 if warranted by congestion and construction difficulties.
  - B&V asked if E.ON needs to sell fly ash. Saleable fly ash would require “scalping” of the fly ash upstream of PAC injection and require the retention and use of the existing ESPs. E.ON would like to sell fly ash on an opportunistic basis, but is not necessarily tied to the existing ESPs.
13. EON made the following general comments.
- E.ON wants any new axial fans to be downstream of the PJFFs.
  - E.ON asked B&V to investigate a refined layout for Unit 3 PJFF that would reduce the ductwork runs indicated in the Phase I study.
  - The courtyard area between Units 2 and 3 can be used for siting new equipment. The various maintenance shops on the south side of the courtyard could be relocated. There is no “sacred ground” onsite that must be avoided in locating new facilities. However, retention or re-establishment of the ground level breezeway and the overhead skyway between Units 2 and 3 is desirable.
14. A plant walk down of Units 1-4 was conducted until approximately 3 pm.
15. After the walk down, B&V personnel convened in the Ghent conference room to review preliminary arrangement sketches and begin preparations for the debriefing meeting.
16. Day 1 activities adjourned at approximately 6 pm.

**Day 2, October 7, 2010**

The second day of meetings began at 8 am at Ghent.

17. B&V began Day 2 by preparing some initial sketch arrangements for Units 1-4 in preparation for a site de-briefing scheduled later in the afternoon.
18. At approximately 10 am, B&V resumed site walk downs, splitting into two groups to ground-verify some assumptions made in the initial arrangement sketches.

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19. A site debriefing meeting was convened at 1 pm. The following are the general and unit specific discussions that ensued. (Initial arrangement sketches attached herein).
- General comments:
    - B&V believes it will likely not be feasible to reuse/upgrade the existing ID fans to avoid the addition of new booster or ID fans. Physical constraints on routing duct to and from the existing ID inlet fans is problematic. Locating the PJFFs to protect all of the existing ID fans is not practical in all cases, even for the axial fans at Units 3 and 4. The Unit 3 fans can be incorporated into the revised AQC system, but only in a location that may not be beneficial. B&V fan experts will review this, but new ID fans or booster fans are expected to be required for all units.
  - Unit 1:
    - Sorbent injection will need to be relocated in the duct work to near the inlet of the PJFF. E.ON questioned whether the PJFF vendors would be willing to offer SO<sub>3</sub> guarantees based on sorbent injection. B&V noted that if the vendor is awarded both sorbent injection and the PJFF as a single package he will likely offer some guarantees, but the specific level will have to be negotiated.
    - Concern was expressed with the elevated PJFF for Unit 1 being located close to the Unit 2 cooling tower. B&V will investigate and provide opinions on the overall affect of the new structures on cooling tower performance and level of icing that could result.
    - If the impact to performance warrants it, it was discussed that a couple cells could be added to the east end of the tower to increase the overall tower capacity or allow impacted cells to be taken out of service.
    - Alternate arrangements at Unit 1 appear very limited at this time. E.ON asked about relocating Unit 2's cooling tower to make more room for Unit 1 PJFF. The major issue with that approach is where to relocate the cooling tower. The potential of locating the new cooling tower towards the river or to the east of Unit 1's cooling tower was discussed. Any new construction towards the river, either relocating the Unit 2 cooling tower or the plant reagent piperack, would likely trigger permit concerns with the COE. Building a new tower in the "rock pile" area (formerly the limestone storage area east of the plant) was also discussed. Routing of the underground circulating water lines potentially would be a major issue.
  - Unit 2
    - Because of the high level of congestion in the existing arrangement at Unit 2, plus the need to add a PJFF, B&V considered three alternatives for the SCR location at Unit 2. Two alternatives (Alternates 1 & 3) include split SCR's – two separate reactors, one for each ESP train, with the only difference between the alternatives being the location of the west side SCR.
    - Alternate 1 locates the west SCR in the area just west of the west ID fan and the east SCR above the tower support for the Unit 1 SCR's. The area west of the ID fans appears sufficiently open to allow construction of a tower support for the SCR. The advantage of this arrangement is the short runs of ductwork required, and the SCR reactor box location can be

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reached by a crane set up in the area located immediately south of the abandoned Unit 2 chimney.

- Alternate 3 locates the west SCR along the west side of the Unit 2 boiler structure and the east SCR in the same location as Alternate 1. The approach suggested in the Phase 1 study of locating both split SCRs on the west side of the boiler structure would be problematic because of the difficulty of routing duct work from east side Unit 2 duct to the courtyard and back.
- Alternate 2 is similar to that used for the Unit 1 SCR, with a combined SCR located above the ESPs. However, the area beneath the SCRs in Alternate 2 is very congested, making foundation design and installation extremely difficult. Moreover, the lack of nearby open area adjacent to the SCR locations will limit crane access and greatly complicate constructability. Assuming sufficient free area is found to accommodate the necessary foundations, Alternate 1 is more favorable to construction and the most likely option.
- Low dust SCRs will be assumed for Unit 2 unless elimination of the existing ESPs is warranted for some other reason.
- E.ON has previous studies which propose locating the SCR modules in the courtyard on the west side of the Unit 2 boiler structure. E.ON offered to provide these studies to B&V. B&V will add these studies to the Ghent Information Request.
- The Unit 2 PJFF is assumed to be located north of the existing ESPs and ductwork. A short temporary bypass ductwork can be installed between the airheater outlet duct and the ductwork to the scrubber inlet. This would allow the large section of ductwork located north of the bypass to be demolished and the PJFF installed in its place while Unit 2 is on line. The completed PJFF would be tied into the system during an outage. The new booster or ID fans for Unit 2 (not shown on the arrangement sketches) would tentatively be located at the west (downstream) end of the new PJFF.
- Unit 3
  - The preliminary arrangement sketches show the PJFF location in the courtyard, requiring relocation of the maintenance shop. E.ON has some ideas where the shop could be relocated. As currently configured, new booster or ID fans could be added south of the PJFF without impacting the existing tanks south of the shop.
  - The skyway connecting Units 2 and 3 would need to be temporarily removed while the PJFF is installed. The skyway would then be modified to route around the south side of the PJFF and reconnect to Unit 3. It may also be possible to modify the skyway to provide access from the turbine buildings to the PJFF. To avoid re-routing of the significant amount of interconnecting pipe located in the ground level breezeway between units, the PJFF would be designed to span over this piping and allow the breezeway structure to remain in place, if practical.
- Unit 4

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- The most likely location for the new PJFF is between the existing Unit 4 ESP area and the Unit 3 cooling tower as shown on the sketch. This location avoids the large 96" diameter circulating water pipelines, the water well, and most of the underground utilities in the area.
  - The ID fans currently being installed at Unit 4 would be difficult to incorporate into the proposed ductwork configuration running between the existing ductwork tie in and the new PJFF and back, as shown on the arrangement sketches. A more favorable configuration may be accomplished by locating the new ID fans near the PJFF. The new fans would be sized to replace the current ID fans. New ID fans in this location would allow relatively easy connection directly to the ductwork at the FGD inlet.
  - E.ON asked about wet fans to be located downstream of the scrubber, similar to those used in Europe. B&V explained some of the disadvantages, including materials of construction, maintenance and reliability.
  - E.ON expressed general agreement with the arrangement as discussed for Unit 4. An alternate version of the Unit 4 arrangement sketch was developed to more closely depict the arrangement discussed.
- The debriefing meeting concluded at approximately 2:30.
20. Eileen identified Dave Smith as the Ghent information request point of contact. Dave's contact information is as follows: 502-627-4633 and dave.smith@eon-us.com.
  21. B&V conducted a final walk down to ground-truth some of the comments obtained during the debriefing meeting and review the Unit 1 issues with relocating equipment to allow a more advantageous PJFF location to avoid cooling tower issues.
  22. Plant personnel provided an electronic of an aerial view of the site.
  23. B&V departed Ghent at approximately 4 pm.

**ACTION ITEMS**

#	Description	Responsible	Due Date
1	Prepare Ghent Information Request (complete 10/18/10)	TMH	10/15/10

**ATTACHMENTS**

- Agenda
- Attendance roster
- E.ON Environmental Drivers Presentation and Estimated Limits & Compliance Dates for Future New Air Requirements Ghent Station
- Phase I Results and PJFF PowerPoint Presentation
- Initial arrangement sketches presented during the de-brief meeting

cc: All Attendees  
File

## **AGENDA**

Phase II Air Quality Control Study – Kickoff Meeting and Site Visit

E.ON - Ghent

October 6 - 7, 2010

Location: Ghent Generating Station

### **Day 1, October 6<sup>th</sup>, B&V Arrives 8 am**

- I. Introductions (Starts at 9 am)
- II. Project/Scope Description (E.ON – Eileen S)
- III. Environmental Drivers Presentation (E.ON – Gary R)
- IV. Phase I Study Results/PJFF Overview Presentation (B&V – Rick L and Anand M)
- V. Lunch (on site)
- VI. Begin Escorted Site Walk Down and Data Collection

### **Day 2, October 7<sup>th</sup>, B&V Arrives 8 am**

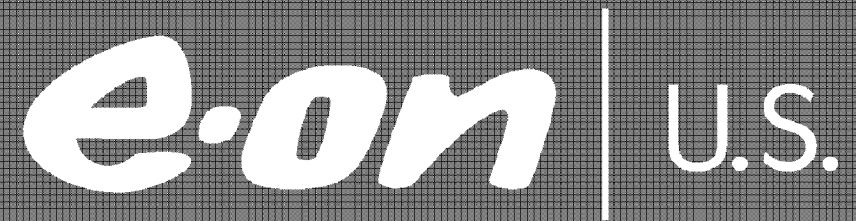
- I. Continue Escorted Site Walk Down and Data Collection
- II. Lunch (on site)
- III. Site Debriefing Meeting
- IV. Additional Walk Down Time if Required
- V. Depart (no later than 4 pm)

## EQU AOC GHENT PLANT KICKOFF

10/6/2010

9:00 A.M.

NAME	COMPANY/POSITION	TELENO.	EMAIL
Tim Hillman	B&V / Proj Mgr	913-458-7928	hillman tm @bv.com
ROGER GOODLET	B&V / CONSTRUCTION	913-458-4134	goodlet rf @bv.com
M.R. WEHRLY	B&V / ENG MGR	913-458-7131	wehrl ymr @bv.com
RICK LAUSMAN	B&V / AQC Eng	913 458-7528	LAUSMAN RL @bv.com
MONTY HINTZ	B&V / CIVIL STRUCT ENGR	913-458-2464	hintzme @bv.com
Anand Mahabaleshwarkar	B&V / AQC	913 458 7736	mahabaleshwarkar @bv.com
Gary Revlett	LGE - KU	502 627 - 4621	gary.revlett@eon-us.com
JAMES YOCUM	KU	502-347-4157	JAMES.YOCUM LG+KU
Randy Scott	LGE - KU	347-4020	Randy.Scott@Eon-US.com
Greg Jones	"	347-4031	Greg.Jones " "
Mike Mooney	LGE/KV	627-3671	Mike.Mooney @eon-us.com
Eileen Sawarders	LGE/ILU	347-4023	Eileen.Sawarders
Jeff Joyce	Kentucky Utilities	347-4001	jeff.joyce
DANNY AYLER	ILU	502-347-4052	DANNY.AYLER@eon-us.com
Troy Bickers	Kentucky UTILITIES	502-347-4057	Troy.bickers @ " " "
Paul Wright	KU	502-347-4003	paul.wright@eon-us.com
Mike Drake	KU	502 347 4002	michael.drake@eon-us.com
Dave Smith	KU	(502)627-4633	dave.smith@eon-us.com

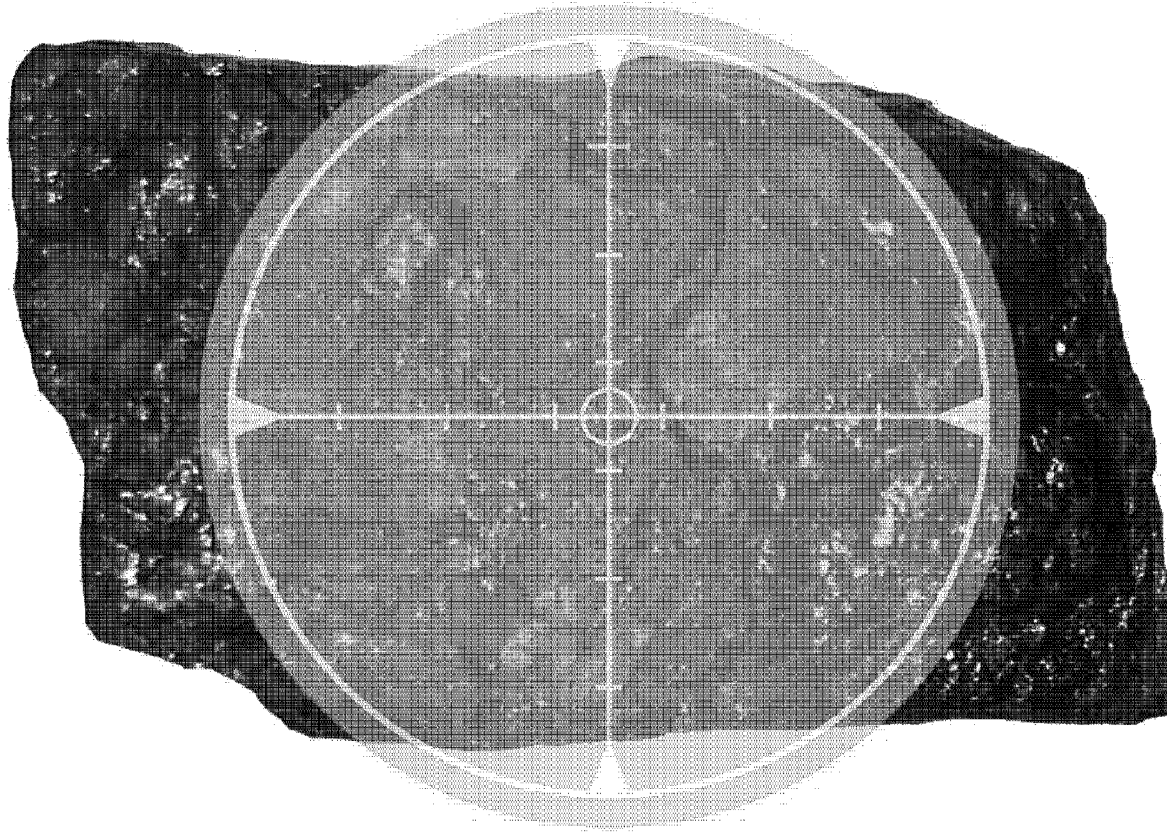


## New EPA Air Regulations

Gary Revlett  
Air Manager, Environmental Affairs



## Coal (Still) in the Crosshairs







## Upcoming Air Related EPA Regulations

- 1. Nitrogen Dioxide National Ambient Air Quality Standard: NO<sub>x</sub> - NAAQS**
- 2. Sulfur Dioxide National Ambient Air Quality Standard: SO<sub>2</sub> - NAAQS**
- 3. Clean Air Interstate Rule (CAIR) Replacement: Clean Air Transport Rule (CATR)**
- 4. Clean Air Mercury Rule (CAMR) Replacement: Electric Generating Unit Maximum Achievable Control Technology (EGU MACT)**

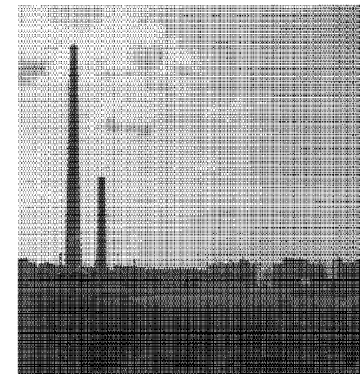


## **New Nitrogen Dioxide National Ambient Air Quality Standard**

- **New 1-hour NO<sub>2</sub> ambient air standard added to the current annual standard.**
- **The new ambient air standard is added to protect public health from short-term exposures.**
- **Sources with the greatest impact are power plants and major highways.**
- **Maximum impact due to short-duration adverse meteorological conditions.**
- **This new regulation is final and compliance is required by 2016.**

### **Potential Company Impact(s):**

- **All coal-fired boilers will need tall stacks (> 400 ft.).**
- **OR**
- **Any coal-fired unit without a tall stack will need a SCR**



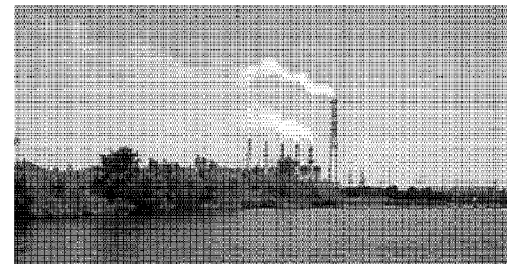


## **New Sulfur Dioxide National Ambient Air Quality Standard**

- **New 1-hour SO<sub>2</sub> ambient air standard added to the current 24-hour standard.**
- **The new ambient air standard is added to protect public health from short-term exposures.**
- **Sources with the greatest impact are coal-fired power plants.**
- **Maximum impact due to short-duration adverse meteorological conditions.**
- **This new regulation is final and compliance is required by end of 2016.**

### **Potential Company Impact(s):**

- **All coal-fired boilers need tall stacks (> 400 ft.) and a FGD with greater than 96% removal efficiency.**
- **OR**
- **Switch to low sulfur fuels**





## **CAIR Replacement – Proposed Clean Air Transport Rule (CATR) for SO<sub>2</sub> and NO<sub>x</sub>**

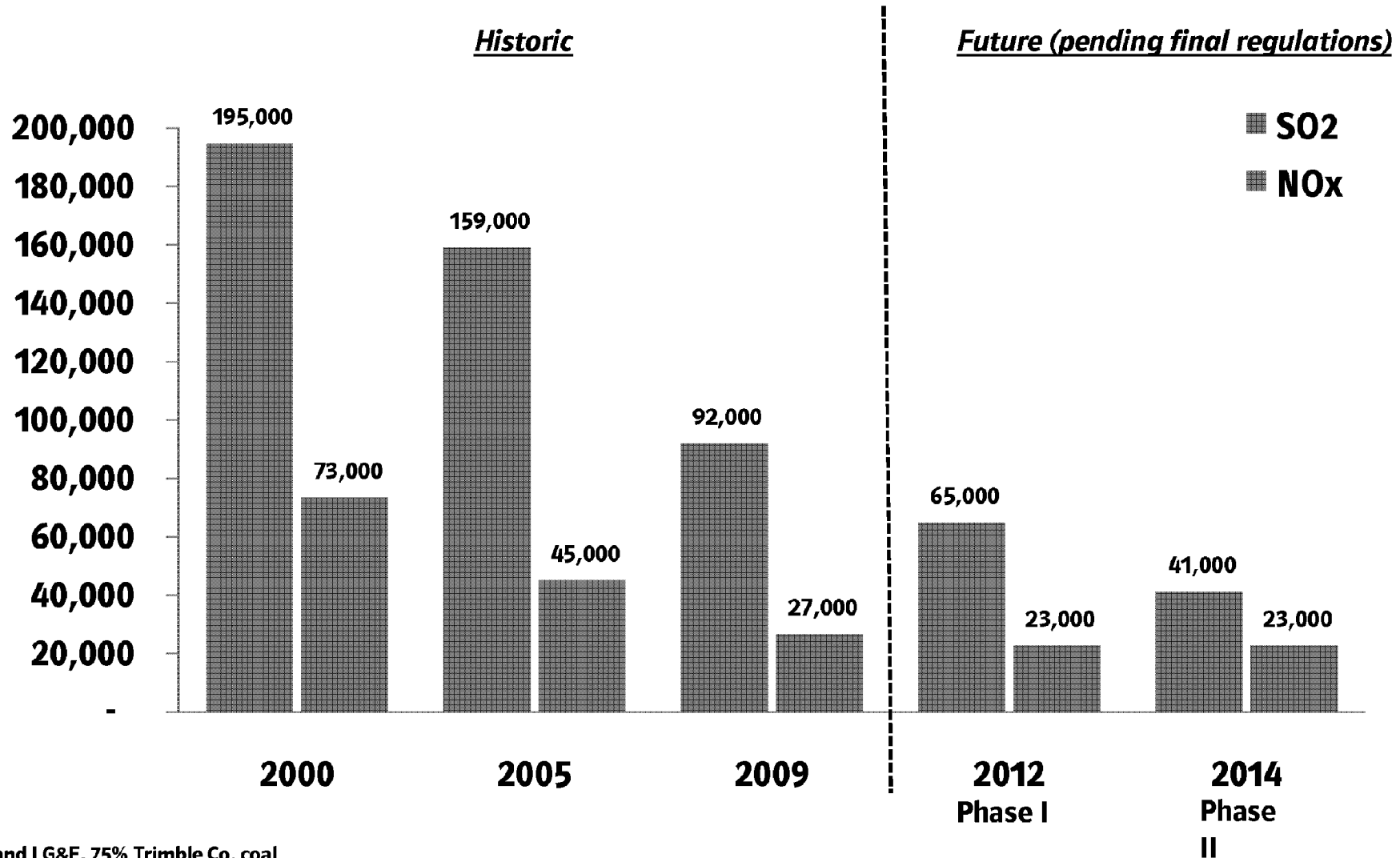
- **Replaces the CAIR cap-and-trade regulations which were vacated in 2008.**
- **The Acid Rain SO<sub>2</sub> cap-and-trade program will remain in place.**
- **100% intrastate trading of SO<sub>2</sub> and NO<sub>x</sub> allowances but limited interstate trading**
- **The new regulations were proposed in July, 2010 and will not be final until June, 2011.**
- **The proposed implementation dates of Phase 1 in 2012 and Phase 2 in 2014 are unrealistic.**

### **Potential Company Impact(s):**

- **With less than 10% interstate trading allowed, utilities in Kentucky need to self comply.**
- **Will require a fleet-wide 20% reduction in NO<sub>x</sub> emissions and more than 50% reduction in SO<sub>2</sub> emissions by 2014.**



# SO<sub>2</sub> and NO<sub>x</sub>: Historic Emissions and CATR Allocations



KU and LG&E, 75% Trimble Co. coal

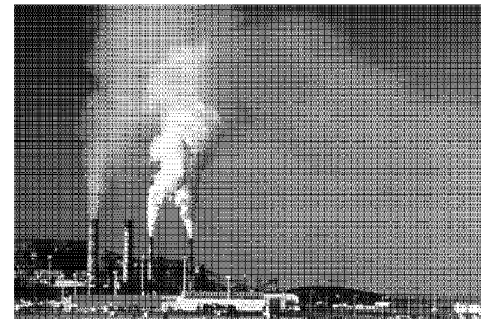


## **CAMR Replacement - Electric Utility Maximum Achievable Control Technology (MACT)**

- **Currently the CAMR replacement has not yet been proposed by EPA.**
- **EPA plans to propose in the new rules in March 2011 and finalize in November 2011.**
- **New emissions limits for Hazardous Air Pollutants such as mercury, hydrogen chloride and hydrogen fluoride and other toxic metals.**
- **No trading of emissions or allowances, each plant must meet the pollutant specific emission limit.**
- **Expected compliance date will be 2015 with a possible 1-year extension.**

### **Potential Company Impact(s):**

- **Most coal-fired units will need to add a baghouse with carbon and lime injection.**

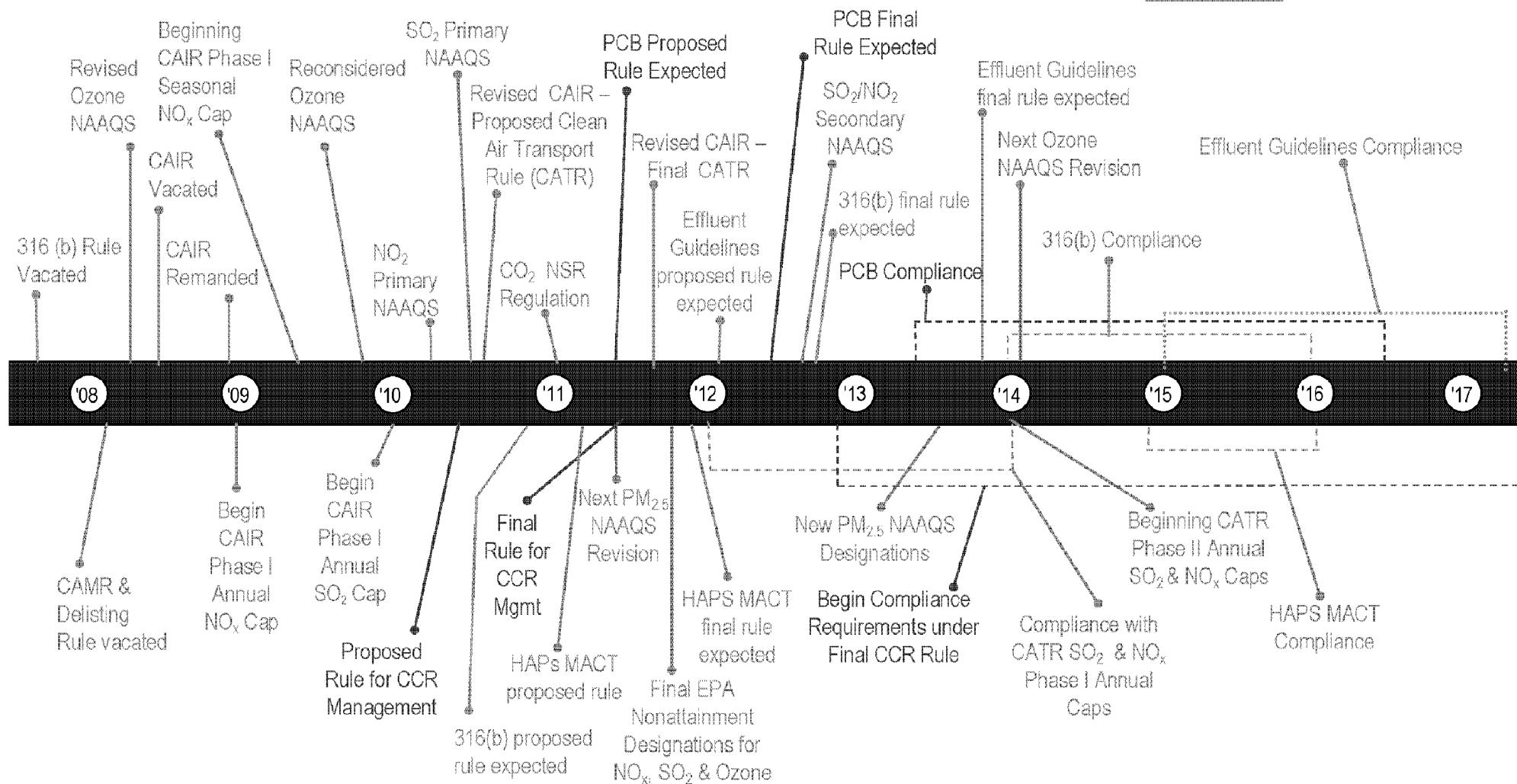




**AIR**

**LAND**

**WATER**



-- adapted from (EPA 2008) Updated August, 2010



## Summary

- **Coal is still, and will continue to be, in the cross-hairs of the EPA.**
- **We will analyze every EPA proposal to determine the full magnitude of its impact, including the financial and operational implications.**
- **As with any proposed environmental regulation, we will continue to follow the developments and act accordingly to achieve full compliance once it takes effect.**
- **It will be necessary for continued coordination between departments and across the lines of business. There will be an increased effort to educate the public and key stakeholders.**





## Estimated Limits & Compliance Dates For Future New Air Requirements

### Ghent Station

Program Name	Regulated Pollutants			Unit/Plant Averaging	Current Reg. Required Date	Forecasted Date for Compliance
	Pollutant	Limit	Units			
SAM NSR NOV	H <sub>2</sub> SO <sub>4</sub>	2 - 10	ppm	Unit	To Be Determined	2012 - 2014
New 1-hour NAAQS for SO <sub>2</sub>	SO <sub>2</sub>	0.31 for plant avg.	lbs/mmBtu	Based on air quality modeling	June, 2017	June, 2016 to June, 2017
New 1-hour NAAQS for NO <sub>x</sub>	NO <sub>x</sub>	0.47 for plant avg.	lbs/mmBtu	Based on air quality modeling	January, 2017	No sooner than January, 2017
CATR	SO <sub>2</sub>	0.186	lbs/mmBtu	Plant, but statewide trading	Beginning Phase I in 2012; Limits in Phase II during 2014	Beginning Phase I in 2013; Limits in Phase II during 2015
	NO <sub>x</sub>	0.041	lbs/mmBtu			
New EGU MACT	Mercury	90% or 0.012	Removal lbs/GWH	Plant	January, 2015, with 1-yr extension - January, 2016	January, 2016, with 1-yr extension - January, 2017 Potential delay for commitment to shutdown older coal-fired units
	Acids (HCl)	0.002	lbs/mmBtu	Unit or Plant		
	Metals (PM) or Metals (As)	0.03	lbs/mmBtu			
	Organics (CO)	0.10	lbs/mmBtu			
	Dioxin/Furan	15 x 10 <sup>-18</sup>	lbs/mmBtu			
PM <sub>2.5</sub> NAAQS	PM <sub>2.5</sub> or Condensable PM	To be determined based on modeling	lbs/hours	Plant	After 2017	After 2017

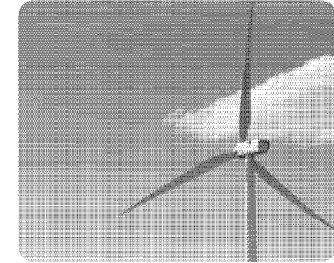
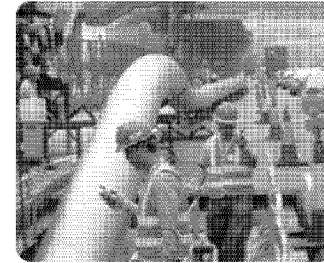
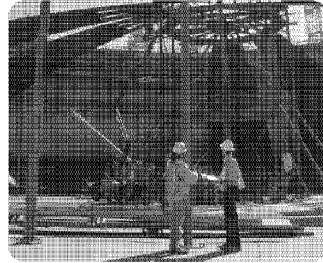


### Evaluation of CATR for Ghent Station

Plant	Unit	2009 Actual Emissions				
		SO <sub>2</sub> (tons)	NO <sub>x</sub> (tons)	mmBtu (year)	SO <sub>2</sub> Rate (lbs/mmBtu)	NO <sub>x</sub> Rate (lbs/mmBtu)
Ghent	1	1,418.1	973.2	31,802,243	0.09	0.06
Ghent	2	5,044.3	2,664.9	24,783,886	0.41	0.22
Ghent	3	3,188.6	1,972.3	34,425,557	0.19	0.11
Ghent	4	1,220.5	802.8	28,668,181	0.09	0.06
<b>Ghent</b>	<b>Total</b>	<b>10,872</b>	<b>6,413</b>	<b>119,679,867</b>	<b>0.182</b>	<b>0.107</b>

Plant	Unit	CATR Allocation Tons			CATR Alternative lb/mmBtu			SO <sub>2</sub> 2012 Heat Input	NO <sub>x</sub> 2012 Heat Input
		SO <sub>2</sub> for 2012	SO <sub>2</sub> for 2014	NO <sub>x</sub> in ≥ 2012	SO <sub>2</sub> for 2012	SO <sub>2</sub> for 2014	NO <sub>x</sub> in ≥ 2012		
Ghent	1	2,221	3,653	794	0.139	0.214	0.050	31,854,467	31,477,413
Ghent	2	2,101	1,813	976	0.180	0.108	0.058	23,378,147	33,536,165
Ghent	3	3,578	3,363	483	0.199	0.203	0.030	35,919,897	32,698,639
Ghent	4	1,214	3,359	468	0.079	0.203	0.029	30,683,824	32,663,045
<b>Ghent</b>	<b>Total</b>	<b>9,114</b>	<b>12,188</b>	<b>2,721</b>	<b>0.155</b>	<b>0.186</b>	<b>0.041</b>	<b>121,836,336</b>	<b>130,375,262</b>

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# **Phase II AQC Study Ghent Station Kickoff**



**Black & Veatch**

**October 2010**

# Agenda

- Regulatory drivers
- PJFF overview
- Overview of phase I results

## Regulatory drivers – still uncertainty

Program Name	Regulated Pollutants	Forecasted Date for Compliance
PSD/NSR	SAM Ghent Units 1- 4	E.ON currently negotiating with EPA
1-hour NAAQS for NO <sub>x</sub>	NO <sub>x</sub>	2015 - 2017
1-hour NAAQS for SO <sub>2</sub>	SO <sub>2</sub>	2016
Clean Air Transport Rule	NO <sub>x</sub> SO <sub>2</sub>	Beginning in 2012 Phase in 2014
New EGU MACT	Mercury Acids (HCl) Metals (PM) Metals (AS) Organics (CO) Dioxin/Furan	Estimated January, 2015; with 1-yr extension - January, 2016

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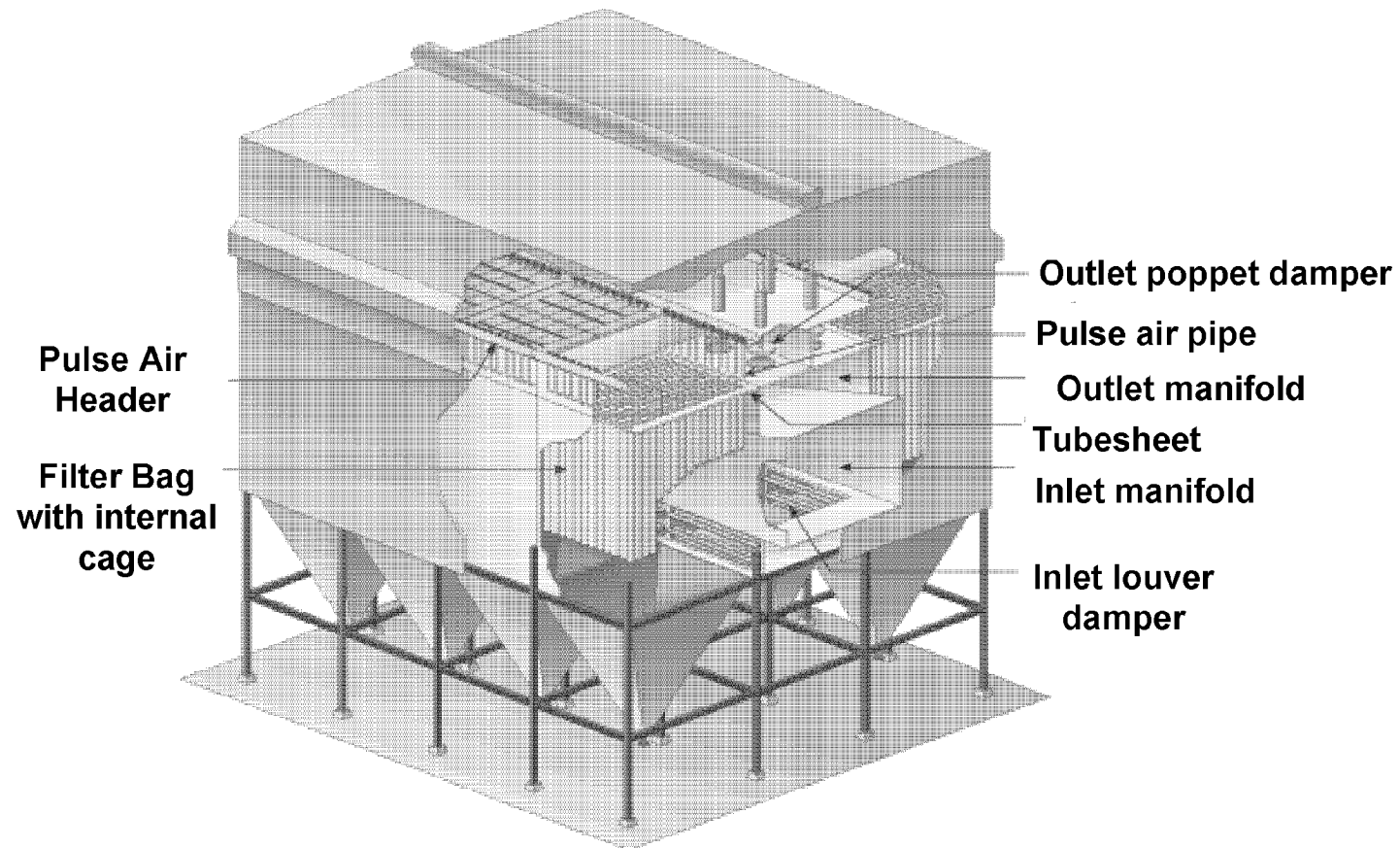


# PJFF Overview

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## PJFF – overall layout



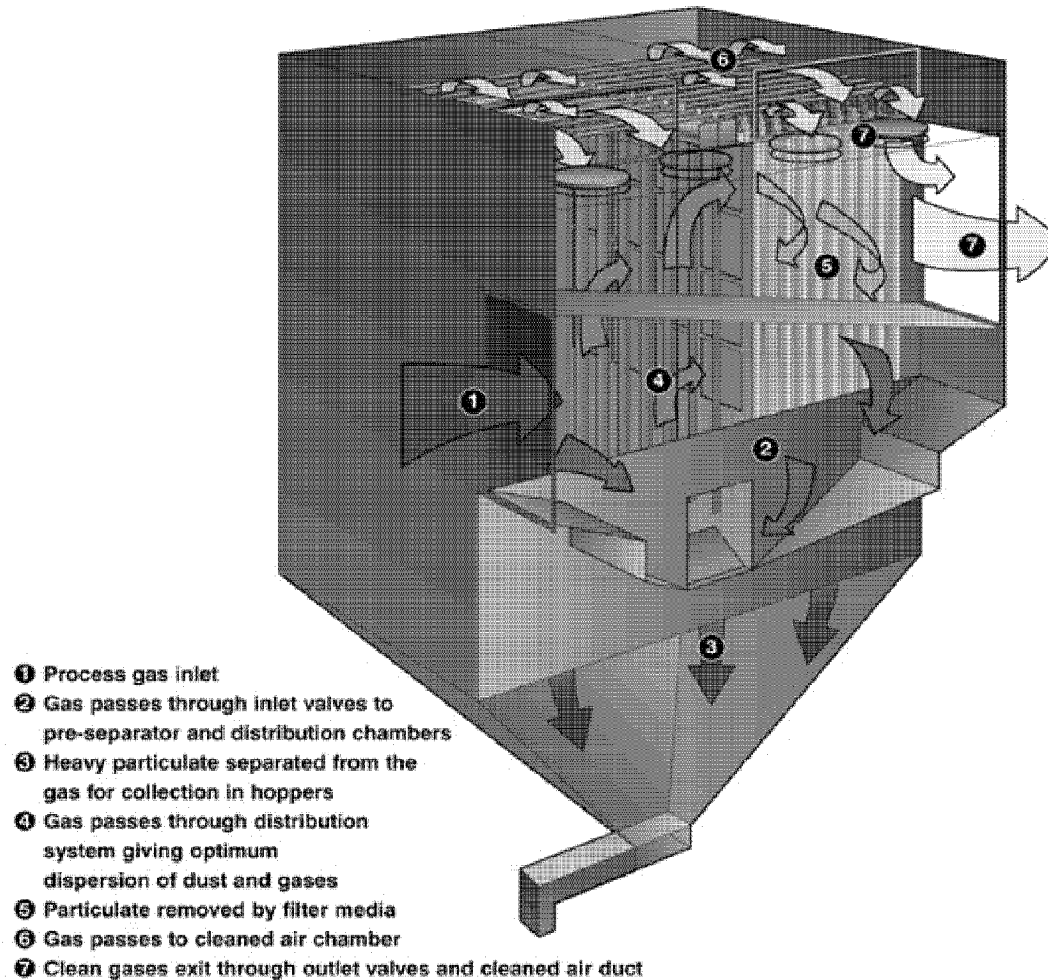
Courtesy: Babcock & Wilcox



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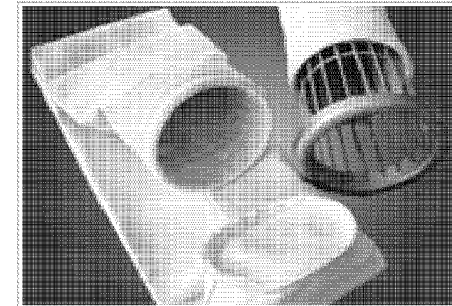
## PJFF – flow diagram





## PJFF advantages vs. DESP

- Fuel flexibility
- High efficiency especially on  $PM_{2.5}$
- Performance is less susceptible to plant operating conditions
- Works well during startups
- Better control of hazardous air pollutants such as heavy metals (Ar, Ni, Pb, etc.)
- Allows reagent injection to work better (Hg or  $SO_3$ )



## PJFF disadvantages vs. DESP

- Bags damaged by high temperatures
- High pressure drop
- Periodic bag replacement



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# Overview of Phase I Results

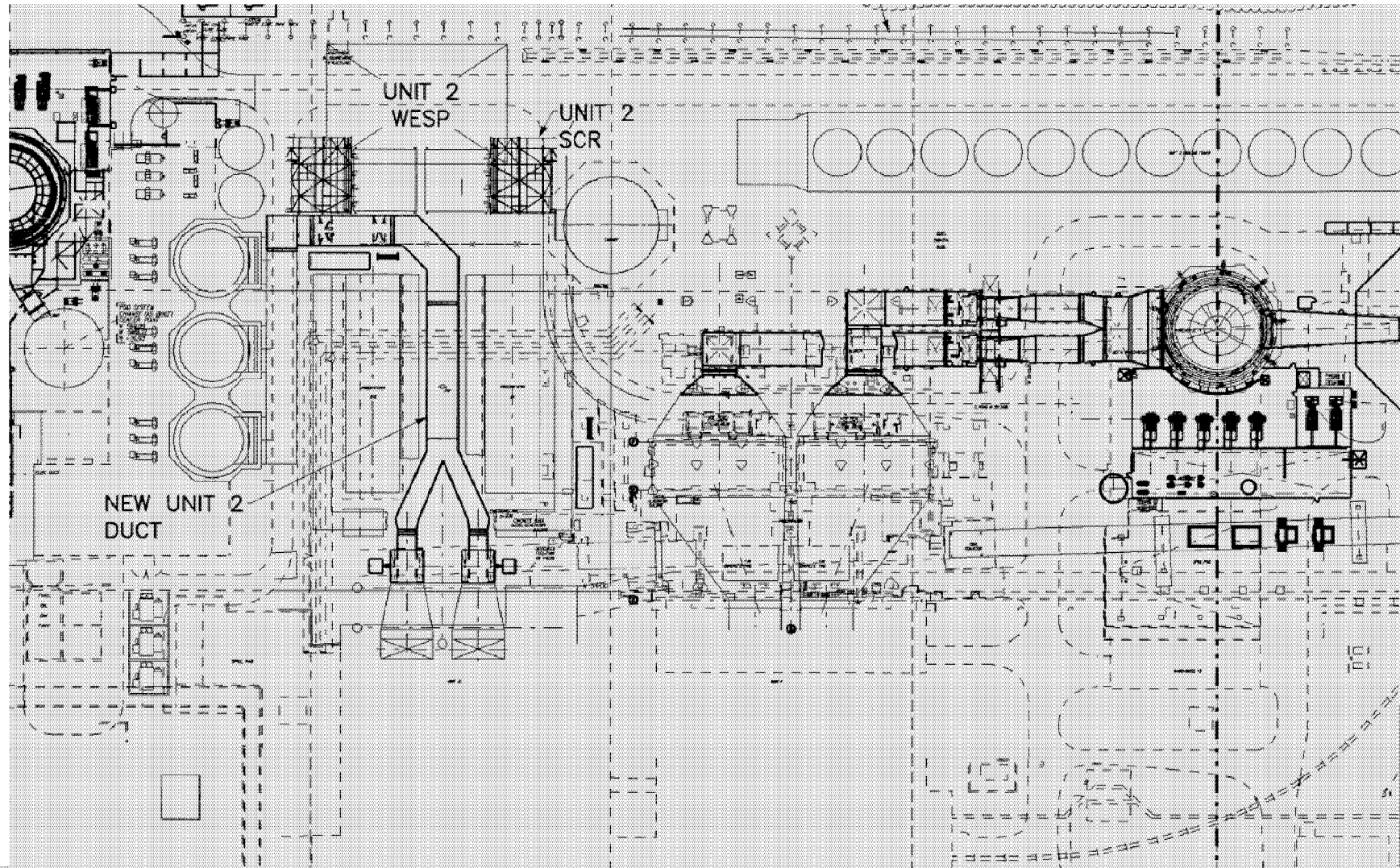
## Phase I AQCS results for Ghent Station

- Ghent Unit 1
  - Pulse Jet Fabric Filter (PJFF)
  - Powdered Activated Carbon (PAC) Injection
- Ghent Unit 2
  - Selective Catalytic Reduction (SCR) System
  - Pulse Jet Fabric Filter (PJFF)
  - Lime / Trona Injection
  - Powdered Activated Carbon (PAC) Injection
- Ghent Unit 3
  - Pulse Jet Fabric Filter (PJFF)
  - Powdered Activated Carbon (PAC) Injection
- Ghent Unit 4
  - Pulse Jet Fabric Filter (PJFF)
  - Powdered Activated Carbon (PAC) Injection

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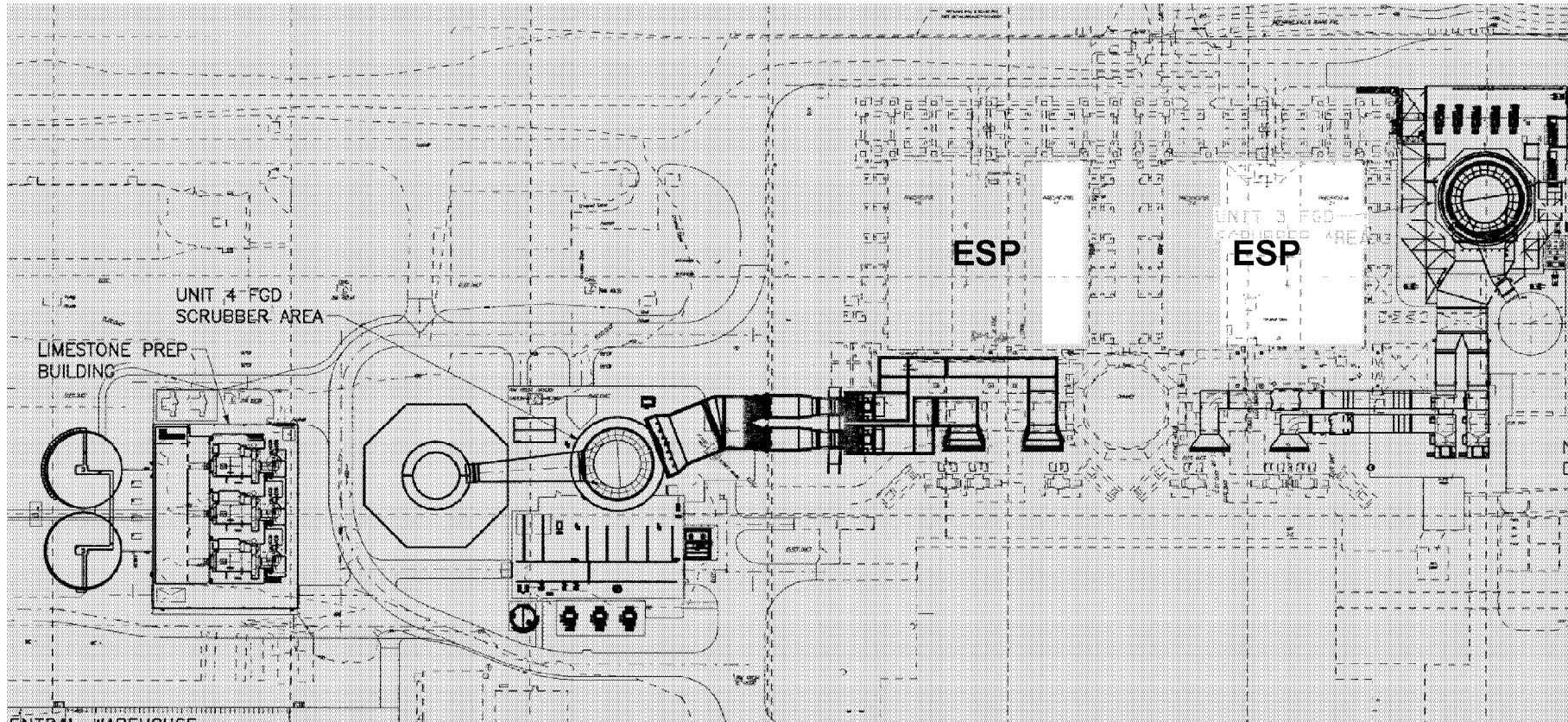


# Ghent Unit 1 and Unit 2 space constraints





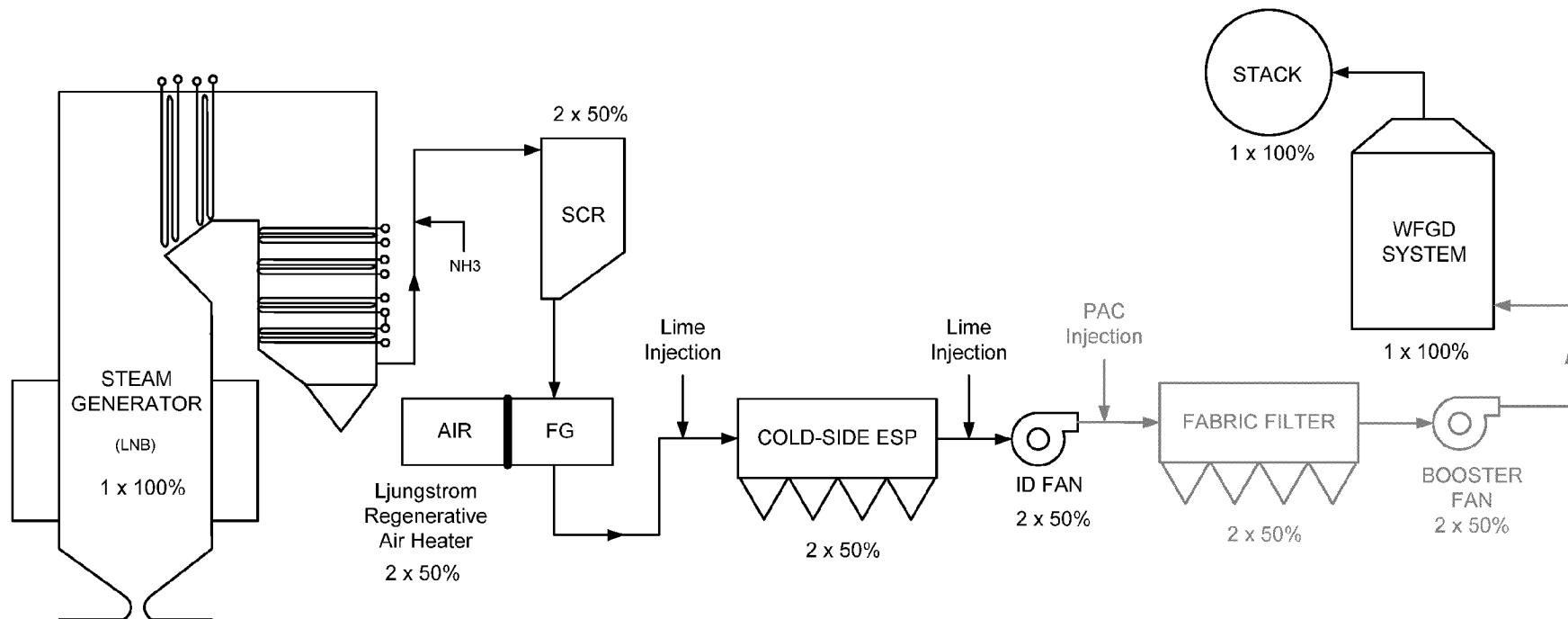
# Ghent Unit 3 and Unit 4 space constraints



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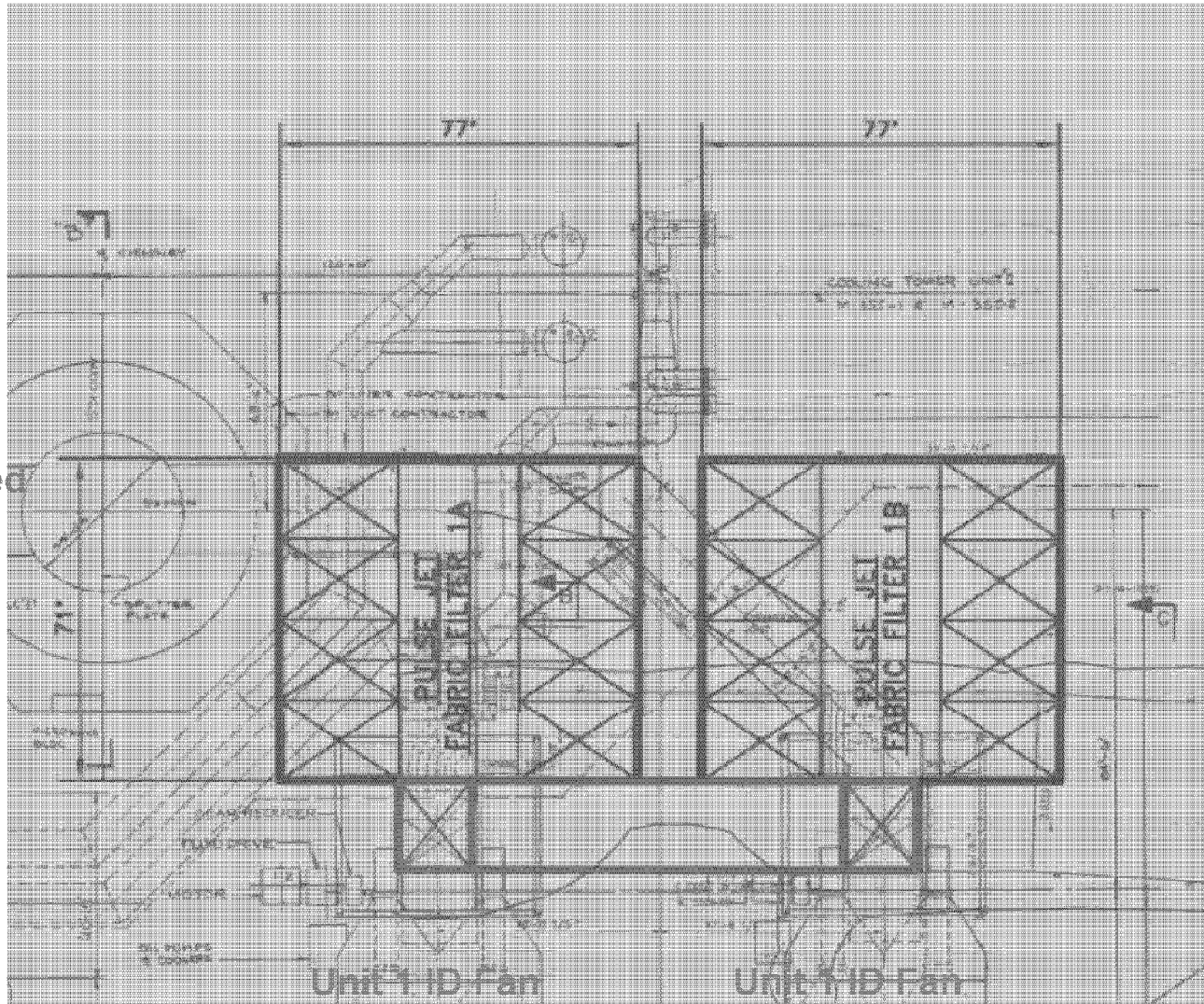


# Ghent Unit 1 layout



# Ghent Unit 1 PJFF layout

Unit 2  
Abandoned  
Stack





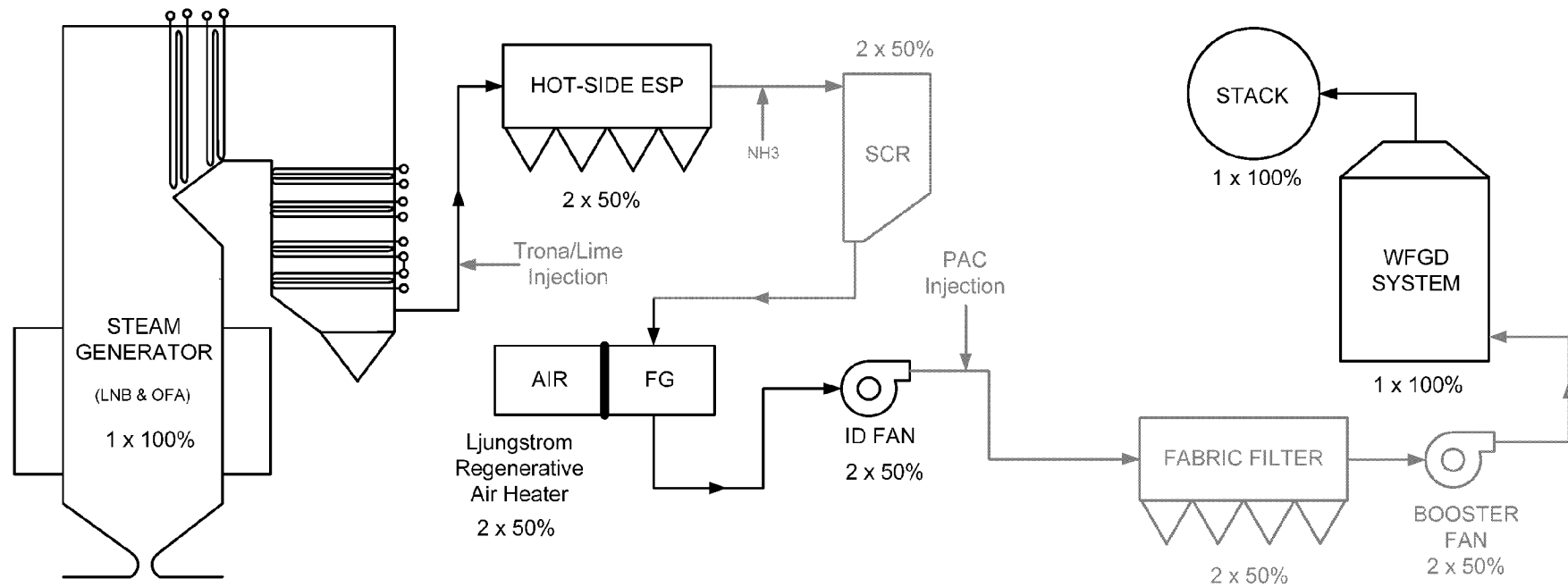
## Ghent Unit 1 PJFF challenges

- Elevated PJFF
- Real estate constraints
- Demolition and relocation of pipe racks
- Difficult crane access
- Restricted cooling tower access during project execution
- Lattice boom / crawler crane booms for final assembly

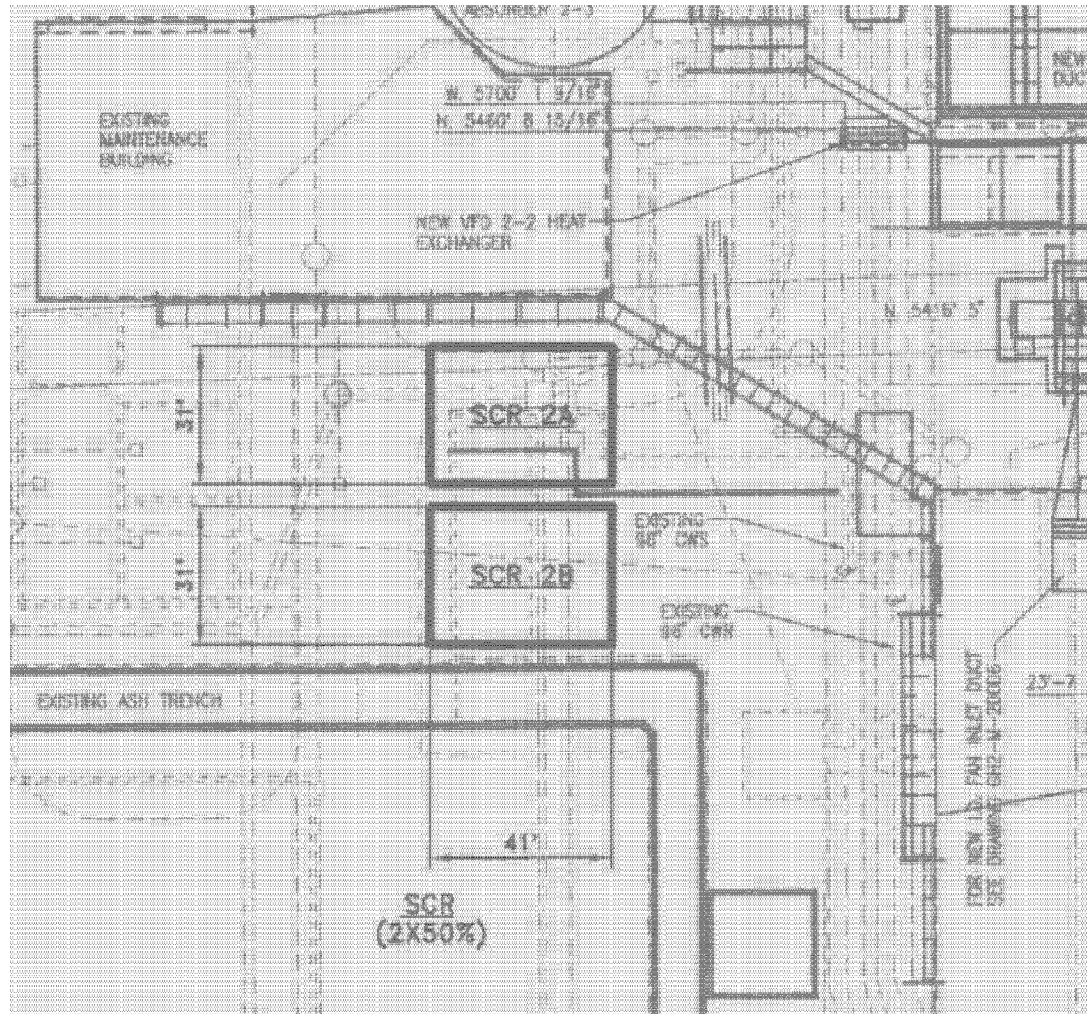
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## Ghent Unit 2 layout



# Ghent Unit 2 SCR layout

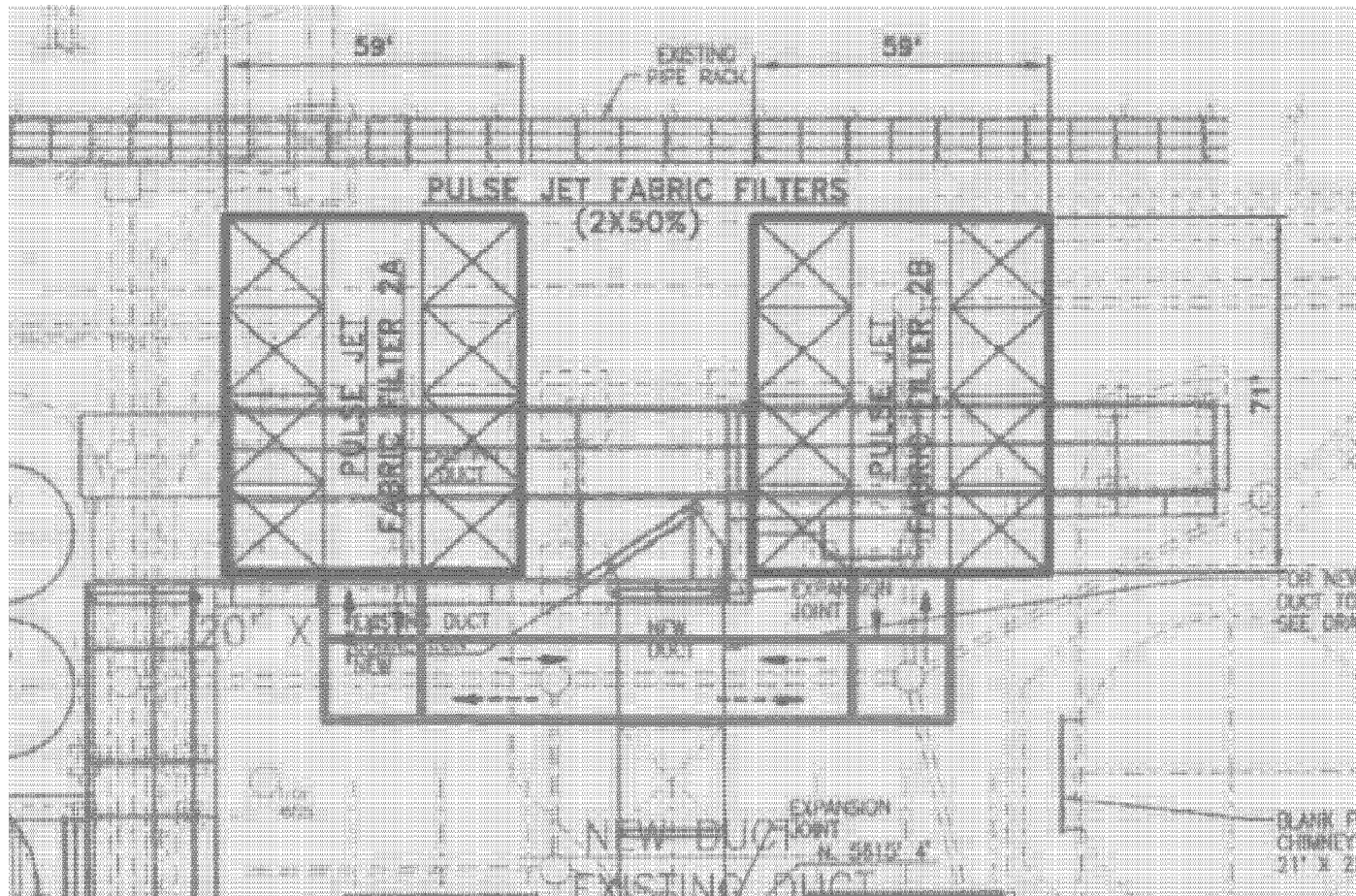


Unit 2  
Boiler  
Building

## Ghent Unit 2 SCR challenges

- Equipment lifting required over areas of high personnel traffic
- Demolition of overhead walkway between Unit 2 & Unit 3 boiler building
- Demolition and relocation of overhead power lines
- Tower crane for heavy equipment and final assembly of SCR
- Demolition and relocation of pipe-racks

# Ghent Unit 2 PJFF layout



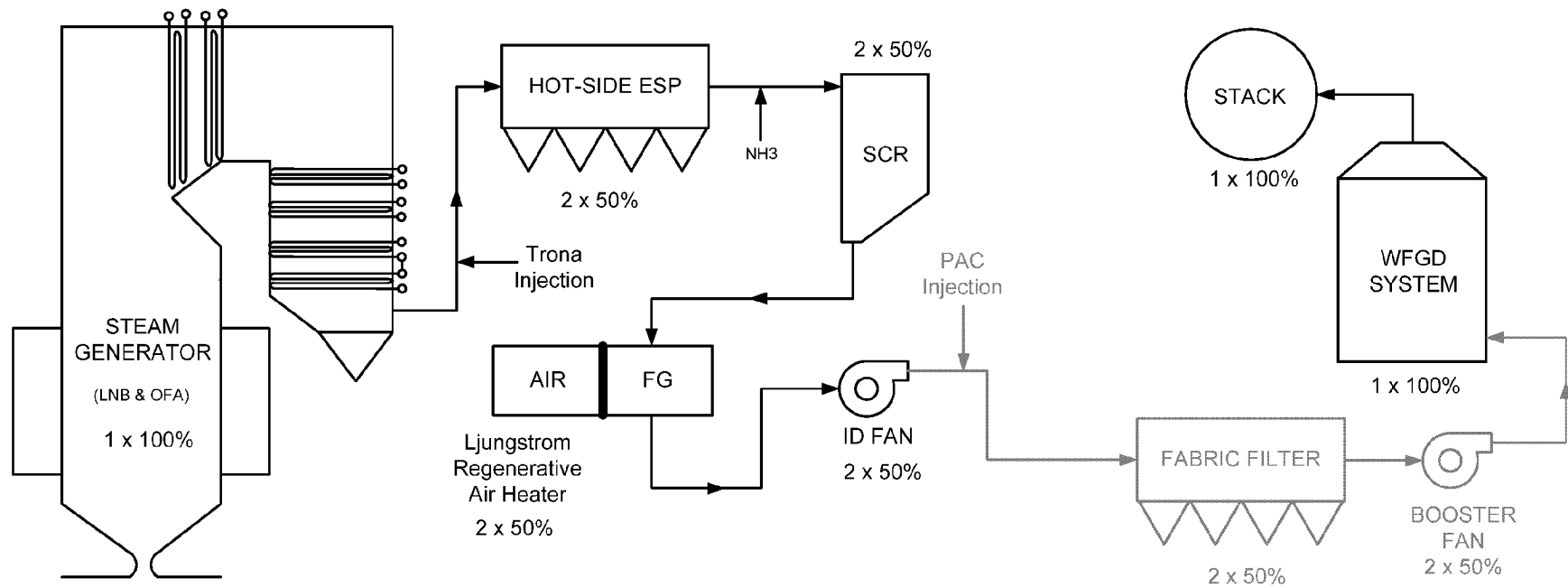
Unit 2 ID Fan  
Outlet Ductwork

## Ghent Unit 2 PJFF challenges

- Elevated PJFF
- Real estate constraints
- Difficult crane access
- Demolition and relocation of pipe racks
- Restricted cooling tower access during project execution
- Lattice boom / crawler crane booms for final assembly
- Bypass duct required



# Ghent Unit 3 / Unit 4 layout





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# Ghent Unit 3 and Unit 4 PJFF layout

