

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

The Electronic Application of Duke Energy )  
Kentucky, Inc. for a Certificate of Public )  
Convenience and Necessity to Convert its Wet Flue ) Case No. 2024-00152  
Gas Desulfurization System from a Quicklime )  
Reagent Process to a Limestone Reagent Handling )  
System at its East Bend Generating Station and for )  
Approval to Amend its Environmental Compliance )  
Plan for Recovery by Environmental Surcharge )  
Mechanism )

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**APPLICATION OF DUKE ENERGY KENTUCKY, INC.**

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Now comes Duke Energy Kentucky, Inc. (Duke Energy Kentucky or the Company), by and through counsel, pursuant to KRS 278.020(1), KRS 278.183, and 807 KAR 5:001 Sections 14 and 15, and hereby respectfully requests the Kentucky Public Service Commission (Commission) to issue an Order approving: (1) a Certificate of Public Convenience and Necessity (CPCN) for the construction and conversion of its existing Wet Flue Gas Desulfurization (WFGD) from a quicklime handling process to a limestone handling process to continue to meet existing environmental regulations (Limestone Conversion Project); (2) amendment of the Company’s Environmental Compliance Plan (ECP) to include the Limestone Conversion Project construction and operation, and reagents; (3) recovery of the Limestone Conversion Project costs through the Company’ Environmental Surcharge Mechanism (ESM); and (4) any other necessary relief and approvals. In support of this Application, Duke Energy Kentucky states as follows:

**Introduction**

1. Duke Energy Kentucky is a Kentucky corporation with its principal office and

principal place of business at 139 East Fourth Street, Cincinnati, Ohio 45202. The Company's local office in Kentucky is Duke Energy Erlanger Operations Center, 1262 Cox Road, Erlanger, Kentucky 41018. The Company further states that its electronic mail address for purposes of this matter is [KYfilings@duke-energy.com](mailto:KYfilings@duke-energy.com).

2. Duke Energy Kentucky is a utility engaged in the gas and electric business. Duke Energy Kentucky purchases, sells, stores and transports natural gas in the Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton Counties. Duke Energy Kentucky also generates electricity, which it distributes and sells, in the Boone, Campbell, Grant, Kenton, and Pendleton Counties.

3. Pursuant to 807 KAR 5:001, Section 14(2), Duke Energy Kentucky states that it was originally incorporated in the Commonwealth of Kentucky on March 20, 1901, and attests that it is currently in good standing in said Commonwealth. A copy of a certificate of good standing is included as Exhibit 1 to this Application.

4. Pursuant to KRS 278.380, Duke Energy Kentucky waives any right to service of Commission orders by mail for purposes of this proceeding only. Copies of all orders, pleadings, and other communications related to this proceeding should be directed to:

Rocco O. D'Ascenzo  
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and

Sarah E. Lawler  
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Duke Energy Kentucky, Inc.  
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### **Background**

5. On or about December 5, 2003, in Case No. 2003-00252, the Commission approved Duke Energy Kentucky's acquisition of three generating stations from Duke Energy Ohio; East Bend Unit 2 (East Bend), Miami Fort Unit 6 and Woodsdale. Effective January 1, 2006, Duke Energy Kentucky completed the acquisition of these three generating stations. Effective December 31, 2014, Duke Energy Kentucky became the sole owner of East Bend, having completed the purchase of The Dayton Power and Light Company's 31 percent interest in the station as authorized by the Commission in Case No. 2014-00201.<sup>1</sup>

6. East Bend is a 600 megawatt (MW) (net summer rating) coal-fired steam unit located along the Ohio River in Boone County, Kentucky, which was commissioned in 1981. East Bend is the Company's only baseload and coal-fired generator, providing the majority of the capacity to serve the Company's Northern Kentucky load.

7. There are several environmental programs promulgated by the United States Environmental Protection Agency (U.S. EPA) under the Clean Air Act (CAA) as well as the Commonwealth of Kentucky, that impact all of the Company's generating stations, and

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<sup>1</sup> *In the Matter of the Application of Duke Energy Kentucky, Inc., for (1) A Certificate of Public Convenience and Necessity Authorizing the Acquisition of the Dayton Power & Light Company's 31% Interest in the East Bend Generating Station; (2) Approval of Duke Energy Kentucky, Inc.'s Assumption of Certain Liabilities in Connection with the Acquisition; (3) Deferral of Costs Incurred as Part of the Acquisition; and (4) All Other Necessary Waivers, Approvals, and Relief*, Case No. 2014-00201 (Ky.P.S.C. Dec. 4, 2014).

particularly East Bend. The U.S. EPA regulations are the primary drivers of Duke Energy Kentucky's environmental compliance strategies for its plants. These CAA regulations are as follows: the Mercury and Air Toxics Standard (MATS Rule) and the Cross State Air Pollution Rule (CSAPR) including the U.S. EPA's September 2016 final CSAPR Update Rule. The regulations that most directly impact the Company's ash handling strategy as it pertains to East Bend are the CAA and the CCR Final Rule and ELG Final Rule

8. The major pollution control features at East Bend include a high-efficiency hot side electrostatic precipitator, a selective catalytic reduction control (SCR) system designed to reduce nitrogen oxide (NO<sub>x</sub>) emissions by 85 percent, and a WFGD system designed to remove sulfur dioxide (SO<sub>2</sub>) emissions to an average of 97 percent. The WFGD currently utilizes a magnesium enhanced lime (MEL) technology to control the station's SO<sub>2</sub> emissions. This MEL technology is unique to the 1980's vintage WFGD and is the only one of its kind within the Duke Energy fleet of coal-fired generation.

9. The MEL technology relies on pebble quicklime containing a small fraction of dolomite as the reagent. Dolomite is comprised of about 50% magnesium oxide which, when added to the absorber with the lime reagent, dissolves and promotes elevated concentrations of sulfite. Sulfite is an effective source of liquid-phase alkalinity, which facilitates high SO<sub>2</sub> removal efficiency for boilers firing high sulfur coal. The primary benefit of scrubbing with MEL is that the required absorber recycle slurry pumping capacity is lower than limestone-based FGD systems – typically in the range of 40 to 50 gallons per 1,000 cubic feet of treated flue gas – and results in smaller pumps with lower power requirements

10. Despite some process advantages, MEL scrubbing has several disadvantages including the production of calcium sulfite (CaSO<sub>3</sub>) solids that are typically difficult to dewater.



As a result, significant quantities of fly ash and lime must be added to the filtered solids to produce a stable product, called poz-o-tec, that is suitable for disposal in an onsite landfill. Another disadvantage of the MEL scrubbing process is the reliance on an expensive lime reagent – quicklime, and stabilization additives which in recent years, has detrimentally impacted East Bend’s competitiveness in the power generation markets.

11. At the time of its construction, and in years past, the cost of the quicklime was reasonable and was a popular choice for SO<sub>2</sub> removal in the Ohio River Valley. In the early 1980s, when the system at East Bend was designed, the cost of lime was modest; delivered prices were about \$40 per ton. Since then, the price for delivered quicklime has risen dramatically to well over \$100 per ton. The approximate cost at East Bend in 2022 was \$133 per ton. However, with many Midwest power plants retiring or converting to lower cost reagents such as limestone, the availability of supply, number of suppliers, and quality of MEL has been adversely impacted creating exponential increasing costs and risks to the future availability of supply. A request for proposal (RFP) issued in mid-2023 produced a lime cost per ton that is more than double that paid in 2022. East Bend has experienced a 247 percent increase in the mag-lime reagent cost over the last 10 years and a 125 percent increase in in the last two years. Due to the energy intensity to produce the MEL reagent product, the Company expects the reagent to continually escalate at a rate double that of limestone.

12. Duke Energy Kentucky has recently been made aware of additional limitations to MEL supply leading to material cost increases and a risk in availability of supply alternatives creating future availability concerns.

13. If Duke Energy Kentucky is unable to procure the reagents necessary to operate its WFGD, the Company will not be able to comply with the aforementioned environmental

regulations or continue operating East Bend in compliance and would likely be forced to retire the plant prematurely. The reagent supply scarcity and associated price risks for Duke Energy Kentucky must be addressed to continue providing cost-effective, safe and reliable service to our Kentucky customers.

14. The increase in current lime-based reagent costs negatively impacts the dispatch costs for East Bend. As the cost for the existing lime process continues to escalate, the value of the unit in the wholesale market continues to diminish and its capacity factor decreases. This results in Duke Energy Kentucky purchasing more economy power from the market and not generating itself.

15. To address the rising cost of the quicklime reagent, and the risk of an inability to operate the unit absent a viable reagent replacement, Duke Energy Kentucky's fuel sourcing organization has explored several alternatives, including 1) the Lime Stone Conversion project; 2) conducting requests for proposals (RFP) to explore alternative sources for the existing MEL product with the correct chemical composition to operate the WFGD system; and 3) system renovations for onsite mixing of magnesium hydroxide with hi-calcium quicklime to create a replacement mag-lime product that possesses similar chemical composition to operate the existing WFGD system.

16. An RFP alternative is not a viable solution going forward as in its most recent solicitation, the Company did not receive competitive offers, which resulted in significant cost increases.

17. The onsite mixing of chemicals with high-calcium quicklime was a more expensive alternative as it would require the Company to purchase significant amounts of magnesium hydroxide to meet the correct chemical content specifications to operate the WFGD increasing the

Company's reagent costs and further eroding the unit's economics in the competitive markets. Moreover, this strategy did not alleviate the scarcity risk with obtaining a lime-based reagent product. Because this solution does not sufficiently mitigate the risk of a lack of certainty of reagent supplies it was not a reasonable and viable solution.

18. The conversion of the WFGD to a limestone inhibited oxidation process (LSIO) is the most economic and most reasonable solution. The LSIO chemistry will improve the dewatering properties of the calcium sulfite solids by creating larger, more regular, and symmetric crystals and provide a lower cost alternative for reagents going forward. This proposed Limestone Conversion Project process should result in lower reagent costs than the current mag-lime-based process, which in turn should provide downward pressure on East Bend's total dispatch cost in the wholesale energy markets and should result in an increased capacity factor.

19. The Limestone Conversion Project scope includes modifications to existing equipment and is based on a turnkey delivery, including engineering, procurement, and construction. The conversion of the East Bend WFGD system to LSIO operation involves several process, equipment, and system changes including:

- a. Minor modifications to reagent receiving, conveying, and storage systems;
- b. Installation of new reagent feeders and conveying equipment;
- c. Installation of new limestone pre-crushers and grinding mills;
- d. Refurbishment and resheaving of absorber recycle pumps
- e. Installation of new absorber recycle slurry piping, cross-tie piping, spray headers, and spray nozzles;
- f. Operation of all absorber recycle slurry pumps to enhance SO<sub>2</sub> removal performance;
- g. Modification of the absorber trays to enhance SO<sub>2</sub> removal performance;
- h. Installation of a buffer additive storage and feed system to enhance SO<sub>2</sub> removal performance;
- i. Replacement of existing emulsified sulfur storage tank and fees system to improve system reliability and inhibit sulfite oxidation

- j. Upgrade of mist eliminator wash water supply system;
- k. Replacement of waste slurry storage tank, thickener underflow sludge tank and lime slurry tank agitators; and
- l. Installation of a filtrate purge system to control process chloride levels.

Modeling shows that conversion to a LSIO- limestone reagent process is economic in most future scenarios and produces a reduced variable operational cost and lower dispatch cost reducing the Company's reliance upon market purchases for power. Although the Limestone Conversion Project will likely result in a higher overall reagent expenditure due to the anticipated increased economic dispatch of the plant necessitating a greater need and consumption of the limestone reagent, the cost per ton of reagent is anticipated to be significantly lower due to the Limestone Conversion Project. The current class 4 estimated capital cost for the project is approximately \$125.8 million. As explained in accompanying testimony, the conversion would reduce total variable operating and maintenance and produce estimated benefits to customers in terms of fuel cost savings and additional off system sales revenues as compared to continuing the existing processes. This increased economics of East Bend is a benefit to customers as it will likely reduce the need for replacement power from the market.

**Request for Certificate of Public Convenience and Necessity**

20. Duke Energy Kentucky requests Commission authorization through a CPCN to construct the Limestone Conversion Project.

21. In accordance with KRS 278.020, No utility may construct or acquire any facility to be used in providing utility service to the public until it has obtained a CPCN from the Kentucky Public Service Commission.<sup>2</sup> To obtain a CPCN, the utility must demonstrate a need for such facilities and an absence of wasteful duplication.<sup>3</sup> "Need" requires:

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<sup>2</sup> KRS 278.020(1)(a).

<sup>3</sup> *Kentucky Utilities Co. v. Pub. Serv. Comm'n*, 252 S.W.2d 885 (Ky. 1952).

[A] showing of a substantial inadequacy of existing service, involving a consumer market sufficiently large to make it economically feasible for the new system or facility to be constructed or operated. [T]he inadequacy must be due either to a substantial deficiency of service facilities, beyond what could be supplied by normal improvements in the ordinary course of business; or to indifference, poor management or disregard of the rights of consumers, persisting over such a period of time as to establish an inability or unwillingness to render adequate service.<sup>4</sup>

"Wasteful duplication" is defined as "an excess of capacity over need" and "an excessive investment in relation to productivity or efficiency, and an unnecessary multiplicity of physical properties."<sup>5</sup> To demonstrate that a proposed facility does not result in wasteful duplication, Duke Energy Kentucky must demonstrate that a thorough review of all reasonable alternatives has been performed. Although cost is a factor, selection of a proposal that ultimately costs more than an alternative does not necessarily result in wasteful duplication.<sup>6</sup> All relevant factors must be balanced.<sup>7</sup>

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<sup>4</sup> *Id.* at 890.

<sup>5</sup> *Id.*

<sup>6</sup> See *Kentucky Utilities Co. v. Pub. Serv. Comm'n*, 390 S.W.2d 168, 175 (Ky. 1965). See also *Case No. 2005-00089, Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity for the Construction of a 138 kV Electric Transmission Line in Rowan County, Kentucky* (Ky. PSC Aug. 19, 2005), final Order

<sup>7</sup> *Case No. 2005-00142, Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for a Certificate of Public Convenience and Necessity for the Construction of Transmission Facilities in Jefferson, Bullitt, Meade, and Hardin Counties, Kentucky* (Ky. PSC Sept. 8, 2005).

22. In accordance with 807 KAR 5:001 Section 12(2)(a)-(i), Duke Energy Kentucky is filing the following financial information in Exhibit 2, which is incorporated herein and made a part of this Application filed in this proceeding:

<u>Exhibit 2</u>	<u>Description</u>	<u>807 KAR 5:001</u>
<u>Page</u>		<u>Section Reference</u>
	Financial Exhibit	12(2)
1	Amount and kinds of stock authorized	12(2)(a)
1	Amount and kinds of stock issued and outstanding	12(2)(b)
1	Terms of preference or preferred stock	12(2)(c)
1	Brief description of each mortgage on property of Duke Energy Kentucky	12(2)(d)
1-2	Amount of bonds authorized and issued and related information	12(2)(e)
2	Notes outstanding and related information	12(2)(f)
2-3	Other indebtedness and related information	12(2)(g)
3	Dividend information	12(2)(h)
3-5	Detailed Income Statement and Balance Sheet	12(2)(i)

23. Additionally, requirements for Applications requesting a CPCN related to a new construction or extension are set forth in 807 KAR 5:001 § 14 and 15(2) *et seq.*, and include the following requirements:

Section 14:

- (1) Each application shall state the full name, mailing address, and electronic mail address of the applicant, and shall contain fully the facts on which the application is based, with a request for the order, authorization, permission, or certificate desired and a reference to the particular law requiring or providing for the information.
- (2) If a corporation, the applicant shall identify in the application the state in which it is incorporated and the date of its incorporation, attest that it is currently in good standing in the state in which it is incorporated, and, if it is not a Kentucky corporation, state if it is authorized to transact business in Kentucky.<sup>8</sup>

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<sup>8</sup> 807 KAR 1:005 § 14; Sub sections 2 and 4 are inapplicable as Duke Energy Kentucky is a Kentucky Corporation.

Section 15(2):

- (a) The facts relied upon to show that the proposed construction or extension is or will be required by public convenience or necessity;
- (b) Copies of franchises or permits, if any, from the proper public authority for the proposed construction or extension, if not previously filed with the commission;
- (c) A full description of the proposed location, route, or routes of the proposed construction or extension, including a description of the manner of the construction and the names of all public utilities, corporations, or persons with whom the proposed construction or extension is likely to compete;
- (d) One (1) copy in portable document format on electronic storage medium and two (2) copies in paper medium of:
  - 1. Maps to suitable scale showing the location or route of the proposed construction or extension, as well as the location to scale of like facilities owned by others located anywhere within the map area with adequate identification as to the ownership of the other facilities; and
  - 2. Plans and specifications and drawings of the proposed plant, equipment, and facilities;
- (e) The manner in detail in which the applicant proposes to finance the proposed construction or extension; and
- (f) An estimated annual cost of operation after the proposed facilities are placed into service.

24. Section 14- Name, Address, electronic mail address of Applicant, facts upon which the Application is based, and reference to the particular law: See paragraphs 1 through 23 above, which are incorporated by reference as if fully restated herein.

25. Section 15(2)(a)- Statement of Need: The facts relied upon to demonstrate the Limestone Conversion Project is required by public convenience and necessity are set forth within this Application and in the Testimony submitted in support thereof. In summary, the existing reagent process needed to operate the Company's East Bend WFGD is insufficient to continue its operation due to unreasonable and uncontrollable increases in reagent prices, a lack of competitive RFP responses, scarcity of supply and an overall risk of an inability to comply and continue operating the station if a suitable replacement is not timely implemented. Duke Energy Kentucky has explored several alternative strategies and has determined that the Limestone Conversion

Project is the least-cost and most reasonable solution to continue complying with Federal environmental regulations, including the CAA.

26. Section 15(2)(b)- Copies of Franchises and Permits: The Company has previously filed with the Commission the applicable franchises from the proper public authorities. In addition, because much of the existing equipment will be used as part of the Limestone Conversion, only minor air source permit modifications will be necessary to construct the Limestone Conversion Project. A copy of the minor air source permit application, submitted on July 17, 2012 is attached as Exhibit 3.

27. Section 15(2)(c)- Description of the Proposed Location, Manner of Construction, and Competing Utilities, Companies, or Persons: Exhibit 4 contains maps of the East Bend facility and depicts the approximate location of the Limestone Conversion construction. Exhibit 3 further contains a description of how the construction will occur. Additionally, the direct testimony accompanying this Application further describes the manner of construction. This project will be constructed on the existing East Bend site, which is owned by Duke Energy Kentucky and will be used by the Company to continue to meet environmental regulations impacting the operation of the East Bend station. Consequently, there are no other utilities, persons or corporations competing with the proposed facilities to be constructed.

28. Section 15(2)(d)- Maps and Specifications: Exhibit 3 includes overhead maps of the site showing the location of the East Landfill and closure construction. Exhibit 4 includes the design plans, specifications, and drawings of the East Landfill closure.

29. Section 15(2)(e)- Manner of Proposed Financing: the Company states that the total, fully loaded projected costs for Limestone Conversion Project is \$125.8million, including contingency and escalation. Duke Energy Kentucky seeks to recover these costs through its ESM



as part of its ECP. Duke Energy Kentucky expects to finance the costs of construction with a combination of new debt and equity and through ongoing operations. The mix of debt and equity used to finance the project will be determined so as to allow Duke Energy Kentucky to maintain its investment-grade credit rating.

30. Section 15(2)(f)- Ongoing Cost of Operation: The estimated incremental ongoing costs of operation, will be minimal (<\$10,000 per year, excluding the reagent commodity).

**Request for Recovery by Environmental Surcharge and to Amend Duke Energy Kentucky's Environmental Compliance Plan.**

31. Duke Energy Kentucky is seeking Commission authorization to amend its Environmental Compliance Plan, (ECP) to include the construction, operation and maintenance of the Limestone Conversion Project as well as the associated reagents. This conversion will enable Duke Energy Kentucky to continue operation of East Bend in compliance with applicable environmental regulations, including but not limited to, the U.S. EPA CAA, MATS, and CSAPR, as well as other environmental regulations. .

32. Duke Kentucky's ESM and ECP are governed by KRS 278.183 which provides in relevant part:

(1) . . . [A] utility shall be entitled to the current recovery of its costs of complying with the Federal Clean Air Act as amended and those federal, state, or local environmental requirements which apply to coal combustion wastes and by-products from facilities utilized for production of energy from coal in accordance with the utility's compliance plan . . .

(2) Recovery of costs pursuant to subsection (1) of this section that are not already included in existing rates shall be by environmental surcharge to existing rates imposed as a positive or negative adjustment to customer bills in the

second month following the month in which costs are incurred. Each utility, before initially imposing an environmental surcharge pursuant to this subsection, shall thirty (30) days in advance file a notice of intent to file said plan and subsequently submit to the commission a plan, including any application required by KRS 278.020(1), for complying with the applicable environmental requirements set forth in subsection (1) of this section. The plan shall include the utility's testimony concerning a reasonable return on compliance-related capital expenditures and a tariff addition containing the terms and conditions of a proposed surcharge as applied to individual rate classes. Within six (6) months of submittal, the commission shall conduct a hearing upon the request of a party, and shall, regardless of whether or not a hearing is requested:

(a) Consider and approve the plan and rate surcharge if the commission finds the plan and rate surcharge reasonable and cost-effective for compliance with the applicable environmental requirements set forth in subsection (1) of this section;

(b) Establish a reasonable return on compliance-related capital expenditures; and

(c) Approve the application of the surcharge.

Duke Energy Kentucky submits that the CPCN is necessary to comply with existing environmental regulations affecting its coal-fired generation. The Company is entitled to amend its ECP and ESM because: 1) the need for this Limestone Conversion Project CPCN arises from the need to continue complying with environmental regulations applicable to coal combustion generating facilities and the current method is experiencing and will continue to experience significant price increases and there is a serious risk that the existing reagent process will no longer

be able to function due to resource scarcity; 2) the costs of construction and operation of this Limestone Conversion Project CPCN are not already included in existing rates; and 3) the ECP and ESM are reasonable and cost-effective as it results in a lower cost for customers and avoids the risk of not having access to necessary reagents and premature plant closure.

33. This Application and supporting testimony and exhibits are available for public inspection at Duke Energy Kentucky's local Kentucky office located at Duke Energy Erlanger Operations Center, 1262 Cox Road, Erlanger, Kentucky 41018. The Company is giving notice to the public of the proposal to recover the Limestone Conversion Project through its existing environmental surcharge by newspaper publication. The Company is also posting this Application on its website at [www.duke-energy.com](http://www.duke-energy.com). An initial Certificate of Notice and Publication is filed with this Application as Exhibit 5. A Certification of Completed Notice and Publication will be filed with the Commission upon completion of same pursuant to 807 KAR 5:001, Section 17(3)(b).

34. Pursuant to KRS 278.183(1), Duke Energy Kentucky is "entitled to the current recovery of its costs of complying with the Federal Clean Air Act as amended and those federal, state, or local environmental requirements which apply to coal combustion wastes and byproducts from facilities utilized for production of energy from coal in accordance with the utility's compliance plan."

35. A detailed summary of the facts and compliance requirements supporting this Application is set forth in the direct testimony and exhibits of the Company's witnesses:

36. The testimony of John A. Verderame, Vice President of Fuels and Systems Optimization, who discusses the need and justification of the Limestone Conversion Project, alternatives considered, and why the Limestone Conversion Project is the least cost and most reasonable solution;

37. The testimony of Chad M. Donner, Project Manager, describes the engineering and construction aspects of the Limestone Conversion Project and the estimated costs;

38. The testimony of J. Michael Geers, P.E., Manager Environmental Services, discusses the environmental regulations that necessitate the Limestone Conversion Project; and

39. The testimony of Sarah E. Lawler, Vice President, Rates and Regulatory Strategy for Ohio/ Kentucky provides an overview of the estimated impact of the Limestone Conversion on Rider ESM, the recovery of the cost of construction and ongoing operation and maintenance, the requested ROE as authorized by the Commission in the Company's most recent electric base rate case proceeding and the estimated monthly bill impact for residential and non-residential customers.

40. Duke Energy Kentucky proposed Environmental Surcharge Mechanism tariff sheet, K.Y.P.S.C. No. 19, Sheet No. 76 is attached as Exhibit 6 to this Application, and reflects changes the issue and effective dates and to include the Limestone Conversion Project and the new limestone reagent. In accordance with KRS 278.183(2), the ESM tariff has an issue date of July 25, 2024, and is proposed to be effective on August 25, 2024, to begin recovery of construction activities following Commission approval of the requested CPCN. The Company projects that bills issued following Commission approval will reflect the revised environmental surcharge.

**WHEREFORE**, Duke Energy Kentucky respectfully requests the Kentucky Public Service Commission to enter an order: 1) granting Duke Energy Kentucky a Certificate of Public Convenience and Necessity to construct, operate and maintain its Limestone Conversion Project; 2) approving the amendment to Duke Energy Kentucky's ECP to include the construction and operation of the Limestone Conversion Project and associated reagents; 3) approving the proposed ESM tariff for recovery of the costs of for bills rendered following Commission approval; 4)

recovery of the overall ROE requested herein; and 5) granting such other relief as Duke Energy Kentucky may be entitled under the law.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.

*/s/ Rocco O. D'Ascenzo*

Rocco O. D'Ascenzo (92796)

Deputy General Counsel

Duke Energy Business Services LLC

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on July 25 2024; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

John G. Horne, II  
The Office of the Attorney General  
Utility Intervention and Rate Division  
700 Capital Avenue, Ste 118  
Frankfort, Kentucky 40601

*/s/Rocco D'Ascenzo*  
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Rocco D'Ascenzo

**Commonwealth of Kentucky**  
**Michael G. Adams, Secretary of State**

Michael G. Adams  
Secretary of State  
P. O. Box 718  
Frankfort, KY 40602-0718  
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**Certificate of Existence**

Authentication number: 316232

Visit <https://web.sos.ky.gov/ftshow/certvalidate.aspx> to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

**DUKE ENERGY KENTUCKY, INC.**

DUKE ENERGY KENTUCKY, INC. is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 271B, whose date of incorporation is March 20, 1901 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 25<sup>th</sup> day of July, 2024, in the 233<sup>rd</sup> year of the Commonwealth.



*Michael G. Adams*

Michael G. Adams  
Secretary of State  
Commonwealth of Kentucky  
316232/0052929

**FINANCIAL EXHIBIT**

(1) **Section 12(2)(a) Amount and kinds of stock authorized.**

1,000,000 shares of Capital Stock \$15 par value amounting to \$15,000,000 par value.

(2) **Section 12(2)(b) Amount and kinds of stock issued and outstanding.**

585,333 shares of Capital Stock \$15 par value amounting to \$8,779,995 total par value. Total Capital Stock and Additional Paid-in Capital as of May 31, 2024:

Capital Stock and Additional Paid-in Capital  
As of May 31, 2024  
(\$ per 1,000)

Capital Stock	\$8,780
Premiums thereon	18,839
Total Capital Contributions from Parent (since 2006)	334,311
Contribution from Parent Company for Purchase of Generation Assets	<u>140,061</u>
Total Capital Stock and Additional Paid-in-Capital	<u>\$501,991</u>

(3) **Section 12(2)(c) Terms of preference or preferred stock, cumulative or participating, or on dividends or assets or otherwise.**

There is no preferred stock authorized, issued or outstanding.

(4) **Section 12(2)(d) Brief description of each mortgage on property of applicant, giving date of execution, name of mortgagor, name or mortgagee, or trustee, amount of indebtedness authorized to be secured, and the amount of indebtedness actually secured, together with any sinking fund provision.**

Duke Energy Kentucky does not have any liabilities secured by a mortgage.

(5) **Section 12(2)(e) Amount of bonds authorized, and amount issued, giving the name of the public utility which issued the same, describing each class separately, and giving the date of issue, face value, rate of interest, date of maturity and how secured, together with the amount of interest paid thereon during the last fiscal year.**

The Company has thirteen outstanding issues of unsecured senior debentures issued under an Indenture dated December 1, 2004, between itself and Deutsche Bank Trust Company Americas, as Trustee, as supplemented by eight Supplemental Indentures. The Indenture



allows the Company to issue debt securities in an unlimited amount from time to time. The Debentures issued and outstanding under the Indenture are the following:

Supplemental Indenture	Date of Issue	Principal Amount Authorized and Issued	Principal Amount Outstanding	Rate of Interest	Date of Maturity	Interest Paid Year 2023
1 <sup>st</sup> Supplemental	3/7/2006	65,000,000	65,000,000	6.20%	3/10/2036	4,030,000
3 <sup>rd</sup> Supplemental	1/5/2016	45,000,000	45,000,000	3.42%	1/15/2026	1,539,000
3 <sup>rd</sup> Supplemental	1/5/2016	50,000,000	50,000,000	4.45%	1/15/2046	2,225,000
4 <sup>th</sup> Supplemental	9/7/2017	30,000,000	30,000,000	3.35%	9/15/2029	1,005,000
4 <sup>th</sup> Supplemental	9/7/2017	30,000,000	30,000,000	4.11%	9/15/2047	1,233,000
4 <sup>th</sup> Supplemental	9/7/2017	30,000,000	30,000,000	4.26%	9/15/2057	1,278,000
5 <sup>th</sup> Supplemental	10/3/2018	40,000,000	40,000,000	4.18%	10/15/2028	1,672,000
5 <sup>th</sup> Supplemental	12/12/2018	35,000,000	35,000,000	4.62%	12/15/2048	1,617,000
6 <sup>th</sup> Supplemental	7/17/2019	40,000,000	40,000,000	4.32%	7/15/2049	1,728,000
7 <sup>th</sup> Supplemental	9/15/2019	95,000,000	95,000,000	3.23%	10/1/2025	3,068,500
7 <sup>th</sup> Supplemental	9/15/2019	75,000,000	75,000,000	3.56%	10/1/2029	2,670,000
8 <sup>th</sup> Supplemental	9/15/2020	35,000,000	35,000,000	2.65%	9/15/2030	927,500
8 <sup>th</sup> Supplemental	9/15/2020	35,000,000	35,000,000	3.66%	9/15/2050	1,281,000
			605,000,000			24,274,000

(6) **Section 12(2)(f) Each note outstanding, giving date of issue, amount, date of maturity, rate of interest, in whose favor, together with amount of interest paid thereon during the last fiscal year.**

Duke Energy Kentucky does not have any outstanding notes as of 5/31/2024.

(7) **Section 12(2)(g) Other indebtedness, giving same by classes and describing security, if any, with a brief statement of the devolution or assumption of any portion of such indebtedness upon or by person or corporation if the original liability has been transferred, together with amount of interest paid thereon during the last fiscal year.**

The Company has two series of Pollution Control Revenue Refunding Bonds issued under a Trust Indenture dated as of August 1, 2006 and a Trust Indenture dated as of December 1, 2008, between the County of Boone, Kentucky and Deutsche Bank National Trust Company as Trustee. The Company's obligation to make payments equal to debt service on the Bonds is evidenced by a Loan Agreement dated as of August 1, 2006 and December 1, 2008 between the County of Boone, Kentucky and Duke Energy Kentucky. The Bonds issued under the Indentures are below. On Nov 1, 2021, the Company bought in the Series 2008A bond, and remarketed the bond in June 2022.

Indenture	Date of Issue	Principal Amount Authorized and Issued	Principal Amount Outstanding	Rate of Interest	Date of Maturity	Interest Paid Year 2023
Series 2010	11/24/2010	26,720,000	26,720,000	3.86% <sup>(1)</sup>	8/1/2027	1,031,392
Series 2008A	12/01/2011	50,000,000	<u>50,000,000</u>	3.70% <sup>(2)</sup>	8/1/2027	<u>1,850,000</u>
			76,720,000			2,881,392

(1) The bonds were issued at a variable-rate and were swapped to a fixed rate of 3.86% for the life of the debt.

(2) Bonds were remarketed in June 2022 under a fixed-to-maturity interest rate mode (3.70% coupon).

The Company has no outstanding financing leases as of May 31, 2024.

The Company also has \$54,712,000 of money pool borrowings outstanding as of May 31, 2024, \$25,000,000 of which is classified as Long-Term Debt payable to affiliated companies. This obligation, which is short-term by nature, is classified as long-term due to Duke Energy Kentucky's intent and ability to utilize such borrowings as long-term financing.

**(8) Section 12(2)(h) Rate and amount of dividends paid during the last five (5) previous fiscal years, and the amount of capital stock on which dividends were paid each year.**

**DIVIDENDS PER SHARE**

Year Ending	Per Share	Total	No. of Shares	Par Value of Stock
31-Dec-19	0	0	585,333	8,779,995
31-Dec-20	0	0	585,333	8,779,995
31-Dec-21	0	0	585,333	8,779,995
31-Dec-22	0	0	585,333	8,779,995
31-Dec-23	0	0	585,333	8,779,995

**(9) Section 12(2)(i) Detailed Income Statement and Balance Sheet.**

See the attached pages for a detailed Income Statement for the five months ended May 31, 2024 and a detailed Balance Sheet as of May 31, 2024.

**DUKE ENERGY KENTUCKY, INC.**  
**CONDENSED STATEMENTS OF OPERATIONS**  
(Unaudited)  
(In thousands)

Five Months Ended  
May 31  
2024

<b>Operating Revenues</b>	
Electric	197,850
Gas	71,385
<b>Total operating revenues</b>	<b>269,235</b>
<b>Operating Expenses</b>	
Fuel used in electric generation and purchased power	60,296
Natural gas purchased	27,125
Operation, maintenance and other	65,728
Depreciation and amortization	45,888
Property and other taxes	9,542
Goodwill and other impairment charges	-
<b>Total operating expenses</b>	<b>208,579</b>
<b>Gains on Sales of Other Assets and Other, net</b>	<b>96</b>
<b>Operating Income</b>	<b>60,752</b>
<b>Other Income and Expenses, net</b>	<b>3,365</b>
<b>Interest Expense</b>	<b>12,152</b>
<b>Income Before Income Taxes</b>	<b>51,965</b>
<b>Income Tax Expense</b>	<b>9,945</b>
<b>Income From Continuing Operations</b>	<b>42,020</b>
<b>Income From Discontinued Operations, net of tax</b>	<b>-</b>
<b>Net Income</b>	<b>42,020</b>

**DUKE ENERGY KENTUCKY, INC.**  
**Condensed Balance Sheets**  
**(Unaudited)**

(in thousands, except share amounts)	May 31, 2024
<b>ASSETS</b>	
<b>Current Assets</b>	
Cash and Cash Equivalents	2,317
Receivables (net of allowance for doubtful accounts)	67,051
Receivables from affiliated companies	90
Notes Receivables from affiliated companies	-
Inventory	70,175
Regulatory Assets	13,888
Other	9,303
<b>Total Current Assets</b>	<b>162,824</b>
<b>Property, Plant and Equipment</b>	
Cost	3,464,273
Less Accumulated Depreciation and Amortization	(1,164,515)
Generation Facilities To Be Retired	-
<b>Net Property Plant and Equipment</b>	<b>2,299,758</b>
<b>Other Noncurrent Assets</b>	
Regulatory Assets	107,742
Operating Lease Right-of-Use assets	5,660
Other	21,972
<b>Total Other Noncurrent Assets</b>	<b>135,374</b>
<b>Total Assets</b>	<b>2,597,956</b>
<b>LIABILITIES AND COMMON STOCKHOLDERS' EQUITY</b>	
<b>Current Liabilities</b>	
Accounts Payable	28,306
Accounts payable to affiliated companies	36,012
Notes payable to affiliated companies	30,268
Taxes Accrued	20,810
Interest Accrued	7,353
Current Maturities of Long-Term Debt	-
Asset Retirement Obligations	6,762
Regulatory Liabilities	13,152
Other	16,072
<b>Total Current Liabilities</b>	<b>158,735</b>
<b>Long-Term Debt</b>	<b>679,701</b>
<b>Notes payable to affiliated companies</b>	<b>25,000</b>
<b>Other Noncurrent Liabilities</b>	
Deferred Income Taxes	304,722
Asset Retirement Obligations	80,163
Regulatory Liabilities	104,727
Operating Lease Liabilities	5,812
Accrued Pension and Other Post-Retirement Benefit Costs	27,467
Other	23,548
<b>Total Other Noncurrent Liabilities</b>	<b>546,439</b>
<b>Commitments and Contingencies</b>	<b>-</b>
<b>Equity</b>	
Common Stock, \$15.00 par value, 1,000,000 shares authorized and 585,333 shares outstanding	8,780
Additional Paid in Capital	493,211
Retained Earnings	686,090
<b>Total Duke Energy Corporation Stockholders' Equity</b>	<b>1,188,081</b>
Noncontrolling Interests	-
<b>Total Liabilities and Equity</b>	<b>2,597,956</b>



Duke Energy Kentucky, Inc.  
139 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202

July 11, 2024

Commonwealth of Kentucky  
Energy and Environment Cabinet  
Department for Environmental Protection  
Division for Air Quality  
300 Sower Boulevard, 2<sup>nd</sup> Floor  
Frankfort, Kentucky 40601

RE: Duke Energy East Bend Station  
Agency Interest No: 176  
Title V Operating Permit: V-12-023  
Minor Permit Revision

Duke Energy Kentucky LLC, East Bend Station is proposing to convert the wet flue gas desulfurization (FGD) system from lime to limestone. The existing FGD process relies upon magnesium enhanced lime (MEL) to control SO<sub>2</sub> emissions. Recent issues with lime supply, quality, and price escalation pose additional risks to the East Bend Station from a reliability, compliance, and economic perspective. As a result, Duke Energy is proposing to convert the FGD system from lime to limestone, which will lower the operating cost and enhance unit reliability and compliance. The FGD process modifications will be designed to maintain an SO<sub>2</sub> removal efficiency of at least 98% for the design fuel.

The proposed project will require some minor changes to the existing reagent handling system, removal of some existing process equipment and the addition several new transfer points, a limestone pre-crusher, vertimill and a new wet scrubber.

#### **Minor Changes to Existing Equipment**

The existing unloading system, receiving hopper and main reagent storage silo will be repurposed for limestone. The existing unloading system will be equipped wear plates to accommodate limestone. Conveyors 1 and 3A will be equipped with restrictor plates on the tail end of conveyor to ensure the maximum hourly throughput capacity remains the same. Duke Energy is not proposing any changes to the hourly throughput or control devices associated with emitting units 14-01 thru 14-07 and 14-13 thru 14-16.

#### **New Equipment**

The proposed project will require installation of the following new equipment.

- 1) Two weigh belt feeders (WBFs) at the existing day bin discharge points.
- 2) One belt conveyor to transport limestone from the WBFs to the new reagent preparation system.
- 3) Pre-crusher to reduce the limestone to < ¼ inch.
- 4) Vertimill to grind the limestone down to achieve the final slurry.
- 5) One 29,000-gallon FGD buffer additive tank and feed pumps.
- 6) Modifications to the existing FGD scrubber to increase the liquid to gas ratio and improve the spray coverage.
- 7) Wet scrubber to control emissions from new emitting units associated with limestone handling.

A process flow diagram is included in **Attachment A**.



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Cincinnati, OH 45202

### **Removal of Existing Permitted Equipment**

Existing emitting units 14-8 thru 14-12 will be removed to accommodate the conversion of the FGD to limestone. Duke Energy will submit a separate request to remove this equipment once the limestone conversion project is completed. Emitting units 14-17 thru 14-23 are no longer in service and can be removed from the permit.

### **Emissions Quantification**

The particulate emissions from the following new limestone handling equipment will be controlled by a new wet scrubber.

- transfer of limestone from the day silo to the weigh belt feeders, identified as 14-26,
- transfer of limestone from the WBF to the conveyor 4A, identified as 14-27,
- transfer of limestone from conveyor 4A to the pre-crusher, identified as 14-28 and
- pre-crusher, identified as 14-29.

The wet scrubber will be designed to achieve compliance with the applicable PM emission standard from NSPS subpart OOO. The new vertimill is a wet process and will not be a source of particulate emissions. The potential to emit (PTE) for the new emitting units 14-26 thru 14-29 is included in **Attachment B Table 1**.

As a result of the project the PTE from the existing equipment will be revised to reflect the emission factors for limestone handling, which result in a lower particulate emission. The PTE calculations for the existing equipment identified as 14-01 thru 14-07 and 14-13 thru 14-16 are included in **Attachment B Table 2**.

### **Regulatory Review**

The following subsections discuss the applicability of regulatory requirements for the conversion of the FGD to limestone.

#### **Prevention of Significant Deterioration [401 KAR 51:017 and 40 CFR Part 52.21]**

The Prevention of Significant Deterioration (PSD) rule is applicable to the construction of new major sources and major modification at existing major sources for pollutants which are in attainment or unclassifiable for the National Ambient Air Quality Standards (NAAQS). East Bend is located in Campbell County Kentucky which is designated as attainment or unclassifiable for all criteria pollutants. Consequently, the proposed project was reviewed for applicability to the PSD rule. Since the project involves both new and existing equipment the project was evaluated for PSD applicability using a Hybrid Test.

For the new equipment the increase in emissions was based on the uncontrolled potential to emit (PTE). The PTE for the new equipment identified as 14-26 thru 14-29 was calculated using emissions factors from AP-42 section 11.19.2 for Crushed Stone Processing and Pulverized Mineral Processing assuming maximum operating capacity and continuous hours of operation.

For the existing coal fired boiler, identified as Unit 2, the emissions increase associated with the proposed project was determined using the past actual to future projected analysis. The past actual emissions, in tons per year, are the emissions the unit emitted during any consecutive 24-month period on a pollutant-by-pollutant basis within the 60-month baseline period. The baseline period starts on October 1, 2019, and ends on March 31, 2025. The future projected emissions in tons per year, are the projected actual emissions at which the unit emitted the pollutant during any consecutive 12-month period selected within





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the 60-month period immediately following the start of normal operation. The future projected emissions begin on January 1, 2027, and end on December 31, 2031.

The PSD regulation is applicable to projects which result in emissions increase which exceeds the PSD significance threshold, excluding demand growth. Demand growth is that portion of the unit's projected actual emissions that is unrelated to the particular project and due solely to the projected increase in utilization of the unit to meet customer demand.

Pollutants	SO2 (tons)	NOx (tons)	CO <sub>2e</sub> (tons)	VOC (Tons)	PM (tons)	PM2.5 (tons)	PM10 (tons)	PB (tons)	H <sub>2</sub> SO <sub>4</sub> (tons)	CO (tons)
Baseline	1,832.42	1,893.63	3,259,191.59	47.27	171.48	362.03	425.38	0.03	126.77	338.83
Future W - Limestone	1,801.07	1,746.54	3,649,814.70	53.09	43.36	366.53	383.01	0.03	131.00	380.60
Future W/O -Quicklime	1,061.22	991.56	2,150,547.71	31.32	25.58	216.21	225.93	0.02	77.27	224.51
Demand Growth (DG)	0	0	0	0	0	0	0	0	0	0
New Equipment <sup>1</sup>	-	-	-	-	2.21	0.40	0.87	-	-	-
Emissions Increase (EI)	-	-	390,623	6	-	4.90	-	-	4.22	42
EI - DG	-	-	390,623	6	-	4.90	-	-	4.22	42
Significant Emissions Threshold	40	40	75,000	40	25	10	15	0.6	7	100
PSD Applies	No	No	No	No	No	No	No	No	No	No
Reasonable Possibility Reporting	No	No	No	No	No	No	No	No	Yes	No

<sup>1</sup> Emission increase from new equipment is based on the uncontrolled potential to emit.

The PSD regulation is not applicable to this project since the emissions increase is below the PSD significant emissions rate for all NSR regulated pollutants, except for carbon dioxide equivalence (CO<sub>2e</sub>). CO<sub>2e</sub> is a measure of the total greenhouse gas emitted and was calculated using the equations in 40 CFR Part 98. CO<sub>2e</sub> is only subject to the PSD rule when the project is subject to PSD for another NSR regulated pollutant and the emission increase in CO<sub>2e</sub> exceeds the significant emissions threshold. Since the project does not trigger PSD for any other pollutant, PSD is not applicable to CO<sub>2e</sub>.

The reasonable possibilities recordkeeping and reporting requirements applies to projects which have an emission increase excluding demand growth which exceeds 50% of the significance emissions threshold, on a pollutant by pollutant basis. Since H<sub>2</sub>SO<sub>4</sub> exceeds the 50% of the significant emission threshold excluding demand growth, the proposed project triggers the reasonable possibilities reporting requirements for H<sub>2</sub>SO<sub>4</sub>. Pursuant to 40 CFR Part 52.21(r)(6)(v) and 401 KAR 51:017(16)(5), East Bend Generating Station will report the annual emissions of H<sub>2</sub>SO<sub>4</sub> for a period of 5 years following the resumption of normal operation after the change.

#### NSPS for Electric Utility Steam Generating Units 40 CFR Part 60 Subpart Da

The proposed project will not result in an increase in the maximum hourly emissions rate from Unit 2 for any pollutant regulated under subpart Da. Consequently, NSPS subpart Da is not being triggered because of this project.

#### NSPS for Nonmetallic Mineral Processing Plants, 40 CFR Part 60 Subpart OOO

The new conveyor/weight feeders, pre-crusher, and vertimill will be subject to NSPS subpart OOO, since this equipment is affected equipment pursuant to 60.670(a)(1) and is being constructed after effective date



Duke Energy Kentucky, Inc.  
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of 8/3/1983. The existing affected equipment being repurposed for limestone are not subject to NSPS Subpart OOO, since conversion to limestone will not result in an increase in the maximum hourly emission rate and this equipment was installed prior to 8/3/1983.

The following requirement under Subpart OOO are applicable.

- Pursuant to 40 CFR Part 60.672(a) the PM emissions from the wet scrubber, identified as C14-10, used to control emissions from 14-26 thru 14-30 will be subject to the PM emissions limit of 0.014 gr/dscf.
- Compliance shall be demonstrated based on an initial stack test to be conducted within 60 days of reaching maximum operating capacity but not longer than 180 days after initial startup using the procedures specified in 60.675(b).
- Pursuant to 40 CFR Part 60.674(a), the Permittee shall install, calibrate, maintain, and operate a continuous monitor the following monitoring devices on the wet scrubber identified as C14-10.
  - A device for the continuous measurement of the pressure loss of the gas stream through the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within  $\pm 250$  pascals  $\pm 1$  inch water gauge pressure and must be calibrated on an annual basis in accordance with the manufacturer's specification.
  - A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within  $\pm 5$  percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions.
- Pursuant to 40 CFR Part 60.676(c) during the initial performance test of a wet scrubber, and daily thereafter, the Permittee shall record the measurements of both the change in pressure of the gas stream across the wet scrubber and the scrubbing liquid flow rate.
- Pursuant to 40 CFR 60.676(d) and (e), after the initial performance test of the wet scrubber, the Permittee shall submit semiannual reports to the Administrator of occurrences when the measurements of the wet scrubber pressure loss and liquid flow rate decrease by more than 30 percent from the average determined during the most recent performance test. The reports shall be postmarked within 30 days following end of the second and fourth calendar quarters.
- Pursuant to 40 CFR 60.676(i), notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

#### **Requested Changes to the Title V Permit**

401 KAR 52:020, Section 14(3)(d), specifies that a modified version of the existing Title V permit with new text to reflect the proposed modification should be included with a minor revision application. This requirement is satisfied through the inclusion of the suggested permit in **Attachment C**.





Duke Energy Kentucky, Inc.  
139 E. 4<sup>th</sup> Street  
Cincinnati, OH 45202

#### Qualifications for Treatment as a Minor Permit Revision

This permit application seeks to revise the current Title V permit to reflect the installation as described in this application letter and its attachments. 401 KAR 52:020, Section 14 provides procedures for existing Title V sources to obtain minor permit revisions for modifications that meet certain criteria. An analysis of these criteria for this permit action is provided as follows:

- The proposed permit revision does not violate any applicable requirements contained within the existing Title V permit.
- The proposed permit revision does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit.
- The proposed permit revision does not require or change a case-by-case determination of an emission limit, a source-specific determination for temporary sources, or a visibility or increment analysis. No PSD avoidance limits are necessary for this project.
- The proposed permit revision does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement, and which the source has assumed to avoid an otherwise applicable requirement.

This permit action is not a modification under Title I of the Clean Air Act as this term is defined at 401 KAR 52:001 Section 1(52). Section 14(4) of 401 KAR 52:020 allows an applicant to proceed with the proposed modifications upon filing of an administratively complete minor revision application.

The application Forms DEP7007AI, 7007L, 7007N, 7007V and 7007GG are included in **Attachment D**.

Please contact Patrick Coughlin at 317-838-2108 if you should have any questions regarding this minor permit revision application.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the following documents are true, accurate, and complete.

Sincerely,

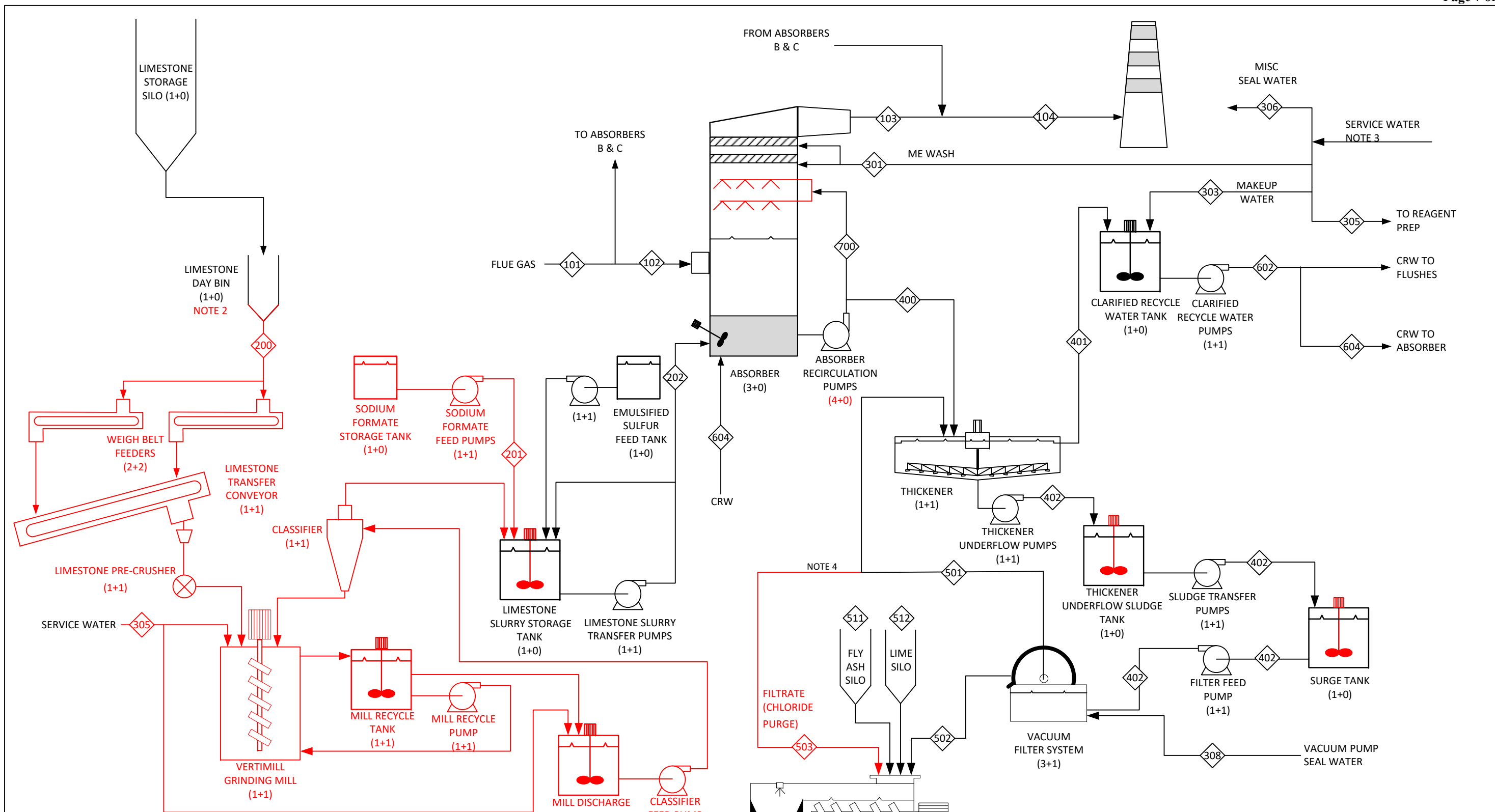
A handwritten signature in blue ink that reads "Brett Riggins".

Brett Riggins  
GM III – Regulated Stations

Enclosures

# Attachment A

## Process Flow Diagram



- NOTES:
1. RED DENOTES NEW EQUIPMENT REQUIRED FOR LIMESTONE CONVERSION.
  2. THE EXISTING DAY BIN WILL BE MODIFIED WITH FOUR OUTLETS FROM CURRENT EIGHT OUTLET CONFIGURATION. EACH OUTLET WILL FEED A NEW WEIGH BELT FEEDER SIZED FOR 50% CAPACITY OF THE SYSTEM. TWO WEIGH BELTS WILL FEED ONE TRANSFER CONVEYOR (1+1).
  3. NEW SERVICE WATER PUMP (1+1) WILL BE PROVIDED AS PART OF THE CONVERSION PROJECT.
  4. CHLORIDE PURGE WILL BE DRAWN FROM DISCHARGE PIPING OF FILTRATE PUMP UPSTREAM OF FILTRATE STORAGE TANK. FILTRATE TANKS AND PUMPS NOT SHOWN FOR CLARITY.

Proprietary Information – Subject to Duke Energy/AECOM Confidentiality Agreement

<b>AECOM</b>	
CLIENT / PROJECT NAME Duke Energy - East Bend Station WFGD Limestone Conversion Process Flow Diagram	PROJECT NO. 60680586
DRAWING NUMBER PFD - 101	DRAWING REVISION 0
	DATE June 08, 2022

# Attachment B

## Emissions Quantification

Attachement B  
Emissions Quantification

Table 1- Potential to Emit for existing units being re-purposed to handel Limestone.

Emission Unit ID	Description	Control Description	Stack ID	Control Device ID	Control Efficiency PM	Control Efficiency PM10/PM2.5	Potential to Emit Lime Operation							Potential to Emit Limestone Operation							Change In Potential to Emit from Lime to Limestone				
							PM lbs/ton	PM10 <sup>(a)</sup> lbs/ton	PM2.5 <sup>(b)</sup> lbs/ton	Emission Factor	Thurput ton/hr	PM tons/yr	PM10 tons/yr	PM2.5 tons/yr	PM lbs/ton	PM10 lbs/ton	PM2.5 lbs/ton	Emission Factor SCC#	Thurput ton/hr	PM tons/yr	PM10 tons/yr	PM2.5 tons/yr	PM tons/yr	PM10 tons/yr	PM2.5 tons/yr
ID: 14-01	Clamshell Unloader Digging from a Barge	Partial Enclosure	S14-01	Fugitive	90	81	2.2	1.1	1.1	3-05-016-15	600	578.16	549.25	549.25	0.003	0.0011	0.00007	3-05-020-06	600	0.788	0.734	0.035	-577.37	-548.52	-549.22
ID: 14-02	Clamshell Unloader to Receiving Hopper	Partial Encl & Baghouse	S14-02	C14-04	75	74.6	2.2	1.1	1.1	3-05-016-15	600	1445.40	734.26	734.26	0.003	0.0011	0.00007	3-05-020-06	600	1.971	0.043	0.047	-1443.43	-734.26	-734.26
ID: 14-03	Receiving Hopper to Belt Feeder	Baghouse	S14-02	C14-04	99	98.5	2.2	1.1	1.1	3-05-016-15	600	57.82	43.36	43.36	0.003	0.0011	0.00007	3-05-020-06	600	0.079	0.043	0.003	-57.74	-43.36	-43.36
ID: 14-04	Belt Feeder to Conveyor "1"	Baghouse	S14-02	C14-04	99	98.5	2.2	1.1	1.1	3-05-016-15	600	57.82	43.36	43.36	0.003	0.0011	0.00007	3-05-020-06	600	0.079	0.043	0.003	-57.74	-43.36	-43.36
ID: 14-05	Conveyor "1" to Unit 2 Main Silo	Baghouse	S14-03	C14-05	99	98.5	2.2	1.1	1.1	3-05-016-15	600	57.82	43.36	43.36	0.003	0.0011	0.00007	3-05-020-06	600	0.079	0.043	0.003	-57.74	-43.36	-43.36
ID: 14-06	Unit 2 Main Silo to Conveyor "3-A"	Baghouse	S14-04	C14-06	99	98.5	2.2	1.1	1.1	3-05-016-15	120	11.56	8.67	8.67	0.003	0.0011	0.00007	3-05-020-06	120	0.016	0.009	0.001	-11.55	-8.67	-8.67
ID: 14-07	Conveyor "3-A" to Day Bin (previously transferred to vibrating screen)	Baghouse	S14-05	C14-07	99	98.5	2.2	1.1	1.1	3-05-016-15	120	11.56	8.67	8.67	0.003	0.0011	0.00007	3-05-020-06	120	0.016	NA	0.001	-11.55	-8.67	-8.67
ID: 14-13	Dump Truck to Dumper House Hopper	Baghouse	S14-06	C14-08	99	98.5	2.2	1.1	1.1	3-05-016-15	25	2.41	1.81	1.81	0.003	0.0011	0.00007	3-05-020-06	25	0.003	0.002	0.000	-2.41	-1.80	-1.81
ID: 14-14	Hopper to Belt Feeder	Baghouse	S14-06	C14-08	99	98.5	2.2	1.1	1.1	3-05-016-15	25	2.41	1.81	1.81	0.003	0.0011	0.00007	3-05-020-06	25	0.003	0.002	0.000	-2.41	-1.80	-1.81
ID: 14-15	Belt Feeder to Conveyor "3"	Baghouse	S14-06	C14-08	99	98.5	2.2	1.1	1.1	3-05-016-15	25	2.41	1.81	1.81	0.003	0.0011	0.00007	3-05-020-06	25	0.003	0.002	0.000	-2.41	-1.80	-1.81
ID: 14-16	Conveyor "3" to Conveyor "3-A"	Baghouse	S14-04	C14-06	99	98.5	2.2	1.1	1.1	3-05-016-15	25	2.41	1.81	1.81	0.003	0.0011	0.00007	3-05-020-06	25	0.003	0.002	0.000	-2.41	-1.80	-1.81

Attachement B  
 Emissions Quantification

**Table 2 - Potential to Emit for new emission units for the conversion to Limestone.**

Emission Unit ID	Description	Control Description	Stack ID	Control Device ID	Control Efficiency PM <sup>(1)</sup>	Control Efficiency PM10/PM2.5 <sup>(1)</sup>	Emission Factors				Thurput ton/hr	Uncontrolled PTE			Controlled PTE		
							PM lbs/ton	PM10 lbs/ton	PM2.5 lbs/ton	Emission Factor SCC#		PM tons/yr	PM10 tons/yr	PM2.5 tons/yr	PM tons/yr	PM10 tons/yr	PM2.5 tons/yr
ID: 14-26	Transfer from day bin to wiegh belt feeders	Scrubber	S14-10	C14-10	90	90	0.003	0.0011	0.00007	3-05-020-06	35	0.460	0.169	0.011	0.0460	0.0169	0.0011
ID: 14-27	Transfer from wiegh belt feeders to belt conveyor 4A	Scrubber	S14-10	C14-10	90	90	0.003	0.0011	0.00007	3-05-020-06	35	0.460	0.169	0.011	0.0460	0.0169	0.0011
ID: 14-28	Transfer from conveyor 4A to pre-crusher	Scrubber	S14-10	C14-10	90	90	0.003	0.0011	0.00007	3-05-020-06	35	0.460	0.169	0.011	0.0460	0.0169	0.0011
ID: 14-29	Limestone pre-crusher	Scrubber	S14-10	C14-10	90	90	0.0054	0.0024	0.0024	3-05-030-03	35	0.828	0.368	0.368	0.0828	0.0368	0.0368
Total Emissions Increase, tons/yr												<b>2.21</b>	<b>0.87</b>	<b>0.40</b>	<b>0.22</b>	<b>0.09</b>	<b>0.04</b>

<sup>(1)</sup> Scrubber will be designed to achieve compliance with the NSPS Subpart OOO PM standard of 0.014 gr/dscf and was conservatively estimated to achieve 90% control efficiency for PM/PM10/PM2.5.

Attachment C  
Suggested Permit Conditions

Permit V-12-023 R1

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## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emissions unit: 14 (01-2529) - Lime Handling Operations (Fugitive Emissions)

### Description:

Equipment includes:

Emission Unit:	Description:	Process Rate (tons/hour):	Control Method:
14-01	Lime Barge Loader	600	Short Drop Heights
14-02	Lime Barge Unloader Hopper	600	Part Encl & Baghouse
14-03	Lime Hopper to belt Feeder	600	Total Encl & Baghouse
14-04	Belt Feeder to Conveyer 1	600	Total Encl & Baghouse
14-05	Conveyer 1 to Main Lime Silo	600	Total Encl & Baghouse
14-06	Main Lime Silo to Conveyer 3-A	120	Total Encl & Baghouse
14-07	Prior to conversion of FGD to limestone, conveyer 3-A to vibrating screen, after conversion of FGD to limestone conveyer 3-A to Day bin.	120	Total Encl & Baghouse
14-08	Vibrating Screen	120	Total Encl & Baghouse
14-09	Vibrating Screen to day Bin	120	Total Encl & Baghouse
14-10	Day bin to screw Conveyer	32	Total Encl & Baghouse
14-11	Screw Conveyer to vert-Mill	32	Total Encl & Baghouse
14-12	Lime Crushers (4)	32	Total Encl & Baghouse
14-13	Dump Crush Lime to Dumper House Hopper	25	Part Encl & Baghouse
14-14	Dumper House Hopper to belt Feed	25	Total Encl & Baghouse
14-15	Belt Feed to Conveyer 3	25	Total Encl & Baghouse
14-16	Conveyer 3 to Conveyer 3-A	25	Total Encl & Baghouse
14-17	Main Lime Silo to truck Loading	25	Total Enclosed
14-18	FGD Sludge Fix Plant Truck Dump	25	Part Encl & Baghouse
14-19	Sludge Fix Plant to Lime crusher	25	Total Encl & Baghouse
14-20	Lime Crusher (4)	25	Total Encl & Baghouse
14-21	Lime Crusher to Belt Feeder	25	Total Encl & Baghouse
14-22	Belt Feeder to Sludge Fix Plant Lime Conveyer	25	Total Encl & Baghouse
14-23	Sludge Fix Plant Lime Conveyer to Lime Silo	25	Total Encl & Baghouse
14-24	FGD Plant Lime Tanker Unload	75	Total Encl & Baghouse
14-25	FGD Plant Lime Silo	75	Total Encl & Baghouse
14-26	Day Bin to Weigh Feeders	35	Total Encl & Scrubber
14-27	Weigh Feeder to Conveyer 4	35	Total Encl & Scrubber
14-28	Conveyer 4 to Pre-crusher	35	Total Encl & Scrubber
14-29	Limestone Pre-crusher	35	Total Encl & Scrubber

Construction commenced: 1976

### Applicable Regulations:

401 KAR 63:010, Fugitive emissions

401 KAR 60:005, New Source Performance Standards for Nonmetallic Mineral Processing Plant

401 KAR 51:017, Prevention of significant deterioration of air quality



Permit V-12-023 R1

Page 2 of 71

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****1. Operating Limitations:**

- a) Reasonable precautions shall be taken to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, when applicable, but not be limited to the following [401 KAR 63:010, Section 3]:
1. Application and maintenance of asphalt, application of water, or suitable chemicals on roads, material stockpiles, and other surfaces which can create airborne dusts;
  2. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials, or the use of water sprays or other measures to suppress the dust emissions during handling.
  3. The maintenance of paved roadways in a clean condition;
  4. The prompt removal of earth or other material from a paved street which earth or other material has been transported thereto by trucking or other earth moving equipment or erosion by water.
- b) No person shall cause or permit the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate [401 KAR 63:010, Section 3].
- c) No one shall allow earth or other material being transported by truck or earth moving equipment to be deposited onto a paved street or roadway [401 KAR 63:010, Section 4].
- d) Upon completion of the conversion of the FGD from lime to limestone, emission units 14-08 thru 14-12 will be decommissioned and emission unit 14-07 will transfer limestone from conveyor 3-A directly to the Day bin.

**2. Emission Limitations:**

Upon completion of the conversion of the FGD from lime to limestone the following emission limit shall apply.

- a) The scrubber identified as C14-10 used to control particulate emissions from the emitting units 14-26 and 14-29 is subject to the PM emissions limit of 0.014 gr/dscf. [40 CFR Part 60.672(a)]

**3. Testing Requirements:**

Upon completion of the conversion of the FGD from lime to limestone stack tests for particulate matter on scrubber C14-10 shall be conducted within 60 days of reaching maximum operating capacity but not longer than 180 days after initial startup. [40 CFR 60.672(a) and 40 CFR 60.675(b)].

**4. Specific Monitoring Requirements:**

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**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

The Permittee shall install, calibrate, maintain, and operate the following monitoring devices on the wet scrubber identified as C14-10. [40 CFR Part 60.674(a)]

- a) a device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within  $\pm 250$  pascals  $\pm 1$  inch water gauge pressure and must be calibrated on an annual basis in accordance with the manufacturer's specification.
- b) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within  $\pm 5$  percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions.

**5. Specific Record Keeping Requirements:**

- a) During the initial performance test of a wet scrubber, and daily thereafter, the Permittee shall record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate. [40 CFR 60.676(c)]
- b) Records of the lime and limestone received and processed (tonnages) shall be maintained on a weekly basis for emission inventory purposes [401 KAR 52:020, Section 10].

**6. Specific Reporting Requirements:**

- a) After the initial performance test of the scrubber, the Permittee shall submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss and liquid flow rate decrease by more than 30 percent from the average determined during the most recent performance test. The reports shall be postmarked within 30 days following end of the second and fourth calendar quarters. [40 CFR 60.676(d) and (e)]
- b) A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available. [40 CFR 60.676(i)]

Refer to **Section F, Monitoring, Recordkeeping and Reporting Requirements.**

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**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**7. Specific Control Equipment Operating Conditions:**

1. Watering shall be used to maintain compliance with applicable requirements, in accordance with standard operating practices [401 KAR 63:010].
2. Records regarding the maintenance and use of the control measures in Subsection 7(a) shall be maintained [401 KAR 52:020, Section 10].
3. Refer to **Section E, Source Control Equipment Requirements.**

Attachment D  
Permit Application Forms

11/2018

DEP7007AI

<p style="text-align: center;">Division for Air Quality</p> <p style="text-align: center;">300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999</p>	<p><b>DEP7007AI</b></p> <p><b>Administrative Information</b></p> <p><input type="checkbox"/> Section AI.1: Source Information</p> <p><input type="checkbox"/> Section AI.2: Applicant Information</p> <p><input type="checkbox"/> Section AI.3: Owner Information</p> <p><input type="checkbox"/> Section AI.4: Type of Application</p> <p><input type="checkbox"/> Section AI.5: Other Required Information</p> <p><input type="checkbox"/> Section AI.6: Signature Block</p> <p><input type="checkbox"/> Section AI.7: Notes, Comments, and Explanations</p>	<p style="text-align: center;"><b>Additional Documentation</b></p> <p style="text-align: center;"><input type="checkbox"/> Additional Documentation attached</p>																				
<p><b>Source Name:</b> <u>Duke Energy Kentucky LLC, East Bend Station</u></p> <p><b>KY EIS (AFS) #:</b> <u>21- 015-00029</u></p> <p><b>Permit #:</b> <u>V-12-023</u></p> <p><b>Agency Interest (AI) ID:</b> <u>176</u></p> <p><b>Date:</b> <u>11-Jul-24</u></p>																						
<p><b>Section AI.1: Source Information</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"><b>Physical Location</b></td> <td style="width: 15%;"><b>Street:</b></td> <td colspan="3"><u>6293 Beaver Road</u></td> </tr> <tr> <td><b>Address:</b></td> <td><b>City:</b></td> <td><u>Union</u></td> <td><b>County:</b> <u>Boone</u></td> <td><b>Zip Code:</b> <u>40191</u></td> </tr> <tr> <td><b>Mailing Address:</b></td> <td><b>Street or P.O. Box:</b></td> <td colspan="3"><u>6293 Beaver Road</u></td> </tr> <tr> <td></td> <td><b>City:</b></td> <td><u>Union</u></td> <td><b>State:</b> <u>Kentucky</u></td> <td><b>Zip Code:</b> <u>40191</u></td> </tr> </table>			<b>Physical Location</b>	<b>Street:</b>	<u>6293 Beaver Road</u>			<b>Address:</b>	<b>City:</b>	<u>Union</u>	<b>County:</b> <u>Boone</u>	<b>Zip Code:</b> <u>40191</u>	<b>Mailing Address:</b>	<b>Street or P.O. Box:</b>	<u>6293 Beaver Road</u>				<b>City:</b>	<u>Union</u>	<b>State:</b> <u>Kentucky</u>	<b>Zip Code:</b> <u>40191</u>
<b>Physical Location</b>	<b>Street:</b>	<u>6293 Beaver Road</u>																				
<b>Address:</b>	<b>City:</b>	<u>Union</u>	<b>County:</b> <u>Boone</u>	<b>Zip Code:</b> <u>40191</u>																		
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b>	<u>6293 Beaver Road</u>																				
	<b>City:</b>	<u>Union</u>	<b>State:</b> <u>Kentucky</u>	<b>Zip Code:</b> <u>40191</u>																		
<p><b>Standard Coordinates for Source Physical Location</b></p> <p><b>Longitude:</b> <u>38.904</u> (decimal degrees)      <b>Latitude:</b> <u>-84.851</u> (decimal degrees)</p>																						
<p><b>Primary (NAICS) Category:</b> <u>Electric Power Generation</u>      <b>Primary NAICS #:</b> <u>22111</u></p>																						

<b>Classification (SIC) Category:</b>		<u>Electric Power Generation</u>	<b>Primary SIC #:</b>	<u>4931</u>
<b>Briefly discuss the type of business conducted at this site:</b>		<u>Electric Generating Utility</u>		
<b>Description of Area Surrounding Source:</b>	<input checked="" type="checkbox"/> Rural Area	<input type="checkbox"/> Industrial Park	<input type="checkbox"/> Residential Area	<b>Is any part of the source located on federal land?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Area	<input type="checkbox"/> Commercial Area	
<b>Approximate distance to nearest residence or commercial property:</b>		<u>2200 feet (estimated)</u>	<b>Property Area:</b>	<u>1777 acres</u>
				<b>Is this source portable?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?</b>				
<b>NPDES/KPDES:</b>	<input checked="" type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input type="checkbox"/> N/A	
<b>Solid Waste:</b>	<input checked="" type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input type="checkbox"/> N/A	
<b>RCRA:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>UST:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>Type of Regulated Waste Activity:</b>	<input type="checkbox"/> Mixed Waste Generator	<input type="checkbox"/> Generator	<input type="checkbox"/> Recycler	<input checked="" type="checkbox"/> Other: _____
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Transporter	<input type="checkbox"/> Treatment/Storage/Disposal Facility	<input type="checkbox"/> N/A

7AI

11/2018

DEP7007AI

<b>Section AI.2: Applicant Information</b>	
<b>Applicant Name:</b>	Duke Energy Kentucky Inc., East Bend Station
<b>Title:</b> (if individual)	
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> 6293 Beaver Road
	<b>City:</b> Union <b>State:</b> Kentucky <b>Zip Code:</b> 40191
<b>Email:</b> (if individual)	
<b>Phone:</b>	
<b>Technical Contact</b>	
<b>Name:</b>	Patrick Coughlin
<b>Title:</b>	Environmental Specialist
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> 1000 East Main St.
	<b>City:</b> Plainfield <b>State:</b> Indiana <b>Zip Code:</b> 46168
<b>Email:</b>	patrick.coughlin@duke-energy.com
<b>Phone:</b>	317-838-2108
<b>Air Permit Contact for Source</b>	
<b>Name:</b>	Patrick Coughlin
<b>Title:</b>	Environmental Specialist
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> 1000 East Main St.
	<b>City:</b> Plainfield <b>State:</b> Indiana <b>Zip Code:</b> 46168
<b>Email:</b>	patrick.coughlin@duke-energy.com
<b>Phone:</b>	317-838-2108

11/2018

DEP7007AI

<b>Section AI.3: Owner Information</b>	
<input checked="" type="checkbox"/> <b>Owner same as applicant</b>	
<b>Name:</b>	_____
<b>Title:</b>	_____
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> _____
	<b>City:</b> _____ <b>State:</b> _____ <b>Zip Code:</b> _____
<b>Email:</b>	_____
<b>Phone:</b>	_____
<b>List names of owners and officers of the company who have an interest in the company of 5% or more.</b>	
<b>Name</b>	<b>Position</b>
_____	_____
_____	_____
_____	_____



11/2018

DEP7007AI

**Section AI.4: Type of Application**

**Current Status:**  Title V  Conditional Major  State-Origin  General Permit  Registration  None

Name Change  Initial Registration  Significant Revision  Administrative Permit Amendment

**Requested Action:**  Renewal Permit  Revised Registration  Minor Revision  Initial Source-wide Operating Permit  
*(check all that apply)*

502(b)(10)Change  Extension Request  Addition of New Facility  Portable Plant Relocation Notice

Revision  Off Permit Change  Landfill Alternate Compliance Submittal  Modification of Existing Facilities

Ownership Change  Closure

**Requested Status:**  Title V  Conditional Major  State-Origin  PSD  NSR  Other: \_\_\_\_\_

**Is the source requesting a limitation of potential emissions?**  Yes  No

<b>Pollutant:</b>	<b>Requested Limit:</b>	<b>Pollutant:</b>	<b>Requested Limit:</b>
<input type="checkbox"/> Particulate Matter	_____	<input type="checkbox"/> Single HAP	_____
<input type="checkbox"/> Volatile Organic Compounds (VOC)	_____	<input type="checkbox"/> Combined HAPs	_____
<input type="checkbox"/> Carbon Monoxide	_____	<input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F)	_____
<input type="checkbox"/> Nitrogen Oxides	_____	<input type="checkbox"/> Carbon Dioxide	_____
<input type="checkbox"/> Sulfur Dioxide	_____	<input type="checkbox"/> Greenhouse Gases (GHG)	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Other	_____

**For New Construction:**

**Proposed Start Date of Construction:** (MM/YYYY) \_\_\_\_\_ 03/2025

**Proposed Operation Start-Up Date:** (MM/YYYY) \_\_\_\_\_ 01/2027

**For Modifications:**

**Proposed Start Date of Modification:** (MM/YYYY) \_\_\_\_\_ 03/2025

**Proposed Operation Start-Up Date:** (MM/YYYY) \_\_\_\_\_ 01/2027

**Applicant is seeking coverage under a permit shield.**  Yes  No

**Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.**

**Section AI.5 Other Required Information**

Indicate the documents attached as part of this application:

- |  |   |
|--|---|
| <input type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines                        | <input type="checkbox"/> DEP7007CC Compliance Certification                       |
| <input type="checkbox"/> DEP7007B Manufacturing or Processing Operations                       | <input type="checkbox"/> DEP7007DD Insignificant Activities                       |
| <input type="checkbox"/> DEP7007C Incinerators and Waste Burners                               | <input type="checkbox"/> DEP7007EE Internal Combustion Engines                    |
| <input type="checkbox"/> DEP7007F Episode Standby Plan   | <input type="checkbox"/> DEP7007FF Secondary Aluminum Processing                  |
| <input type="checkbox"/> DEP7007J Volatile Liquid Storage                                      | <input checked="" type="checkbox"/> DEP7007GG Control Equipment                   |
| <input type="checkbox"/> DEP7007K Surface Coating or Printing Operations                       | <input type="checkbox"/> DEP7007HH Haul Roads                                     |
| <input checked="" type="checkbox"/> DEP7007L Mineral Processes                                 | <input type="checkbox"/> Confidentiality Claim                                    |
| <input type="checkbox"/> DEP7007M Metal Cleaning Degreasers                                    | <input type="checkbox"/> Ownership Change Form                                    |
| <input checked="" type="checkbox"/> DEP7007N Source Emissions Profile                          | <input type="checkbox"/> Secretary of State Certificate                           |
| <input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems                       | <input checked="" type="checkbox"/> Flowcharts or diagrams depicting process      |
| <input type="checkbox"/> DEP7007R Emission Offset Credit                                       | <input type="checkbox"/> Digital Line Graphs (DLG) files of buldings, roads, etc. |
| <input type="checkbox"/> DEP7007S Service Stations   | <input type="checkbox"/> Site Map   |
| <input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations               | <input type="checkbox"/> Map or drawing depicting location of facility            |
| <input checked="" type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activities | <input type="checkbox"/> Safety Data Sheet (SDS)                                  |
| <input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination     | <input type="checkbox"/> Emergency Response Plan                                  |
| <input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units        | <input type="checkbox"/> Other: _____   |
| <input type="checkbox"/> DEP7007BB Certified Progress Report                                   |   |

**Section AI.6: Signature Block**

I, the undersigned, hereby certify under penalty of law, that I am a responsible official\*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

  
 \_\_\_\_\_  
 Authorized Signature

7/15/2024  
 \_\_\_\_\_  
 Date

Brett Riggins  
 \_\_\_\_\_  
 Type or Printed Name of Signatory

GM III- Reg Stations  
 \_\_\_\_\_  
 Title of Signatory

\*Responsible official as defined by 401 KAR 52:001.



11/2018

Division for Air Quality  300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	<b>DEP7007N</b> Source Emissions Profile ___ Section N.1: Emission Summary ___ Section N.2: Stack Information ___ Section N.3: Fugitive Informator ___ Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Additional Documentation</th> </tr> <tr> <td style="text-align: center;">___ Complete DEP7007AI</td> </tr> </table>	Additional Documentation	___ Complete DEP7007AI
Additional Documentation				
___ Complete DEP7007AI				
<b>Source Name:</b> <u>Dueke Energy Kentucky LLC., East Bend Generating Station</u>				
<b>KY EIS (AFS) #:</b> <u>21- 015-00029</u>				
<b>Permit #:</b> <u>V-12-23 R1</u>				
<b>Agency Interest (AI) ID:</b> <u>176</u>				
<b>Date:</b> <u>8-Jul-24</u>				

**N.1: Emission Summary**

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
14	Transfer from day bin to weigh belt feeders	26	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM	0.003	AP-42 Section 11.19.2	100%	90%	0.105	0.01050	0.460	0.0460
14	Transfer from day bin to weigh belt feeders	26	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM10	0.0011	AP-42 Section 11.19.2	100%	90%	0.039	0.00385	0.169	0.0169
14	Transfer from day bin to weigh belt feeders	26	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM2.5	0.00007	AP-42 Section 11.19.2	100%	90%	0.002	0.00025	0.011	0.0011
14	Transfer from weigh belt feeders to belt conveyor 4A	27	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM	0.003	AP-42 Section 11.19.2	100%	90%	0.105	0.01050	0.460	0.0460
14	Transfer from weigh belt feeders to belt conveyor 4A	27	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM10	0.0011	AP-42 Section 11.19.2	100%	90%	0.039	0.00385	0.169	0.0169
14	Transfer from weigh belt feeders to belt conveyor 4A	27	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM2.5	0.00007	AP-42 Section 11.19.2	100%	90%	0.002	0.00025	0.011	0.0011
14	Transfer from conveyor 4A to pre-crusher	28	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM	0.003	AP-42 Section 11.19.2	100%	90%	0.105	0.01050	0.460	0.0460
14	Transfer from conveyor 4A to pre-crusher	28	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM10	0.0011	AP-42 Section 11.19.2	100%	90%	0.039	0.00385	0.169	0.0169
14	Transfer from conveyor 4A to pre-crusher	28	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM2.5	0.00007	AP-42 Section 11.19.2	100%	90%	0.002	0.00025	0.011	0.0011

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Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
14	Limestone precrusher	29	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM	0.0054	AP-42 Section 11.19.2	100%	90%	0.189	0.01890	0.828	0.0828
14	Limestone precrusher	29	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM10	0.0024	AP-42 Section 11.19.2	100%	90%	0.084	0.00840	0.368	0.0368
14	Limestone precrusher	29	Limestone Handling	Wet Scrubber	C14-10	S14-10	35	PM2.5	0.0024	AP-42 Section 11.19.2	100%	90%	0.084	0.00840	0.368	0.0368

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<b>Section N.2: Stack Information</b>									
<b>UTM Zone:</b>									
Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
S14-10	14-26, 14-27, 14-28 and 14-29	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD







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Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

**DEP7007GG**  
Control Equipment

**Additional Documentation**

- Complete Sections GG.1 through GG.12, as applicable
- Attach manufacturer's specifications for each control device
- Complete DEP7007AI

**Source Name:** Duke Energy Kentucky LLC., East Bend Generating Station

**KY EIS (AFS) #:** 21- 015-00029

**Permit #:** V-12-023

**Agency Interest (AI) ID:** 176

**Date:** 8-Jul-24

**Section GG.1: General Information - Control Equipment**

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers Only			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature ( <sup>o</sup> F)	Flowrate (scfm @ 68 <sup>o</sup> F)	Average Particle Diameter (μm)	Particle Density (lb/ft <sup>3</sup> ) or Specific Gravity	Gas Density (lb/ft <sup>3</sup> )	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H <sub>2</sub> O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
C14-10	TBD	TBD	TBD	TBD	TBD	ambient	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	90%

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<b>Section GG.11: Other Control Equipment</b>		
<b>Control Device ID #</b>	<b>Identify all Emission Units and Control Devices that Feed to Control Equipment</b>	<b>Type of Control Equipment (provide description and a diagram with dimensions)</b>
C14-10	14-26, 14-27, 14-28 and 14-29	Wet Scrubber

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<b>Section GG.12: Notes, Comments, and Explanations</b>
Scrubber will be designed to achieve compliance with the NSPS Subpart OOO PM standard of 0.014 gr/dscf and was conservatively estimated to achieve 90% control efficiency for PM/PM10/PM2.5.

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Division for Air Quality  300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	<b>DEP7007L</b> <b>Mineral Processes</b> <input type="checkbox"/> Section L.1: Source Operating Information <input type="checkbox"/> Section L.2: Concrete Operations <input type="checkbox"/> Section L.3: Asphalt Operations <input type="checkbox"/> Section L.4: Coal Operations <input type="checkbox"/> Section L.5: Aggregate Processing Operations <input type="checkbox"/> Section L.6: Feed, Corn, and Flour Operations <input type="checkbox"/> Section L.7: Grain Elevators <input type="checkbox"/> Section L.8: Fertilizer Operations <input type="checkbox"/> Section L.9: Notes, Comments, and Explanations	<b>Additional Documentation</b> <input type="checkbox"/> Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG. <input type="checkbox"/> Attach flow diagram
<b>Source Name:</b> <u>Duke Energy Kentucky LLC. East Bend Generating Station</u>		
<b>KY EIS (AFS) #:</b> <u>21- 015-00029</u>		
<b>Permit #:</b> <u>V-12-023 R1</u>		
<b>Agency Interest (AI) ID:</b> <u>176</u>		
<b>Date:</b> <u>8-Jul-2024</u>		
<b>Section L.1: Source Operating Information</b>		
<b>Type of Plant:</b> <input type="checkbox"/> Concrete <input type="checkbox"/> Asphalt <input type="checkbox"/> Coal <input type="checkbox"/> Fertilizer <input type="checkbox"/> Feed Corn Flour <input type="checkbox"/> Grain Elevators <input checked="" type="checkbox"/> Aggregate Processing		
<b>Operating Schedule:</b> <span style="border: 1px solid black; padding: 2px 10px;">24</span> Hours/Day: <span style="border: 1px solid black; padding: 2px 10px;">7</span> Days/Week: <span style="border: 1px solid black; padding: 2px 10px;">52</span> Weeks/Year:		
<b>Percent Annual Throughput:</b> Dec.-Feb.: <u>25</u> %    Mar.-May: <u>25</u> %    Jun.-Aug.: <u>25</u> %    Sep.-Nov.: <u>25</u> %		
<b>Maximum Rated Source Capacity:</b> <u>35</u> tons/hour <u>306,600</u> tons/year		

<b>Combustion Equipment:</b>	
<b>Is there a generator located on site?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Is it possible for the generator to remain at one site longer than twelve months?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Is there a hot water heater located on site?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Is there a dryer located on site?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Is there a hot oil heater (asphalt heater) located on site?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Describe briefly the disposal of particulates collected in the baghouse and/or other waste generated at the site:</b>	The existing lime handling equipment will repurposed to handle limestone 14-1 thru 14-7, 14-13 thru 14-16, 14-24 and 14-25. New limestone process/handling equipment identified as units 14-26 thru 14-30 will be installed.
<b>Is there additional information attached to support the data required in this form?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Brief description of additional information included: <u>flow diagram, draft language, emissions calculations</u>	
Total number of additional pages, including drawings, maps, and diagrams: <u>39 pages</u>	

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**Section L.5: Aggregate Processing Operations**

**New Source Performance Standard Applicability**

Are any emission units for the operation subject to:  NSPS, Subpart OOO  None  Other: \_\_\_\_\_

**Complete the Table:**

Emission Unit #	Affected Facility	Maximum Rated Capacity		Control Method or Equipment	Control Efficiency (% removal)	SCC Code	Pollutant	Emission Factor (lb/SCC unit)	Source of Emission Factor	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Installation Date of Each Unit	Is the Unit Subject to NSPS? (Yes or No)
		(tons/hr)	(tons/yr)									
14-26	Transfer Limestone from day bin to weigh belt feeders	35	306600	Scrubber	90	30502006	PM	lb/ton	AP-42	25-Mar	NA	Yes
14-27	Transfer of Limestone from weigh belt feeder to conveyor 4A	35	306600	Scrubber	90	30502006	PM	lb/ton	AP-42	25-Mar	NA	Yes
14-28	Transfer of Limestone from conveyor 4A to pre-crusher	35	306600	Scrubber	90	30502006	PM	lb/ton	AP-42	25-Mar	NA	Yes
14-29	Pre-crusher	35	306600	Scrubber	90	305003003	PM	lb/ton	AP-42	25-Mar	NA	Yes

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<p style="text-align: center;"><b>Division for Air Quality</b></p> <p style="text-align: center;">300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999</p>	<p><b>DEP7007V</b></p> <p><b>Applicable Requirements and Compliance Activities</b></p> <p><input type="checkbox"/> Section V.1: Emission and Operating Limitation(s)</p> <p><input type="checkbox"/> Section V.2: Monitoring Requirements</p> <p><input type="checkbox"/> Section V.3: Recordkeeping Requirement:</p> <p><input type="checkbox"/> Section V.4: Reporting Requirements</p> <p><input type="checkbox"/> Section V.5: Testing Requirements</p> <p><input type="checkbox"/> Section V.6: Notes, Comments, and Explanations</p>	<p style="text-align: center;"><b>Additional Documentation</b></p> <p><input type="checkbox"/> Complete DEP7007AI</p>					
<p><b>Source Name:</b> <u>Duke Energy Kentucky LLC. East Bend Generating Station</u></p> <p><b>KY EIS (AFS) #:</b> <u>21- 015-00029</u></p> <p><b>Permit #:</b> <u>V-12-023 R1</u></p> <p><b>Agency Interest (AI) ID:</b> <u>176</u></p> <p><b>Date:</b> <u>8-Jul-24</u></p>							
<p><b>Section V.1: Emission and Operating Limitation(s)</b></p>							
<p style="text-align: center;"><b>Emission Unit #</b></p>	<p style="text-align: center;"><b>Emission Unit Description</b></p>	<p style="text-align: center;"><b>Applicable Regulation or Requirement</b></p>	<p style="text-align: center;"><b>Pollutant</b></p>	<p style="text-align: center;"><b>Emission Limit (if applicable)</b></p>	<p style="text-align: center;"><b>Voluntary Emission Limit or Exemption (if applicable)</b></p>	<p style="text-align: center;"><b>Operating Requirement or Limitation (if applicable)</b></p>	<p style="text-align: center;"><b>Method of Determining Compliance with the Emission and Operating Requirement(s)</b></p>
14-26 thru 14-29	New Limestone Handling	60.672(a), 60.674(a)	PM	0.014 gr/dscf			Method 5

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<b>Section V.2: Monitoring Requirements</b>					
<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Monitored</b>	<b>Description of Monitoring</b>
14-26,14-27, 14-28 and 14-29	Limestone Handling and pre-crusher	PM	60.674(a)(1)	Monitor pressure across the scrubber	Continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within $\pm 250$ pascals $\pm 1$ inch water gauge pressure and must be calibrated on an annual basis in accordance with the manufacturer's specification.
14-26,14-27, 14-28 and 14-29	Limestone Handling and pre-crusher	PM	60.674(a)(2)	Monitor scrubber liquid flow rate	Continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within $\pm 5$ percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions.

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<b>Section V.3: Recordkeeping Requirements</b>					
<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Recorded</b>	<b>Description of Recordkeeping</b>
14-26, 14-27, 14-28 and 14-29	Limestone Handling and pre-crusher	PM	60.676(b)	Daily pressure change across the scrubber and scrubber liquid flow rate.	



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<b>Section V.4: Reporting Requirements</b>					
<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Reported</b>	<b>Description of Reporting</b>
14-26,14-27, 14-28 and 14-29	Limestone Handling Pre-crusher	NA	60.676(i)	Date of initial startup	Notification of actual startup The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
14-26,14-27, 14-28 and 14-29	Limestone Handling Pre-crusher	PM	60.676(d)(e)	Change in pressure across the scrubber and scrubber liquid flow rate	Submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss and liquid flow rate decrease by more than 30 percent from the average determined during the most recent performance test .
Unit 2	Coal Fired Boiler	H <sub>2</sub> SO <sub>4</sub>	401 KAR 51:017(16)(5) 40 CFR Part 52.21(r)(6)(v)	Annual emissions of H <sub>2</sub> SO <sub>4</sub>	Report annual emissions of H <sub>2</sub> SO <sub>4</sub> within 60 days after the end of the calendar year for a period of 5 years following resumption of normal operation after the change.

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<b>Section V.5: Testing Requirements</b>					
<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Tested</b>	<b>Description of Testing</b>
14-26, 14-27, 14-28 and 14-29	Limestone Handling and Pre-crusher	PM	60.674(c)	PM	





# Duke Energy East Bend Station

Wet FGD Conversion to a Limestone Inhibited-Oxidation  
Process  
Preliminary Engineering Report

Duke Energy

Project number: 60724995

July 12, 2024

### Quality information

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Project Engineer

**Checked by**

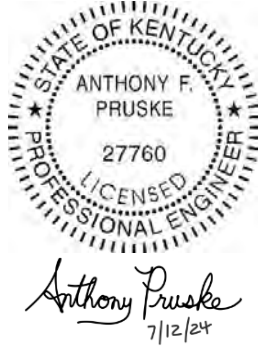
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Business Development  
Director



### Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	March 25, 2024	Issued for Permitting	Yes	Gray	Business Development Director
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2	April 29, 2024	Issued for Permitting	Yes	Gray	Business Development Director
3	July 12, 2024	Issued for Permitting	Yes	Gray	Business Development Director

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Duke Energy East Bend Station

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## 1. Introduction and Project Basis

### 1.1 Project Basis

Duke Energy's East Bend Station currently operates a wet flue gas desulfurization (FGD) process that relies upon magnesium-enhanced lime (MEL) to control SO<sub>2</sub> emissions. However, the expenses associated with lime reagent, stabilization additives and disposal of the waste sludge produced by the process result in very high FGD operating costs which adversely affect the competitiveness of the East Bend Station in today's power markets. Furthermore, recent issues with lime supply, quality, and price escalation pose additional risks to the East Bend Station from a reliability, compliance, and economic perspective.

As a result, Duke Energy approached AECOM to assess the technical feasibility of converting the FGD system to use lower-cost limestone reagent in an inhibited oxidation process (LSIO) while still meeting all environmental and reliability requirements, and whether the required capital investment is economically justified.

### 1.2 Project Background

AECOM completed a Phase 1 Engineering Study (the Study) in 2022 which evaluated the technical and economic feasibility of converting the East Bend FGD system to a LSIO process. The Study identified the required scope items to convert the East Bend FGD system from MEL operation to LSIO operation, which are detailed in Section 3.

The Study report included the design basis, scope, and assumptions for a complete conversion of the existing FGD system to LSIO operation. The following preliminary documents formed the basis for the project scope:

- Process design basis, PRISM modeling, material balances, and process flow diagrams (PFDs),
- P&IDs,
- General arrangements, equipment layouts, and Power Distribution Center (PDC) arrangement,
- Equipment list, load list, one-line diagrams, and net IO summary,
- Contract and procurement approach,
- EPC schedule, and
- Class 3 cost estimate.

### 1.3 Objectives

The objectives of the Study were to determine the technical requirements, capital investment, and operating cost savings associated with converting the East Bend wet FGD process to LSIO operation. The Study established the following preliminary information:

- Design basis for the FGD conversion from MEL to LSIO,
- Process modifications to existing systems,
- Major equipment and infrastructure for new systems,
- System and equipment arrangements and configurations,
- Project schedule,
- Cost estimate, and
- Contract and procurement approach.

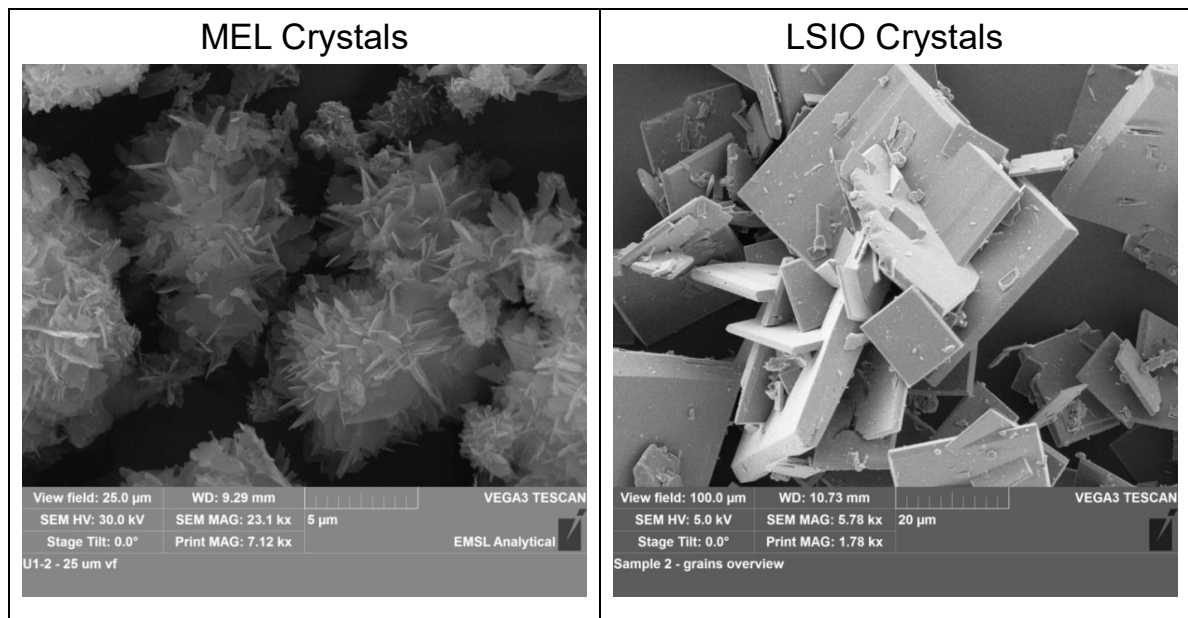


## 2. Technology Overview

The Wet FGD system at East Bend uses MEL scrubbing technology, which relies on pebble quicklime containing a small fraction of dolomite as the reagent. Dolomite is comprised of about 50% magnesium oxide which, when added to the absorber with the lime reagent, dissolves and promotes elevated concentrations of sulfite. Sulfite is an effective source of liquid-phase alkalinity, which facilitates high SO<sub>2</sub> removal efficiency for boilers firing high sulfur coal. The primary benefit of scrubbing with MEL is that the required absorber recycle slurry pumping capacity is lower than limestone-based FGD systems – typically in the range of 40 to 50 gallons per 1,000 cubic feet of treated flue gas – and results in smaller pumps with lower power requirements.

A key disadvantage of the MEL technology is the production of calcium sulfite (CaSO<sub>3</sub>) solids that are typically difficult to dewater. As a result, significant quantities of fly ash and lime must be added to the filtered solids to produce a stable product suitable for disposal in a landfill. Conversion to LSIO chemistry will improve the dewatering properties of the calcium sulfite solids by creating larger, more regular, and symmetric crystals. A comparison of calcium sulfite crystals produced by MEL and LSIO scrubbing is provided in Figure 2-1.

Figure 2-1: Comparison of Crystal Shapes from MEL and LSIO FGD Systems



The FGD waste solid crystals in the left image were collected from an MEL FGD system of similar design and vintage to East Bend; oxidation was approximately 11%. The irregular shape of the crystals causes them to trap water between the solids such that dewatering is not easily achieved. The FGD waste solid crystals in the right image were collected from another utility that converted from MEL to LSIO operation. Due to the sulfite oxidation inhibiting properties of thiosulfate and sodium formate, oxidation in that unit was approximately 5%. The flatter, cubic, and larger LSIO crystals enable more efficient water removal from between the solid crystals in the slurry. As a result of the LSIO conversion at East Bend, a significant improvement in dewatering characteristics of the FGD solids is expected, resulting in much drier filter cake, less water landfilled, and reduced fixation lime requirements.

Another disadvantage of note with MEL scrubber technology is the loss of liquid-phase alkalinity due to oxidation of sulfite to sulfate during periods of low load operation or if an FGD absorber is out of service. Liquid-phase alkalinity must be re-established when load increases or the system is returned to service before the FGD process can achieve required efficiency. The degradation in performance has become a greater concern as more coal-fired units operate at lower capacity factors in the current market while emission limits and compliance requirements become more stringent.

The following process modifications are needed to convert an existing MEL scrubber to LSIO operation:

- **Reagent Unloading.** Due to differences in their molecular weight, more limestone by mass is required than MEL to scrub the same quantity of SO<sub>2</sub>. Further, the bulk density of limestone is roughly double the bulk density of lime. As a result, the existing reagent unloading and material handlings systems, designed for MEL, often require modification to accommodate new operating conditions and higher density material.
- **Reagent Preparation.** The reagent preparation system for a MEL scrubber consists of a lime slaking device. Generally, slakers cannot be repurposed to grind limestone to the required fineness due to overall mechanical configuration issues or capacity issues. New grinding mills are often required to produce the necessary quantity and quality of reagent slurry sufficient for the FGD process. New equipment enclosures or enclosure additions are also often required to house the new grinding systems.
- **Liquid-phase Alkalinity.** Liquid-phase alkalinity provides the main driving force for SO<sub>2</sub> removal in MEL scrubber systems. Limestone scrubbers rely predominately on solid-phase alkalinity with dissolution of limestone in the absorber replenishing alkalinity to facilitate SO<sub>2</sub> scrubbing. Due to this fundamental difference, MEL scrubbers require less interaction between the scrubber liquor and flue gas to achieve the required removal efficiency and are designed to operate at lower liquid-to-gas (L/G) ratios. To compensate for this difference while minimizing the capital investment associated with increasing the L/G, a performance additive such as sodium formate (NaFo) is used to provide equivalent alkalinity following an LSIO conversion. However, since performance additives will not degrade in the slurry as the reaction tank sits idle during outages and can also be added directly to the scrubbers following an outage in which the absorber reaction tanks are drained, the FGD system is able to maintain consistent SO<sub>2</sub> removal performance under all operating scenarios.
- **Mist Eliminator Wash System.** The mist eliminator (ME) wash systems for MEL scrubbers were typically designed as general flush systems to remove slurry carryover from the front surfaces of the ME stages to prevent accumulation of calcium sulfite. However, the slurry carryover in LSIO FGD slurry also contain residual limestone solids that react with SO<sub>2</sub> remaining in the flue gas passing through the ME. As such, the ME wash system for a limestone based FGD system should be more robust in design with respect to wash intensity (gpm/ft<sup>2</sup>) and wash pressure to provide effective removal of the FGD slurry from the ME surfaces.

### 3. Project Scope and Design Information

AECOM developed a preliminary design and layout for the conversion of the East Bend FGD process to LSIO operation. This section provides a general overview of the design basis and preliminary design for the system. Preliminary drawings are included in the appendices of this report.

#### 3.1 Design Basis

The FGD process modifications are designed to maintain an SO<sub>2</sub> removal efficiency of at least 98% for the design fuel (5.66 lb SO<sub>2</sub> / MMBtu). Table 3-1 provides key design basis inputs.

**Table 3-1: Preliminary Design Basis**

Parameter	Unit	Value
Site Elevation	Ft above MSL	515
Number of Generating Units	-	1
Unit Load, Net	MW	600
Unit Heat Rate, Net	Btu/kWh	10,760
Unit Heat Input	MMBtu/hr	6,456
Annual Capacity Factor	%	69
Coal Heating Value	Btu/lb	11,778
Coal Ash Content	wt%	9.02
Fly Ash Portion of Total Ash	% by weight	80
Coal Sulfur Content	%-wet	3.20
SO <sub>2</sub> Removal Requirement (Design)	%	98
Lime Reagent CaO Purity	%	90.3
Limestone CaCO <sub>3</sub> Purity	%	92
Limestone size (received)	-	1"x0
Limestone size (product)	-	90% passing 325 mesh

#### 3.2 Scope Overview

The LSIO conversion project scope includes modifications to existing equipment and is based on the turnkey delivery, including engineering, procurement, and construction. The conversion of the East Bend FGD system to LSIO operation involves several process, equipment, and system changes including:

- Minor modifications to reagent receiving, conveying, and storage systems.
- Installation of new reagent feeders and conveying equipment.
- Installation of new limestone pre-crushers and grinding mills.
- Refurbishment and resheaving of absorber recycle pumps.
- Installation of new absorber recycle slurry piping, cross-tie piping, spray headers, and spray nozzles.
- Operation of all absorber recycle slurry pumps to enhance SO<sub>2</sub> removal performance.
- Modification of the absorber trays to enhance SO<sub>2</sub> removal performance.
- Installation of a buffer additive storage and feed system to enhance SO<sub>2</sub> removal performance.
- Replacement of existing emulsified sulfur storage tank and feed system to improve system reliability and inhibit sulfite oxidation.

- Upgrade of mist eliminator wash water supply system.
- Replacement of waste slurry storage tank, thickener underflow sludge tank, and lime slurry tank agitators.
- Installation of a filtrate purge system to control process chloride levels.

### 3.3 System Descriptions and Scope

#### 3.3.1 Material Handling System

The material handling system includes infrastructure and equipment required for the receiving, unloading, conveying, processing, and storage of the limestone reagent (currently magnesium-enhanced lime). Limestone will be received by barge at the barge unloading area where it is offloaded and then conveyed to the storage silo area. From here, the limestone will be conveyed to the day bin area where it will be temporarily stored for distribution to the reagent prep system by way of a new belt conveyor system.

1. Limestone Flowability Studies will be performed on the Unloading Hopper, Storage Silo, modified Day Bin, and the pre-crusher outlet chute. The primary objective of the studies is to confirm the assumption that no geometry modifications are required on the Unloading Hopper or the Storage Silo, guide the detail design on the Day Bin outlet modifications, and provide design parameters for the pre-crusher outlet chute.
2. Barge Unloading Area – The existing barge unloader and unloading hopper will be repurposed for limestone service. The following modifications are planned at the barge unloading area:
  - a. Install a new, smaller, barge unloading clamshell bucket to account for the higher density of limestone and stay within the system design parameters.
  - b. Modify existing 30-day storage silo inlet chute to extend below maximum fill level for level control.
3. Storage Silo Area – The existing lime storage silo will be repurposed for limestone service. The following modifications will be performed at the storage silo:
  - a. Install a profile plate on the tail end of Conveyor 3A to limit the conveyor's limestone tonnage throughput to match the existing lime throughput on the conveyor.
  - b. The high-level alarm(s) setpoint will be lowered so that the weight capacity of the existing silo is not exceeded due to the higher density of the limestone (relative to lime) stored in the silo. The existing level transmitter and cabling will be reused.
  - c. Demolish existing metal detector and install a new manual magnetic separator at the head end of LH1.
4. Day Bin Area – The following modifications will be made to convert the existing lime day bin to limestone service:
  - a. A new feed chute on the discharge of Conveyor 3A will be installed down to the day bin. The chute will be equipped with AR liners.
  - b. Bin Outlet Modifications – The eight existing day bin outlets will be modified to four discharge points. Outlet slopes will be equipped with AR liners. Design of the modifications to the bottom of the bin to accommodate the new discharge points will take into consideration the need to reduce the allowable storage volume of the bin to prevent exceeding the weight capacity of the equipment.
  - c. Four new weigh belt feeders (WBFs) will be installed at the day bin discharge points. Each WBF will be equipped with a slide gate to isolate the WBF from the day bin material. Each limestone material handling train (two trains total) will be equipped with two 100% WBFs, one operating and one spare.
  - d. Supplemental steel and platform modifications will be designed and provided for new WBF installations.
  - e. The high-level alarm(s) setpoints will be lowered so that the weight capacity of the existing day bin is not exceeded due to the higher density limestone being stored in the day bin. The existing level transmitter and cabling will be reused.
5. Limestone Conveying System – A new belt conveyor system will be installed to transport limestone from the WBFs to the new reagent preparation system. The conveying system includes:

- a. Two 24" wide belt conveyors (one per train) that collect material from the discharge of the WBFs and feed it into the limestone preparation system. The conveyors will be equipped with a walkway on both sides and have ladder access to the WBF deck. The conveying systems will be equipped with manual screw take-ups on the tail pulleys and a tramp metal detection system that is interlocked with the transfer conveyors to prevent damage to the pre-crushing and grinding systems.
  - b. New AR lined chutes will be installed between the WBFs and the transfer conveyors. New AR lined chutes will be installed at the discharge of the transfer conveyor and feed into the reagent preparation system.
  - c. Limestone transfer points (WBF discharge, transfer conveyor discharge) and the pre-crusher will have connections to a new dust collection system.
  - d. Supplemental steel will be designed and installed to support the limestone conveying and tensioning system.
  - e. Foundations will be installed for some conveyor support structures that cannot be supported from building steel.
6. Instrumentation and Controls – New control devices for the material handling system that will be installed include:
- a. Conveyor belt control devices will include pullcord switches the full length of the transfer conveyor, belt misalignment switches, and zero speed switches. The weigh belt feeders will include scales, VFDs, other devices to control limestone feed rate and devices to protect the weigh belt feeders.
  - b. New chutes will be equipped with plugged chute switches.
  - c. The new dust collector system will include level switches and automated valves for cleaning the new dust collection system.
7. Cabling and Raceways – New cables and raceways will be installed to energize and control new equipment.
- a. Power cabling will be installed from a new 480V lineup in the new limestone grinding building to new conveying system equipment.
  - b. New instrument and control cabling will be installed from material handling equipment to a new RIO cabinet in the new Power Distribution Center (PDC).
  - c. New cable trays will be installed for power, instrument, and control cabling. Metal conduit and flex conduit will be used for final drops to equipment and other end users.
  - d. Supplemental steel for raceway supports will be designed and installed.
  - e. Foundations for raceway support steel will be installed at grade.
8. Demolition – The existing metal detector at the top of the 30-day lime silo will be removed. The day bin vibrating screen (and associated chute work), day bin bottoms, lime screw feeders, and the day bin outlet gates will be removed to accommodate the new limestone conversion equipment. Penetrations will be made on the existing reagent preparation building for transfer conveyor access. Other equipment no longer used and not interfering with the new equipment will be abandoned in place.

### 3.3.2 Reagent Prep System

The reagent prep system includes unit operations for crushing and grinding limestone received from the material handling system. The limestone received will first pass through a pre-crusher system where the product will be crushed before it is sent to the limestone grinding system. From the pre-crushing system, the pre-crushed product will be sent to Vertimills for final slurry product sizing. Final slurry product will be stored in the existing lime transfer storage tank.

1. Limestone Pre-crushing System – Two 100% pre-crushing systems will be installed to size the limestone down to an acceptable top size for the grinding systems (<1/4"). The pre-crushing system is summarized below:
  - a. A pre-crusher will be installed between each limestone transfer conveyor (two pre-crushers total) and each grinding system.



- a. A new double wall 29,000-gallon shop fabricated FRP tank will be provided for storing FGD system additive. The tank will be located indoors in the existing slaker building. The tank will include a heating system and insulation installed to maintain a product temperature of 100 deg F.
  - b. A new pump skid equipped with two 100% capacity 1.2 gpm positive displacement chemical pumps will be installed indoors in the adjacent slaker building. The additive pumps will pump the FGD additive to the existing lime/limestone slurry storage tank. The pumps will be heat traced and equipped with removable blanket insulation.
  - c. New 304 SS tubing from the additive storage tank up to the existing limestone slurry storage tank will be installed. Approximately 100' of new 3/8" SS tubing will be designed and installed. The piping system will include manual valves, check valves, heat tracing, insulation, and pipe supports.
  - d. Foundations for the new additive tanks, pumps, pipe supports, and raceways will be designed and installed.
  - e. A truck unloading system will be installed to fill the additive tank. It is assumed the tank will be close enough to the unloading station so that the tank truck pumps can be used for filling the new additive tank. The unloading station will be equipped with an eyewash station and containment system. The containment will be equipped with manual drain valve and HDPE piping to drain storm water into the existing reagent preparation building trench system.
  - f. Area lighting and convenience power at the FGD Additive system is included. Local panels for distributing power, lighting, and heat tracing will be installed.
  - g. Supplemental steel for pipe and raceway supports will be provided. An allowance of 5 tons of supplemental steel is included in the design.
4. Instrumentation and Controls – New instrumentation, control devices, and automated valves will be installed for the new reagent preparation systems.
- a. Instrumentation to monitor, control, and protect the pre-crushing and grinding process equipment will be provided.
  - b. New instrumentation will be provided to monitor the additive tank levels and temperatures. The additive feed pumps will include remote start capabilities.
  - c. A new remote I/O (RIO) cabinet will be installed in the PDC. The new RIO cabinet will interface with the existing DCS via a fiber optic link. An allowance for 500' of fiber optic cable for interfacing with the existing DCS is included in the design.
5. Power Supply – The power supply to the reagent preparation area will be fed from spare compartments in the existing 4160V lineups (24SR-1 and 24SR-2) to support the new power supply system, the following scope will be performed.
- a. Electrical studies (load flow, short circuit analysis, relay coordination, and arc flash) will be performed to support detail design and engineering activities. New arc flash labeling will be provided where personnel protection levels are higher than existing labeling.
  - b. Two spare 4160V compartments will be utilized to energize each reagent handling and preparation system. Two compartments will be utilized from 24SR-1 and two spare compartments will be utilized from 24SR-2. One of the compartments on each existing lineup will be utilized to power a 1000HP VTM motor and the other compartment will feed a 4160V x 480V transformer that will supply the remaining power distribution requirements in the reagent handling and preparation areas. Each 4160V compartment (four compartments total) will have new 4160 breakers and SEL relays installed (feeder protection or motor protection as required).
  - c. The 480V and under power distribution system will be installed in a prefabricated Power Distribution Center (PDC) to be located adjacent the new VTM enclosure. The primary lineup will include outdoor 4160V x 480V liquid filled step down transformers and an open transition tie breaker between each train's 480V equipment. Transformers will be installed per NEC code and applicable regulations (e.g., fire detection/protection). The low voltage power distribution system will include LV MCCs, load centers, and lighting panels. The PDC will be equipped with HVAC, lighting, convenience outlets, and two doors.

- d. New foundations for the transformers will be installed. The PDC will sit on elevated piers to allow for bottom entry and exit of cabling.
6. Cabling and Raceways – New cables and raceways will be installed to energize, monitor, and control new equipment that will be installed. Connections to the existing plant ground grid are included.
  - a. Medium voltage power cabling will be installed overhead from the FGD electrical room to the new PDC. The VTM motor cables will be routed overhead in the new VTM enclosure. Low voltage (LV) duct banks will be installed from the transformers to the PDC and from the PDC to the VTM enclosure. Low voltage power cabling will be installed from the PDC to the new reagent handling equipment, the new reagent preparation area users, and the FGD Additive system. A new ground grid will tie into the existing grid.
  - b. New instrument and control cabling will be installed from reagent preparation area equipment to a new RIO cabinet in the PDC.
  - c. New cable trays will be installed for power, instrument, and control cabling. Metal conduit and flex conduit will be used for final drops to equipment and other end users.
  - d. Supplemental steel for raceway supports will be designed and installed.
  - e. Foundations for raceway support steel will be installed at grade.
7. Demolition – The existing reagent preparation building will be cleaned of lime dust accumulations. The Lime slurry tank agitator and two tank baffles will be removed.

### 3.3.3 FGD Area

The recycle slurry system receives the limestone slurry product from the reagent prep system where it is sprayed into the absorbers for SO<sub>2</sub> removal. Recycle slurry pumps recycle the limestone slurry in a closed loop spray tower. Absorber trays installed in the cross-section of the towers create pressure drop (dP) for enhanced SO<sub>2</sub> removal as the limestone slurry collected on these trays passes through the perforations in the tray.

The mist eliminator system installed above the recycle slurry spray nozzles is designed to remove carryover (moisture) from the exiting flue gas. The mist eliminator system includes an integrated wash header system designed to clean the surfaces of the mist eliminators with wash water.

1. Recycle Slurry System – To achieve the desired SO<sub>2</sub> removal objectives, the following modifications will be made to increase the system L/G ratio and overall absorber slurry spray coverage.
  - a. Absorber recycle pump refurbishments (overhaul) to restore pumps to like-new conditions. Modifications (e.g., resheaving) to recycle pumps to optimize flow and pressure on the lower spray headers. Automated flush controls will be added for the recycle pumps.
  - b. Two new 316L spray headers will be installed on each module (six headers total). The main inlet trunk diameter will be 30" and each header will be equipped with 128 silicon carbide slurry nozzles. A new 30" 316L penetration spool will be provided for each header.
  - c. A new 316L internal support truss will be designed and installed to support the lower recycle header trunk. The existing truss will be used to support the upper recycle header trunk. New 316L box beam supports will be designed and installed for the upper and lower header branches.
  - d. The existing 20" external recycle piping will be replaced with 30" FRP piping and a new cross-tie (manifold) to allow four pumps to feed both spray elevations. New pipe supports are included.
  - e. Supplemental steel for the new external recycle piping supports will be designed and installed.
  - f. New 316L absorber tray dP taps will be installed on each absorber (six taps total) so that the tray dP can be manually measured during system startup. The taps will be 2" diameter and will include a manual ball valve.
  - g. 316L strips of 11-gauge sheet metal will be welded onto the existing tray to reduce the open area of tray surface. The strips will be installed as evenly/symmetrically as possible across the tray surface to promote even gas/liquid distribution.





5. Cabling and Raceways – New cables and raceways will be installed to energize, monitor, and control new equipment that will be installed. Connections to the existing plant ground system are included.
  - a. New cabling will be installed for the service water pump recirculation valves and the pressure transmitter.
  - b. Cabling for the service water pump recirculation (automated valves and pressure transmitter) will be ran in new conduit.
6. Power supply – Existing service water pump cabling will be reused based on the one-line drawing (SLD20D27) stating the existing infrastructure is designed for 250 HP. If additional cabling is necessary to access pump motor terminations, a junction box and new power and control cabling will be installed (no cable splices).
7. Demolition – The existing 316L recycle headers, penetration nozzles, and internal box beams will be removed from the absorbers. Portions of the external FRP recycle piping (20" diameter sections) will be removed along with associated pipe supports and supplemental steel. The 5" ME wash piping, flow meters, and automated valves will be removed to accommodate the new 6" ME wash piping. The 248 ME wash riser extensions on the "C" module upper wash header will be removed. The existing service water pumps and recirculation restriction orifices will be removed. The existing ME wash water blending station valves and piping will be demolished and the CRW and service water piping reworked to make room for the two new Lakos filters and Zero Gravity filter pods.

### 3.3.4 Dewatering Area

Solids accumulated in the absorber tower sumps are pumped to the dewatering area for removal from the FGD system by means of two-step dewatering. Primary dewatering is achieved by means of a thickener which receives the slurry blowdown from the FGD area. Solids accumulated in the center well of the thickener (thickener underflow) are pumped to the secondary dewatering area and the thickener overflow is collected in the CRW tank.

Secondary dewatering is achieved by means of drum filters. Thickener underflow is first received and stored in the existing WSP surge tank, then pumped to drum filters for dewatering. The filter cake is stabilized in existing pugmills where the filter cake is blended with fly ash, lime, and water from a chloride purge stream. Final blended cake is disposed of consistent with current operations.

1. Primary Dewatering – The primary dewatering will be modified as below for the conversion to limestone reagent.
  - a. The existing FGD Sludge Tank (thickener underflow tank) mixer will be replaced with a new agitator. The agitator oil pump will be a shaft driven style oil pump to allow for agitator lubrication when the agitator is required to operate on essential power.
  - b. The existing mixer support structure will be reinforced with additional supplemental steel and two baffles will be installed in the tank.
  - c. The thickener underflow pump controls will be modified to facilitate consistent, automatic control of the underflow slurry density at the desired operational setpoint.
  - d. The lining system of the FGD Sludge Tank will be replaced with a flake glass lining.
  - e. Automated flush control valves will be added for flushing the thickener underflow pumps and piping.
2. Secondary Dewatering – The secondary dewatering system will be modified as below for reagent conversion project.
  - a. The existing WSP Surge Tank mixer will be replaced with a new agitator.
  - b. The existing mixer support structure will be reinforced with additional supplemental steel and two baffles will be installed in the tank.
  - c. New 316L chloride purge piping will be installed on the discharge of each filtrate pump (four pumps total). The piping will be manifolded together and routed to a new chloride purge spray bar at the pug mill for blending with waste disposal product material. Each purge line will be equipped with an automated valve and a downstream block valve. Approximately 140' of 2.5" and 60' of 1.5" piping will be installed.

3. Instrumentation and Controls
  - a. The following devices will be installed as part of the chloride purge addition: A new automated valve will be installed in the discharge piping of each of the four existing filtrate pumps (four valves total). A flow meter will be installed to control a modulating valve on the chloride purge header to the pug mill.
  - b. Eight new automated valves and associated piping will be installed as part of the absorber density using CRW.
4. Power Supply, Cabling and Raceways – New motor starters, cables, and raceways will be installed to energize, monitor, and control new equipment that will be installed.
  - a. Space in existing dewatering area MCCs (thickener and WSP) will be configured for Size 4 MCC buckets to power the new dewatering area agitators. The WSP MCC will not require any loads to be relocated to accommodate a size 4 bucket. The thickener area MCC will require relocating some loads to accommodate a size 4 bucket. New size 4 starters will be provided. New power and control cabling will be installed from the new motor starters to new agitators.
  - b. New instrument and control cables will be installed for the new chloride purge devices and the CRW density control.
  - c. New raceways will be installed for power, instrument, and control cabling. Metal conduit and flex conduit will be used for final drops to end users.
  - d. Supplemental steel will be designed and installed for the new cable trays.
5. Demolition – The Sludge Tank Mixer and the WSP Surge Tank Mixers will be removed to accommodate the new agitators.

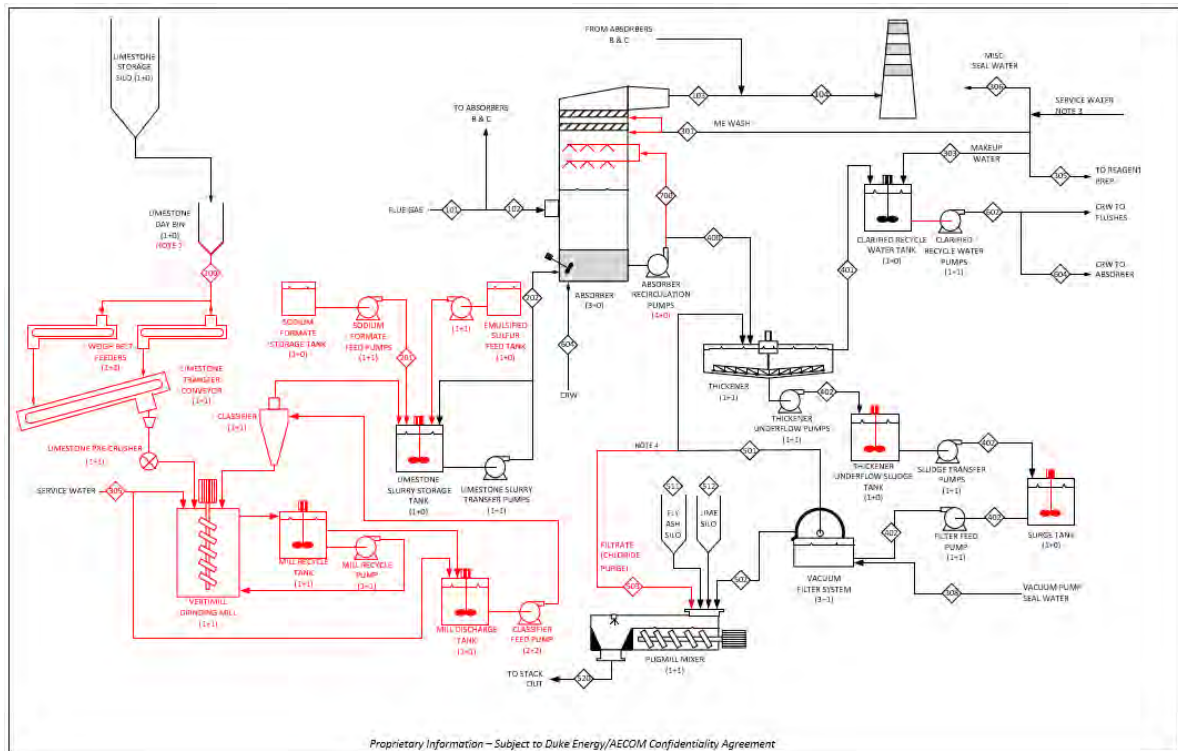
### 3.3.5 Balance of Plant (BOP)

1. A laser scan will be performed of selected project areas to optimize pipe routing and equipment arrangements.
2. A geotechnical investigation will be performed in the area of the new vertical milling system to identify the foundation design requirements for this area.
3. An English Language Control Description (ELCD) for the DCS supplier (Emerson – Ovation) to make programming changes to existing systems and programming for new systems.

## 4. System Operations

The concept AECOM developed for LSIO operation reuses some existing equipment and infrastructure where possible to minimize the capital cost associated with a process retrofit. A process flow diagram (PFD) of the proposed configuration is provided in Figure 4-1. The process lines and equipment in red represent new scope and construction items. All other process lines and equipment in black reflect existing equipment or piping that will be reused or repurposed. The PFD with associated material balance for limestone operation is provided as Appendix B.

Figure 4-1: Limestone Inhibited Oxidation (LSIO) Process Flow Diagram

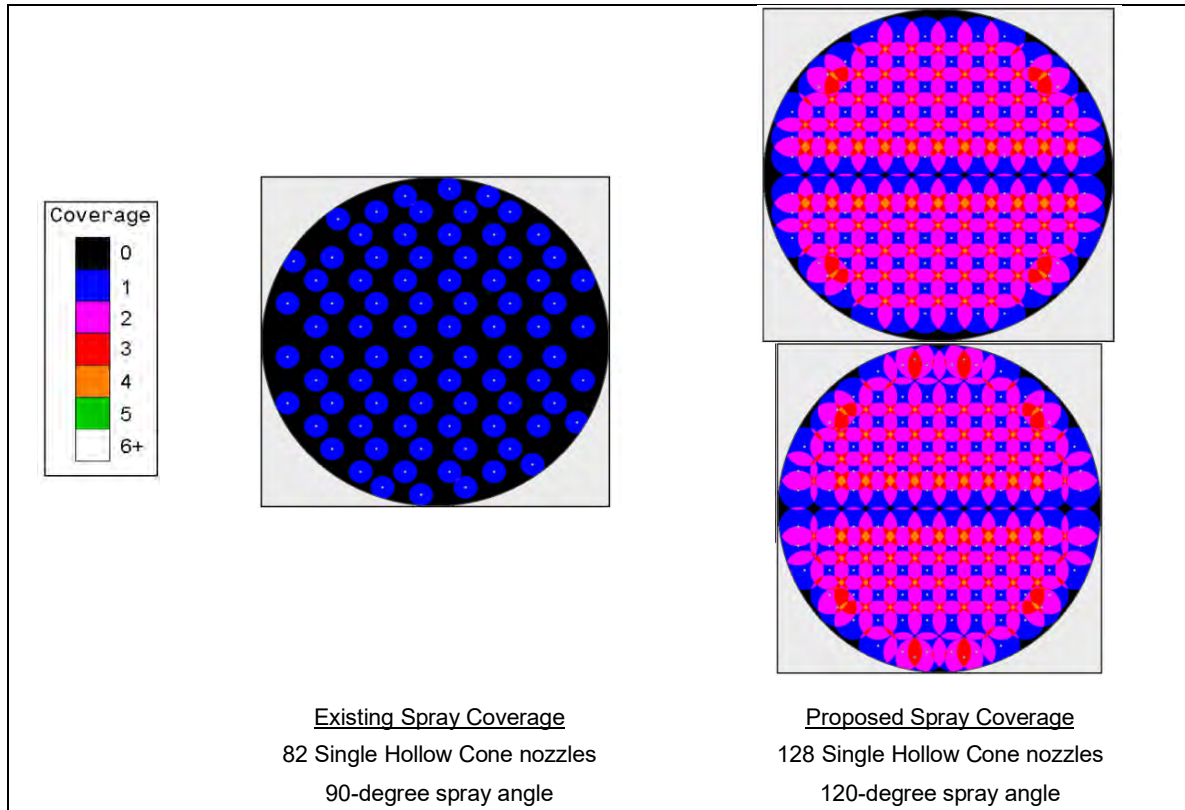


### 4.1 LSIO Operation

LSIO operation will require an increase in L/G to achieve the desired  $\text{SO}_2$  removal efficiency of 98% without requiring excessively high sodium formate usage. All four of the existing slurry pumps will operate at an approximate flow of 12,500 gpm each (50,000 gpm total per absorber) to achieve an L/G of 64 gal/kacf. Modifications to pump speed via new belts and sheaves and modifications to the existing recycle piping to reduce system friction losses will be required to allow the existing pumps to achieve these flows.

New spray headers designed with improved spray coverage will be installed to distribute the slurry over the absorber cross section at each of the two existing spray levels. Comparison of the existing spray coverage to the proposed new spray coverage is illustrated in Figure 4-2. The images represent spray coverage at 18-inches below the nozzles. A schematic of the new spray header design is provided in Appendix A. Tray strips will also be added to the existing tray to achieve a pressure drop across the tray of approximately 3.0 IWG at design conditions. Improvements to spray coverage and an increase in tray pressure drop will both provide mass transfer benefits that appropriately balance capital investments with operational expenditures.

Figure 4-2: Current Versus Proposed Absorber Recycle Spray Pattern



Calcium sulfite solids will continue to be produced with LSIO operation. These solids will be purged from the individual reaction tanks based on density feedback control to target 15% suspended solids in the reaction tanks rather than the current control scheme that uses tank level as the control variable. To maintain slurry velocity in the existing bleed piping, the bleed will operate on a batch rather than continuous basis at roughly the same flow rate. The existing bleed valves will open when a high density set point has been reached in the reaction tank and will remain open until a low density setpoint has been achieved. The bleed piping will be flushed with clarified recirculating water (CRW) after the bleed valve has closed. At full load operation, the bleed will operate for approximately 20 minutes of every hour. The existing density meters will be used to control the batch bleed process. Tank level will be used to control the addition of CRW as makeup to the reaction tank.

The solids purged from the reaction tank will be transported in the existing bleed piping to the thickeners for primary dewatering. Consistent with current operations, overflow from the thickener will be collected in the CRW tank along with FGD system makeup water. The thickener will be operated such that the underflow slurry contains nominally 30% suspended solids. The underflow will be collected in the existing thickener underflow (TUF) sludge tanks for subsequent transfer via the waste slurry processing (WSP) sludge tank to the drum filters. The improved dewatering properties of the sodium sulfite solids associated with the LSIO conversion (as described in Section 2.0) will result in improved performance for the drum filters. Based on LSIO conversions at other facilities, AECOM predicts the drum filter cake to contain nominally 65% solids. The existing filtrate pumps that transfer filtrate to the filtrate storage tank appear to have marginal capacity for the increased filtrate production associated with the reduced cake moisture. AECOM will perform an assessment during detailed design, but at this time assumes the filtrate pumps have adequate capacity for the new duty. As such, the only modifications necessary for the secondary dewatering system are replacement agitators in the TUF and WSP Sludge Tanks to keep the more readily dewatered calcium sulfite solids in suspension. Operation with 2 or 3 drums in service will continue, dependent upon cleaning and maintenance schedules.

Stabilization operations will continue with use of the existing pugmill to combine filter cake from the drum filters with fly ash and lime. A chloride purge stream will be added to the pugmill to control chlorides within FGD system metallurgical limits. A slipstream of drum filter filtrate will be diverted to the pugmill and distributed via spray bar to promote mixing with the filter cake, lime, and fly ash. AECOM estimates a chloride purge flow of approximately 75 gpm will be required to maintain FGD system chloride concentration below 7,000 ppm. The blended cake will be collected and disposed consistent with current operations.

## 4.2 Reagent Prep and Storage

The existing barge unloading system will undergo minor modification to be repurposed for limestone unloading. The existing lime conveyance equipment and storage silos will also undergo modifications to be repurposed for limestone handling and storage.

The existing vertical ball mill slaking system will be demolished. New feeders and transfer conveyors will transport limestone rock to a new grinding building constructed to the southeast of the existing slaker building. A new pre-crusher will reduce the size of the incoming limestone to 80% passing 5 mesh (4.25mm); the resulting product will gravity feed new vertical ball mills (VTMs). The VTMs are designed to reduce the size of the pre-crushed limestone to 90% passing 325 mesh. The limestone slurry from the VTMs will be discharged to the existing lime slurry storage tank. The lime slurry storage tank will be outfitted with a new agitator to keep the limestone slurry in suspension while stored in the tank. The remainder of the reagent storage and delivery system will be reused as is.

## 4.3 Chemical Additive and Storage

An FGD buffer additive will be required to meet the desired SO<sub>2</sub> removal efficiency upon converting to use of limestone reagent. For LSIO operation, sodium formate is the most cost-effective performance additive. Approximately 1,000 ppm of sodium formate will be required at design fuel conditions when targeting 98% SO<sub>2</sub> removal with three absorber towers in service.

Addition of sodium formate will require the addition of one new sodium formate tank and two additive feed pumps. The storage tank will be installed outdoors adjacent to the existing slaker building while the feed pumps will be installed within the existing slaker building. The tank is sized with a nominal capacity of 29,000 gallons equivalent to 14 days of use at full load operation. An alternative location for the storage tank inside the existing slaker building is under evaluation by Duke Energy and AECOM. The existing emulsified sulfur storage and delivery system will be replaced as it has reached end of service.

## 4.4 Mist Eliminator Wash System

The ME wash system will be upgraded to improve the quality of the wash with respect to wash intensity, wash pressure and wash duration. The existing ME wash headers will be reused as is. The design of the headers provides greater than 150% wash coverage across the ME surfaces, which is adequate for LSIO operation. However, the existing service water pump can only provide about 20-30 psig of wash pressure at the mist eliminator elevation. Typically, ME wash is delivered at 40-50 psig to ensure adequate force is applied with the wash water to dislodge solids that accumulate. Operation of the existing East Bend ME wash headers at around 50 psig will provide approximately 1,000 gpm of flow per header and increase wash intensity (gpm/ft<sup>2</sup>) to nearly 1.5 gpm/ft<sup>2</sup> which is consistent the Electric Power Research Institute (EPRI) recommendations.

A new service water pump will be provided to generate at least 40-50 psig and approximately 1,000 gpm at the ME elevation for improved wash pressure and intensity. Piping of larger diameter will be retrofit to the ME wash supply to minimize friction losses with the increased flow. The ME wash sequence will also be modified to achieve a 60 second wash for each ME zone once per hour at full load conditions. These control system modifications are necessary to maintain the FGD system water balance. ME wash system reliability will also be improved with the addition of two new Lakos filters installed in parallel with the existing Lakos filters to create a 3+1 arrangement (4 x 33% capacity) filtration system.



## 5. Contract and Procurement Execution Approach

The project contracting and procurement execution approach assumes one entity providing execution of the scope of work under and EPC contract. The procurement and subcontracting WBS is provided in Table 5-1.

**Table 5-1: Procurement and Subcontracting WBS**

WBS Area	Package Number	Description
Common	81.112	Site Laser Scan
Common	81.110	Site Survey
Common	81.115	Geotechnical Investigation
Common	81.010	General Construction
Material Handling	63.000	Flowability Study
Material Handling	72.252	Conveyor System
Limestone Prep	71.114	Cranes and Hoists
Limestone Prep	72.250.1	Vertimill
Limestone Prep	72.250.2	Pre-Crusher
Limestone Prep	72.272	Dust Collector
Limestone Prep	73.300	Power Distribution Center (PDC)
FGD	81.008	Absorber Recycle Pump Refurbishment
FGD	72.229	Mist Eliminator Wash Filters (Lakos and Pods)
FGD	72.214	Recycle Piping, FRP (External)
FGD	72.200	Mist Eliminator Wash Nozzles
FGD	72.202	Recycle Spray Nozzles
FGD	72.212	Alloy Material, Recycle Spray Headers (Internal)
FGD	72.216	Recycle Pipe Supports (External)
Dewatering	72.246	Agitators

The division of responsibilities for the EPC works is outlined in Table 5-2 to establish various stakeholders' roles and responsibilities throughout the project.

**Table 5-2: LSIO Conversion Project Division of Responsibility**

Item	Description	Engineering and Design Services	Equipment and Material Supply	Installation and Erection
1	Site Laser Scan	SUB	N/A	N/A
2	Site Survey	SUB	N/A	N/A
3	Geotechnical Investigation	SUB	N/A	N/A
4	General Construction (GC)	AECOM	AECOM	AECOM
5	Flowability Study	SUB	N/A	N/A
6	Conveyor System	CS	AECOM	GC
7	Vertimill	VTM	AECOM	GC
8	Pre-Crusher	PC	AECOM	GC
9	Power Distribution Center	PDC	AECOM	GC
10	Recycle Piping	AECOM / PIPE	AECOM	GC

Item	Description	Engineering and Design Services	Equipment and Material Supply	Installation and Erection
11	Recycle Pumps (Refurbishment)	PUMP	PUMP	Duke
12	Recycle Pumps (New Sheaves)	AECOM	GC	GC
13	Recycle Spray Nozzles	NZL	AECOM	GC
14	Recycle Pipe Supports	PIPE	AECOM	GC
15	Agitators	AGIT	AECOM	GC
17	Balance of Plant	AECOM	GC	GC
18	Site Road Improvements	DUKE	DUKE	DUKE
19	Demolition	AECOM	GC	GC
20	Commissioning	AECOM	N/A	N/A
21	Startup	AECOM	N/A	N/A
22	Performance Testing	AECOM	N/A	N/A



## Appendix A - General Arrangement Drawings



PROJECT  
East Bend WFGD  
Limestone Conversion  
Phase 1 Engineering Study

EAST BEND STATION  
RT 338, 6293 Beaver Rd  
Union, KY 41091-0142

CLIENT  
Duke Energy  
525 South Tryon  
Charlotte, NC 28202  
http://www.duke-energy.com

CONSULTANT  
AECOM Process Technologies  
13640 Briarwick Drive, Suite 200  
Austin, Tx 78729  
512-454-4797 tel  
www.aecom.com

PRELIMINARY

FOR PERMITTING  
PURPOSES ONLY

REGISTRATION



*Anthony Pruske*  
4/27/24

ISSUE/REVISION

IR	DATE	DESCRIPTION
A	2024-03-22	Issue for Permit Application

KEY PLAN

PROJECT NUMBER

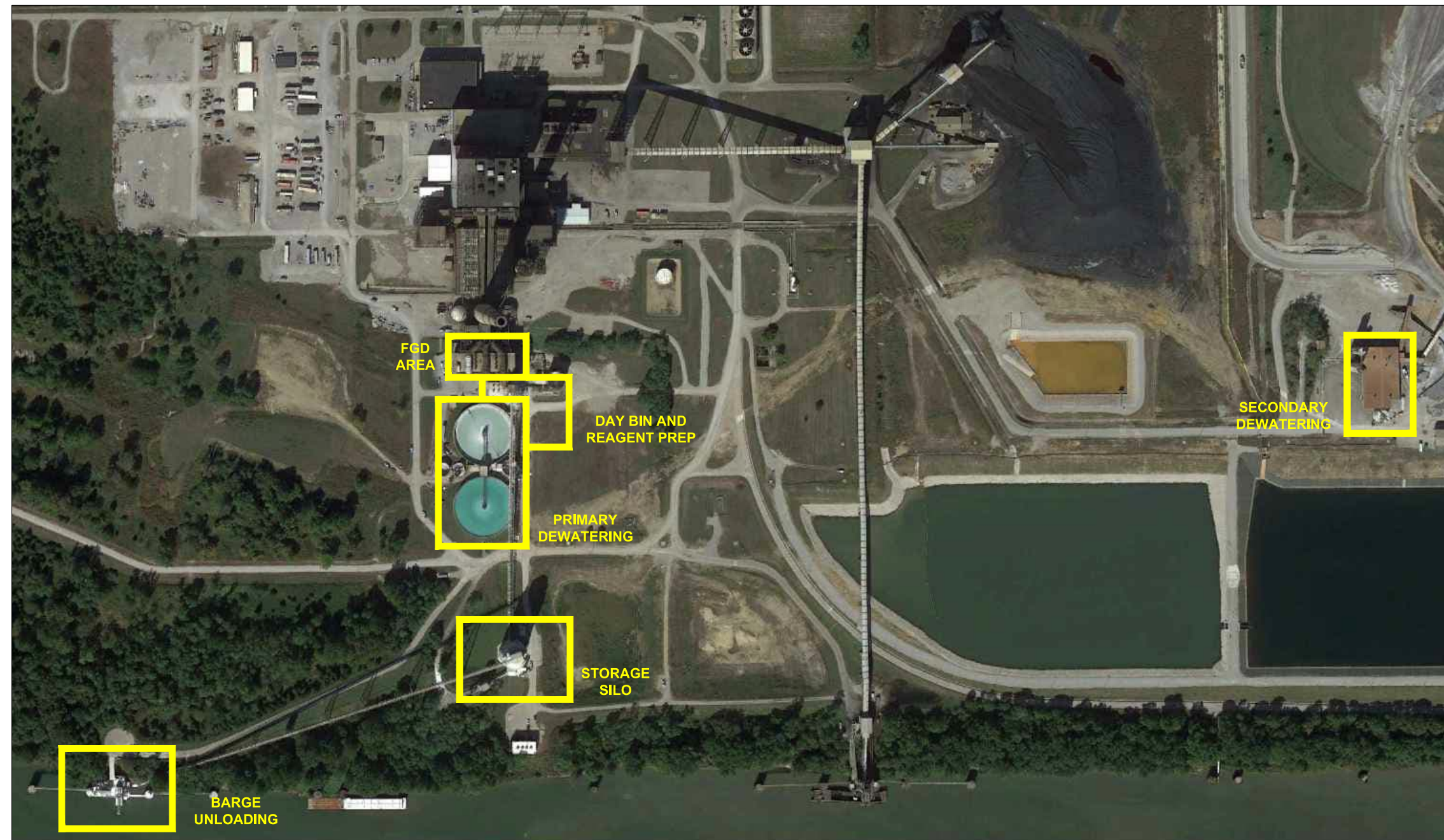
60724995

SHEET TITLE

GENERAL ARRANGEMENT  
SITE PLAN

SHEET NUMBER

60724995-M-SK-200



ARCH D 24" X 36"

Approved: \_\_\_\_\_

Checked: \_\_\_\_\_

Designer: \_\_\_\_\_

Project Management Initials: \_\_\_\_\_

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**PROJECT**  
 East Bend WFGD  
 Limestone Conversion  
 Phase 1 Engineering Study

EAST BEND STATION  
 RT 338, 8293 Beaver Rd  
 Union, KY 41091-0142

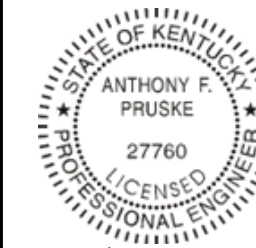
**CLIENT**  
 Duke Energy  
 525 South Tryon  
 Charlotte, NC 28202  
 http://www.duke-energy.com

**CONSULTANT**  
 AECOM Process Technologies  
 13640 Briarwick Drive, Suite 200  
 Austin, Tx 78729  
 512-454-4797 tel  
 www.aecom.com

**PRELIMINARY**

**FOR PERMITTING PURPOSES ONLY**

**REGISTRATION**



*Anthony Pruske*  
 4/27/24

**ISSUE/REVISION**

IR	DATE	DESCRIPTION
B	2024-04-12	Issue for Permit Application
A	2024-03-22	Issue for Permit Application

**KEY PLAN**

**PROJECT NUMBER**  
 60724995

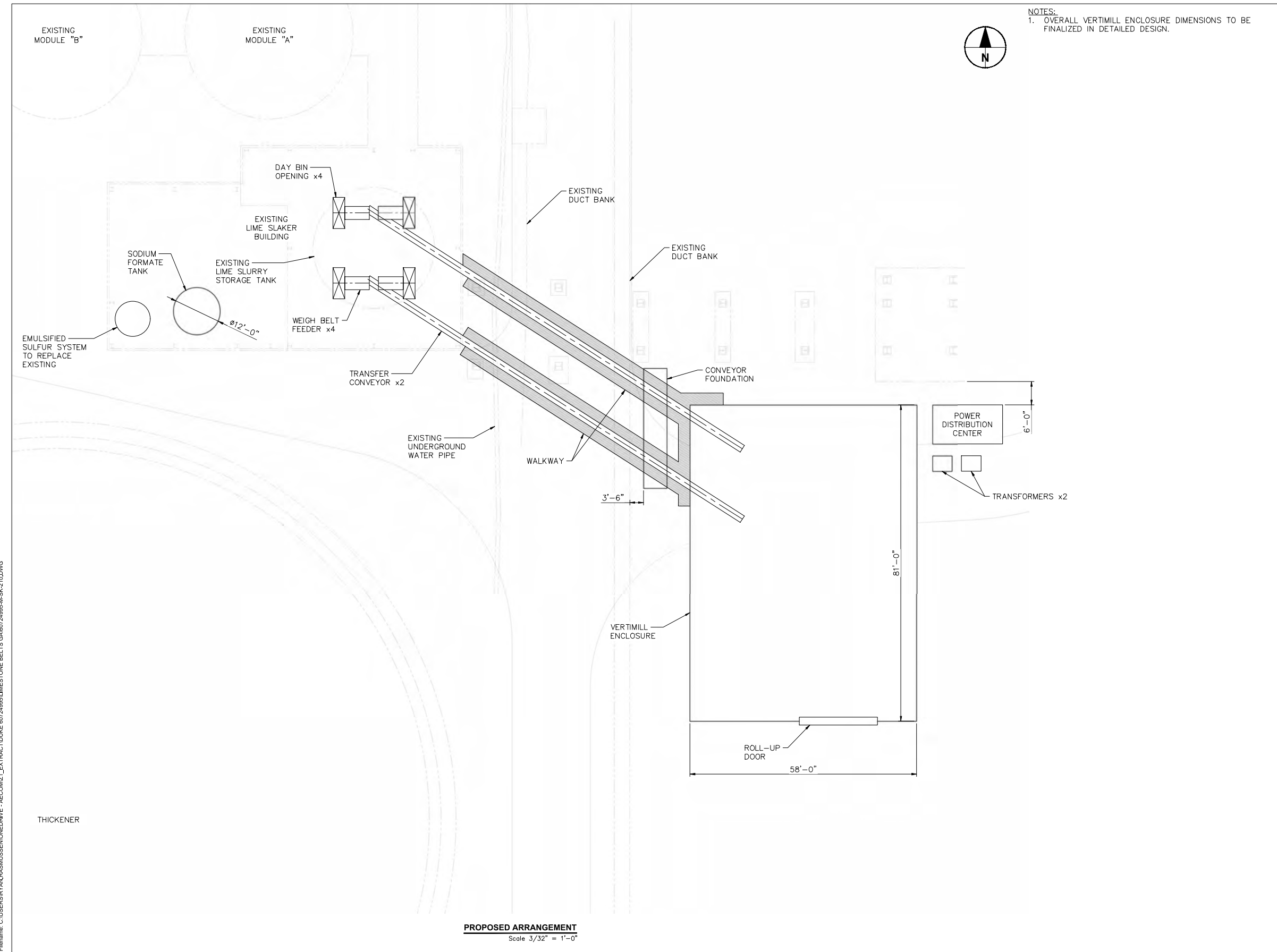
**SHEET TITLE**  
 General Arrangement  
 Limestone Preparation

**SHEET NUMBER**  
 60724995-M-SK-210

**NOTES:**  
 1. OVERALL VERTIMILL ENCLOSURE DIMENSIONS TO BE FINALIZED IN DETAILED DESIGN.



ARCH D 24" x 36"  
 Approved: \_\_\_\_\_  
 Checked: \_\_\_\_\_  
 Designer: \_\_\_\_\_  
 Project Management Initials: \_\_\_\_\_



**PROPOSED ARRANGEMENT**  
 Scale 3/32" = 1'-0"

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**PROJECT**  
 East Bend WFGD  
 Limestone Conversion  
 Phase 1 Engineering Study

EAST BEND STATION  
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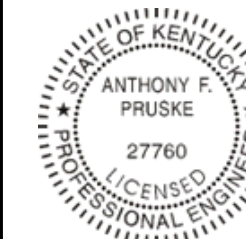
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IR	DATE	DESCRIPTION
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**KEY PLAN**

**PROJECT NUMBER**

60724995

**SHEET TITLE**

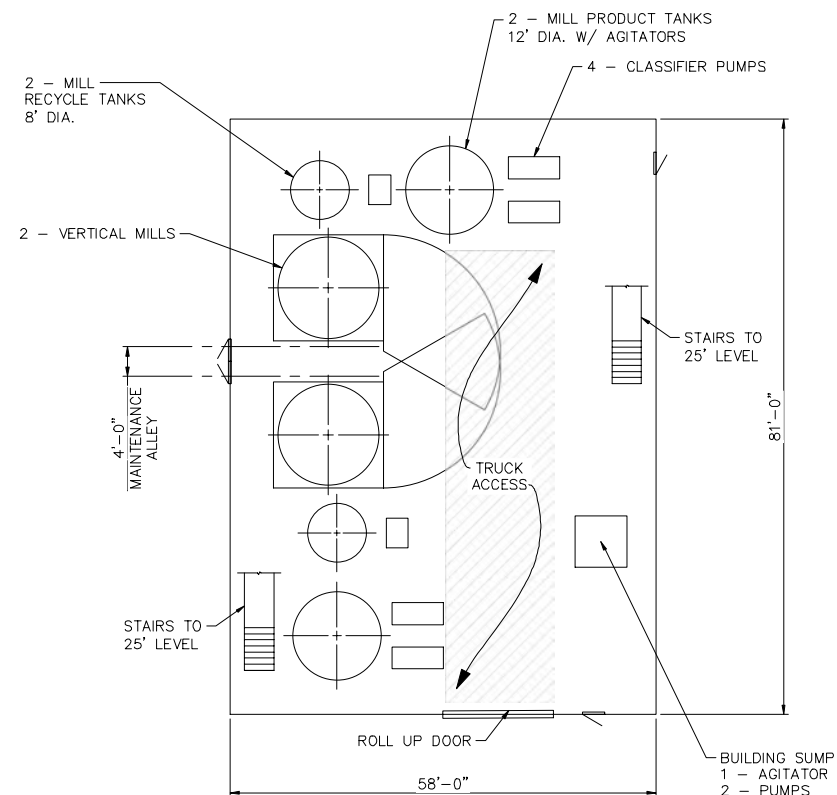
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 VERTIMILL ENCLOSURE

**SHEET NUMBER**

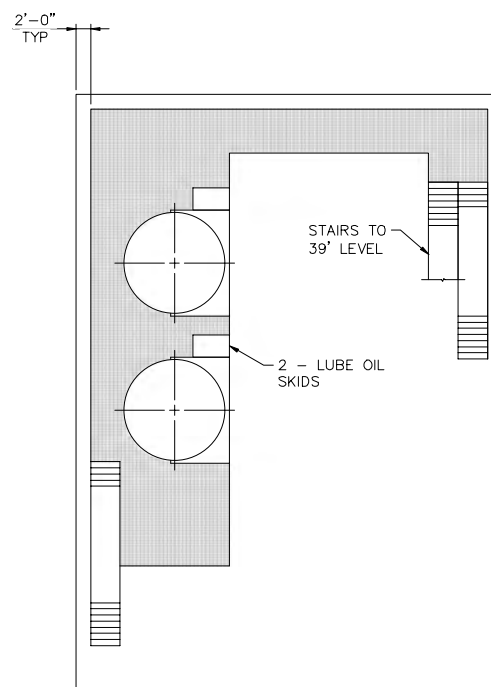
60724995-M-SK-215

**NOTES:**

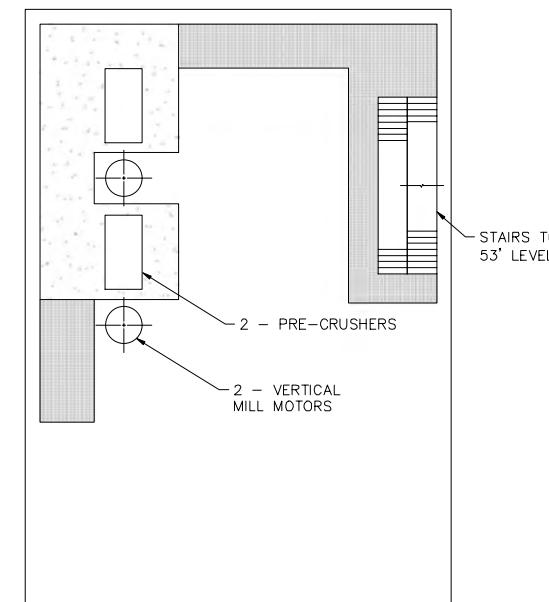
- REQUIRED HOISTING EQUIPMENT:  
 ONE 35 TON BRIDGE CRANE  
 2 TON MONORAILS AS REQUIRED
- PLATFORMING SHOWN FOR INFORMATION ONLY.  
 FINAL PLATFORMING AND COLUMN LAYOUT TO BE  
 FINALIZED IN DETAILED DESIGN.
- OVERALL ENCLOSURE DIMENSIONS TO BE FINALIZED IN  
 DETAILED DESIGN.



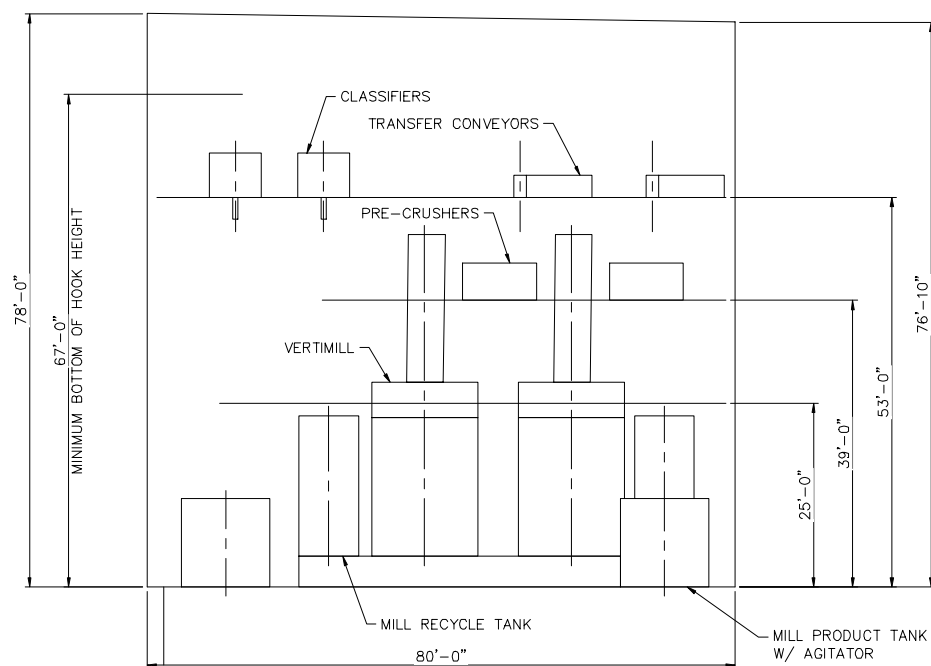
**PLAN VIEW AT EL 0'-0"**  
 Scale: 3/32" = 1'-0"



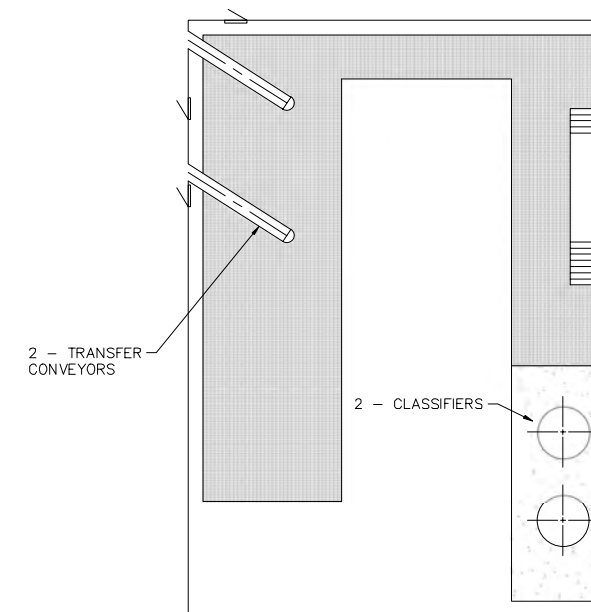
**PLATFORM PLAN AT EL 25'-0"**  
 Scale: 3/32" = 1'-0"



**PLATFORM PLAN AT EL 39'-0"**  
 Scale: 3/32" = 1'-0"



**SECTION LOOKING WEST**  
 Scale: 3/32" = 1'-0"



**PLATFORM PLAN AT EL 53'-0"**  
 Scale: 3/32" = 1'-0"

ARCH D 24' x 36'

Approved: \_\_\_\_\_

Checked: \_\_\_\_\_

Designer: \_\_\_\_\_

Project Management Initials: \_\_\_\_\_

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PROJECT  
East Bend WFGD  
Limestone Conversion  
Phase 1 Engineering Study

EAST BEND STATION  
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Union, KY 41091-0142

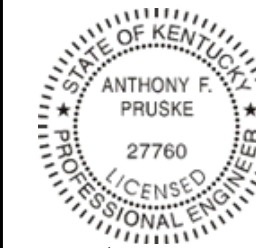
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4/27/24

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KEY PLAN

PROJECT NUMBER

60724995

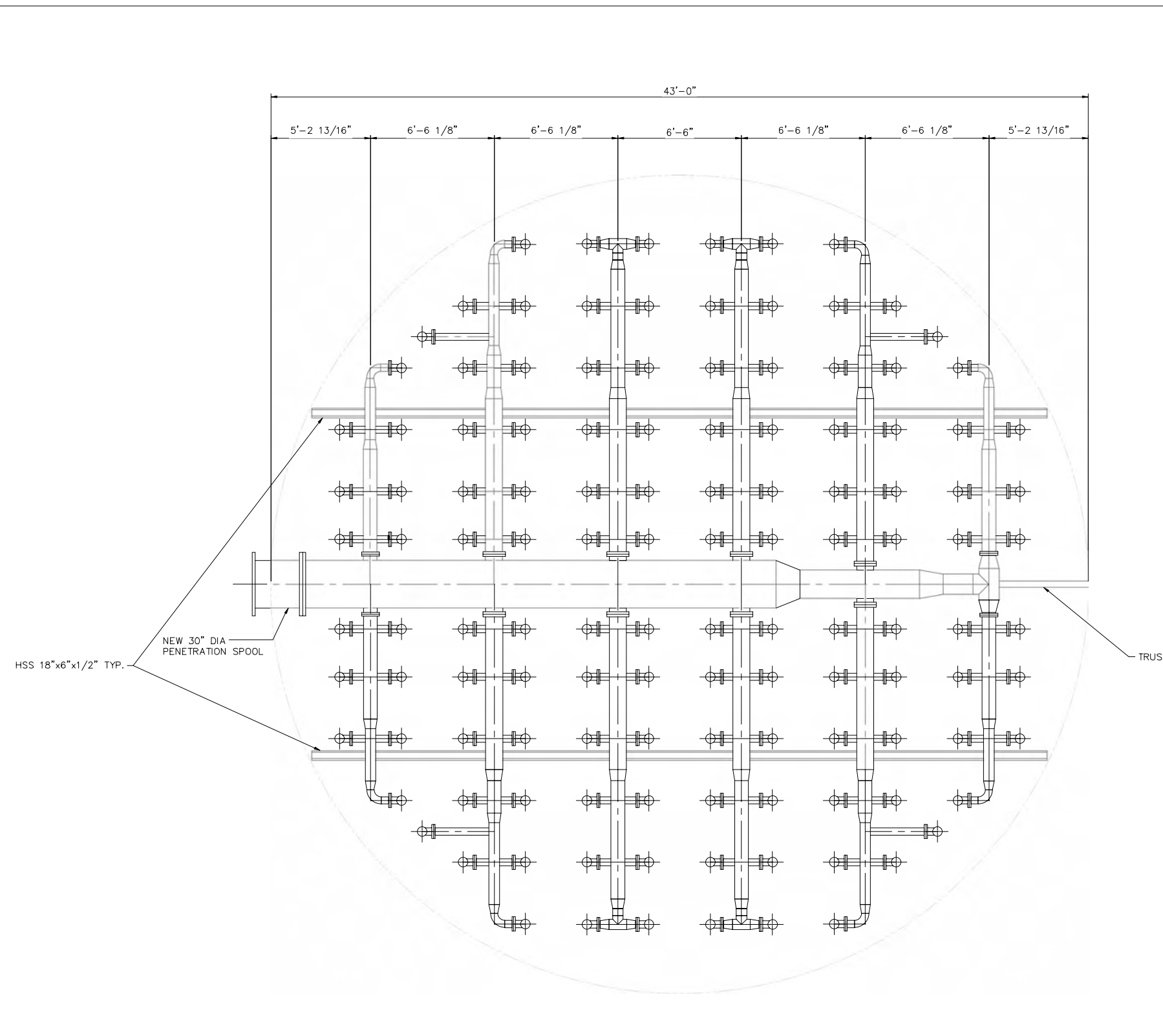
SHEET TITLE

Spray Header Piping Arrangement

SHEET NUMBER

60724995-M-SK-225

- NOTES:
1. PIPING MATERIAL SPECIFICATION PN01SD1B02
  2. QTY 1 SHOWN; 6 REQUIRED



ABSORBER INTERNAL SPRAY HEADER PLAN VIEW  
Scale 3/8"=1'-0"

ARCH D 24" x 36"

Approved: \_\_\_\_\_

Checked: \_\_\_\_\_

Designer: \_\_\_\_\_

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**PROJECT**  
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4/27/24

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B	2024-04-09	Issue for Permit Application
A	2024-03-22	Issue for Permit Application

**KEY PLAN**

**PROJECT NUMBER**  
60724995

**SHEET TITLE**  
GENERAL ARRANGEMENT  
SECONDARY DEWATERING

**SHEET NUMBER**  
60724995-M-SK-230

- NOTES:**
1. NEW PIPING SHOWN IN RED.
  2. EXISTING PUG MILL 2-1 WILL BE REPLACED IN-KIND.



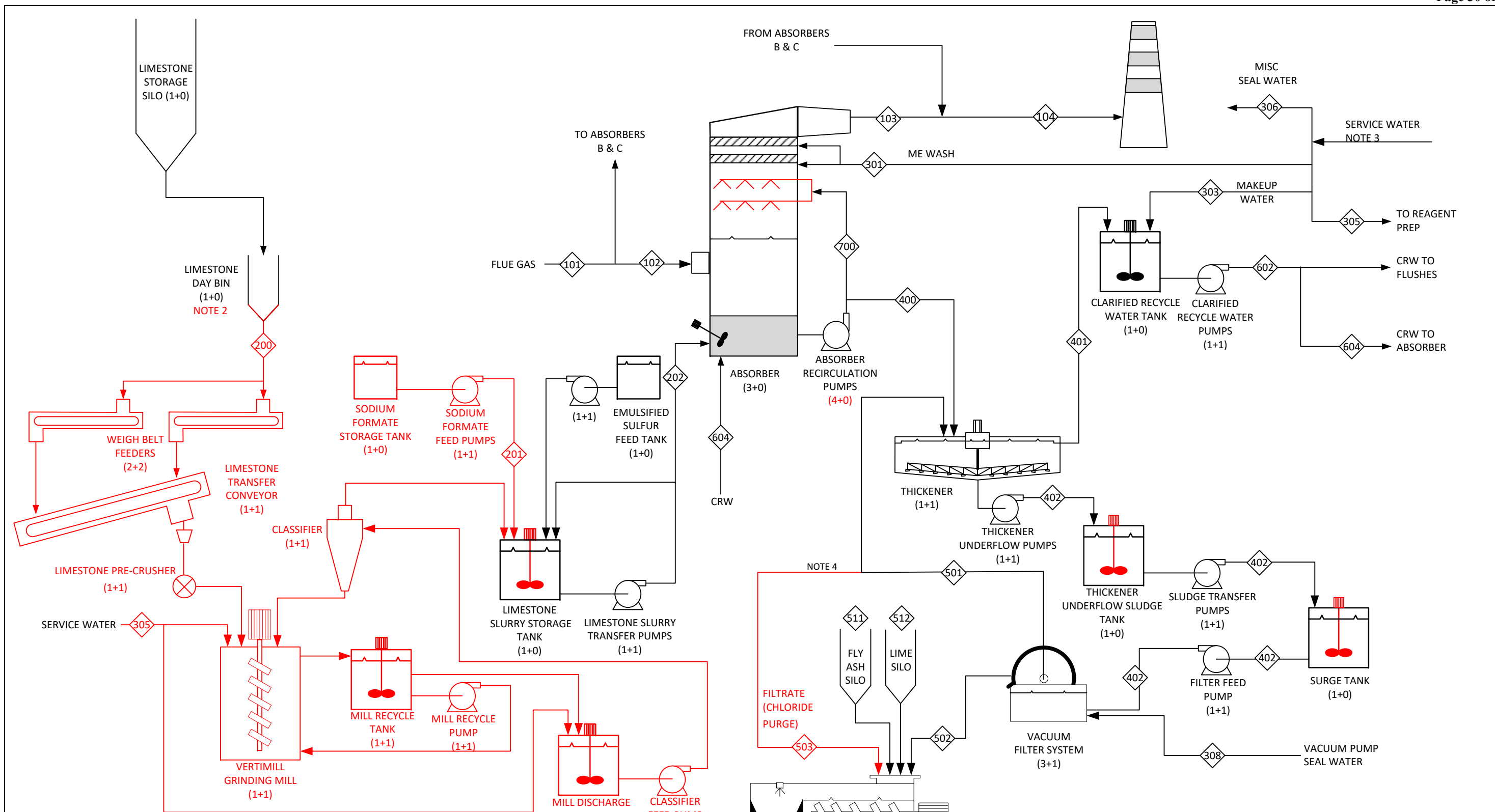
ARCH D 24" x 36"  
 Approved: \_\_\_\_\_  
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 Project Management Initials: \_\_\_\_\_

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## Appendix B - PFD and Material Balance





- NOTES:
1. RED DENOTES NEW EQUIPMENT REQUIRED FOR LIMESTONE CONVERSION.
  2. THE EXISTING DAY BIN WILL BE MODIFIED WITH FOUR OUTLETS FROM CURRENT EIGHT OUTLET CONFIGURATION. EACH OUTLET WILL FEED A NEW WEIGH BELT FEEDER SIZED FOR 50% CAPACITY OF THE SYSTEM. TWO WEIGH BELTS WILL FEED ONE TRANSFER CONVEYOR (1+1).
  3. NEW SERVICE WATER PUMP (1+1) WILL BE PROVIDED AS PART OF THE CONVERSION PROJECT.
  4. CHLORIDE PURGE WILL BE DRAWN FROM DISCHARGE PIPING OF FILTRATE PUMP UPSTREAM OF FILTRATE STORAGE TANK. FILTRATE TANKS AND PUMPS NOT SHOWN FOR CLARITY.

Proprietary Information – Subject to Duke Energy/AECOM Confidentiality Agreement

<b>AECOM</b>	
CLIENT / PROJECT NAME Duke Energy - East Bend Station WFGD Limestone Conversion Process Flow Diagram	PROJECT NO. 60680586
DRAWING NUMBER PFD - 101	DRAWING REVISION 0
	DATE June 08, 2022



**Duke East Bend Unit 2**

**Mass Balance - Limestone, Full Load, 600MW**

5.67 lb SO2/MMBtu Inlet, 0.113 lb SO2/MMBtu Stack Outlet

Refer to PFD drawing #101

Stream No.	101				102				103				104			
	Description	Booster Fan Outlet	Inlet Flue Gas per Abs.	Outlet Flue Gas per Abs.	Total Gas Out											
Flow, acfm		2,749,086	916,362	745,253	2,244,767											
Flow, lb/hr		8,327,832	2,775,944	2,915,141	8,745,424											
H2O, lb/hr		372,535	124,178	275,896	827,689											
SO2, lb/hr		36,579	12,193	244	732											
SO2, ppmd		2,179	2,179	44	44											
HCl, lb/hr		506	169	0	0											
HCl, ppmd		53	53	0	0											
Ash, lb/hr		394	131	26	79											
O2, lb/hr		685,120	228,373	228,075	684,225											
O2, % dry		8.2	8.2	8.2	8.2											
Temperature, F		330	330	126	126											
Pressure, IWCG (psig)		8	8	5	3											

Stream No.	Description	200		201		202		301		303		305		306		308		400		401		402	
		Dry Reagent	Concentrated Additive	Reagent Feed	ME Wash	FGD Makeup Water	Make-up Water To Reagent Prep	Misc Seal Water	Vacuum Pump Seal Water	Absorber Bleed Stream	Primary OF to CRW Tank	Primary Dewatering UF											
Flow, gpm		--	1.1	356	214	493	301	20	50	1,024	829	452											
Flow, lb/hr		69,396	719	218,552	107,190	246,661	150,678	10,006	25,014	552,566	414,562	271,600											
Total SS, lb/hr		67,384	0	65,436	5	25	6	0	1	82,885	1,538	81,480											
Total SS, %		97.10%	0.00%	29.94%	0.00%	0.01%	0.00%	0.00%	0.00%	15.00%	0.37%	30.00%											
pH		--	0.00	7.48	8.10	7.80	8.10	8.10	8.10	5.80	5.80	5.80											
Specific gravity		--	1.26	1.23	1.00	1.00	1.00	1.00	1.00	1.09	1.01	1.22											
H2O, lb/hr		2,012	431	153,116	107,185	246,636	150,672	10,005	25,013	469,681	413,023	190,120											
CaCO3, lb/hr		59,031	0	59,037	5	0	6	0	1	2,383	44	2,342											
CaSO4-2H2O, lb/hr		0	0	0	0	0	0	0	0	0	0	0											
CaSO3-1/2H2O, lb/hr		0	0	0	0	0	0	0	0	73,636	1,367	72,388											
Fly Ash, lb/hr		0	0	0	0	0	0	0	0	321	6	316											
Inerts, lb/hr		6,399	0	6,399	0	25	0	0	0	6,545	121	6,434											
Cl, lb/hr		0	0	4	3	3	4	0	1	3,273	2,770	1,325											
Cl, mg/L		0 ppm	0	27	27	14	27	27	12	6,938	6,728	6,938											
Mg, lb/hr		291	0	293	1	22	2	0	0	2,063	1,746	835											
Mg, mg/L		4325 ppm	0	1,921	12	90	12	12	12	4,373	4,241	4,373											
Sodium Formate, lb/hr		0	288	288	0	0	0	0	0	472	399	191											
Sodium Formate, mg/L		0 ppm	500,530	1,884	0	0	0	0	0	1,000	970	1,000											

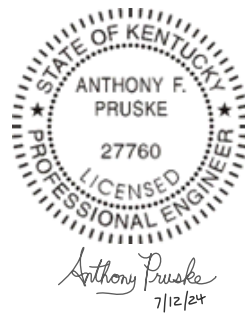
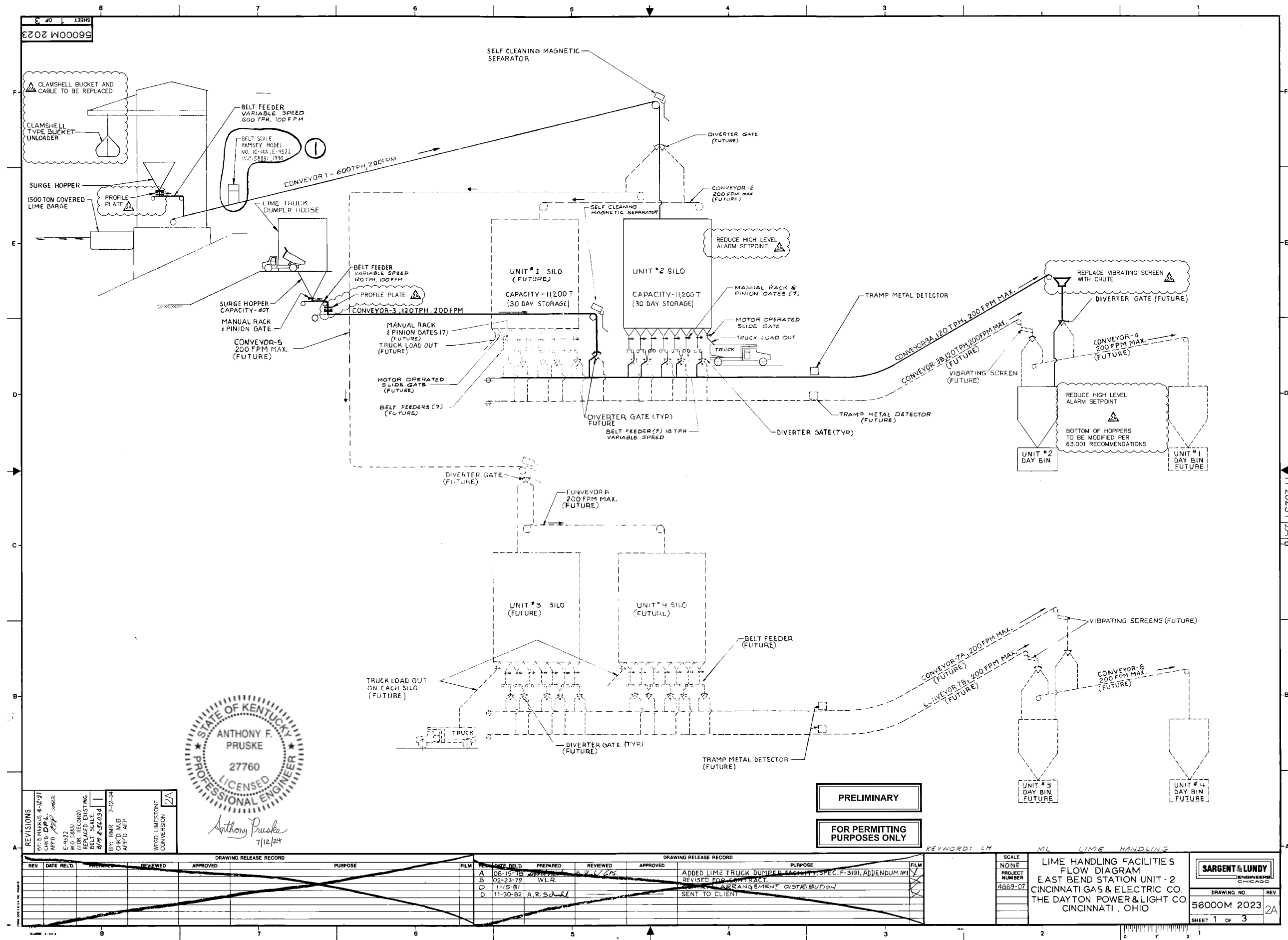
Stream No.	Description	501		502		503		511		512		520		602		604		700	
		Total Filtrate Water	Secondary Dewatering Product	Filtrate Purge	Fly Ash to Blending	Lime to Blending	Blended Product	CRW Pump Discharge	CRW to Absorber	Recycle Slurry Flow									
Flow, gpm		341	--	75	--	--	--	--	1,325	1,325	46,000								
Flow, lb/hr		171,523	125,092	37,927	39,039	4,372	206,430	661,223	661,223	24,825,225									
Total SS, lb/hr		172	81,310	38	39,039	4,372	124,759	1,563	1,563	3,723,784									
Total SS, %		0.10%	65.00%	0.10%	100.00%	100.00%	60.44%	0.24%	0.24%	15.00%									
pH		6.07	--	6.07	--	--	--	6.55	6.55	5.80									
Specific gravity		1	--	1.01	--	--	--	1.01	1.01	1.09									
H2O, lb/hr		171,351	43,782	37,889	0	0	81,671	659,660	659,660	21,101,441									
CaCO3, lb/hr		5	2,338	1	0	4,372	6,712	44	44	107,042									
CaSO4-2H2O, lb/hr		0	0	0	0	0	0	0	0	0									
CaSO3-1/2H2O, lb/hr		152	72,236	34	0	0	72,269	1,367	1,367	3,308,259									
Fly Ash, lb/hr		1	315	0	39,039	0	39,354	6	6	14,441									
Inerts, lb/hr		14	6,420	3	0	0	6,423	146	146	294,042									
Cl, lb/hr		1,056	270	233	--	--	503	2,774	2,774	145,959									
Cl, mg/L		6,180	2156 (ppm)	6,180	--	--	2438 (ppm)	4,218	4,218	6,938									
Mg, lb/hr		665	170	147	--	--	317	1,768	1,768	92,005									
Mg, mg/L		3,895	3,895	3,895	--	--	3,895	2,689	2,689	4,373									
Sodium Formate, lb/hr		152	39	34	--	--	72	399	399	21,037									
Sodium Formate, mg/L		890	890	890	--	--	890	607	607	1,000									

Notes:

- 1. Flows in material balance represent average, steady-state flows at noted conditions.

Duke Energy East Bend Station

## Appendix C - P&IDs



**REVISIONS**

NO.	DATE	BY	DESCRIPTION
1	06-15-18	WLR	ADDED LIME TRUCK DUMPER FACILITY, SPEC. F-3191, ADDENDUM NO. 1
2	02-23-79	WLR	REVISED FOR CONTRACT
3	1-15-81	A.R.S.	GENERAL ARRANGEMENT DISTRIBUTION
4	11-30-82	A.R.S.	SENT TO CLIENT

**DRAWING RELEASE RECORD**

REV.	DATE	FIELD	PREPARED	REVIEWED	APPROVED	PURPOSE
A	06-15-18		WLR	WLR	WLR	ADDED LIME TRUCK DUMPER FACILITY, SPEC. F-3191, ADDENDUM NO. 1
B	02-23-79		WLR	WLR	WLR	REVISED FOR CONTRACT
C	1-15-81		A.R.S.	A.R.S.	A.R.S.	GENERAL ARRANGEMENT DISTRIBUTION
D	11-30-82		A.R.S.	A.R.S.	A.R.S.	SENT TO CLIENT

**PRELIMINARY**  
**FOR PERMITTING PURPOSES ONLY**

KEYWORD: LH ML LIME HANDLING

LIME HANDLING FACILITIES  
 FLOW DIAGRAM  
 EAST BEND STATION UNIT - 2  
 CINCINNATI GAS & ELECTRIC CO.  
 THE DAYTON POWER & LIGHT CO  
 CINCINNATI, OHIO

**SARGENT & LUNDY**  
 ENGINEERS  
 CHICAGO

DRAWING NO. 56000M 2023  
 SHEET 1 OF 3  
 REV. 2A



PROJECT  
East Bend WFGD  
Limestone Conversion  
Phase 1 Engineering Study

EAST BEND STATION  
RT 338, 6293 Beaver Rd  
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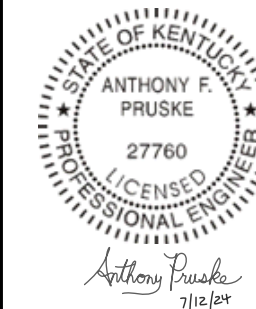
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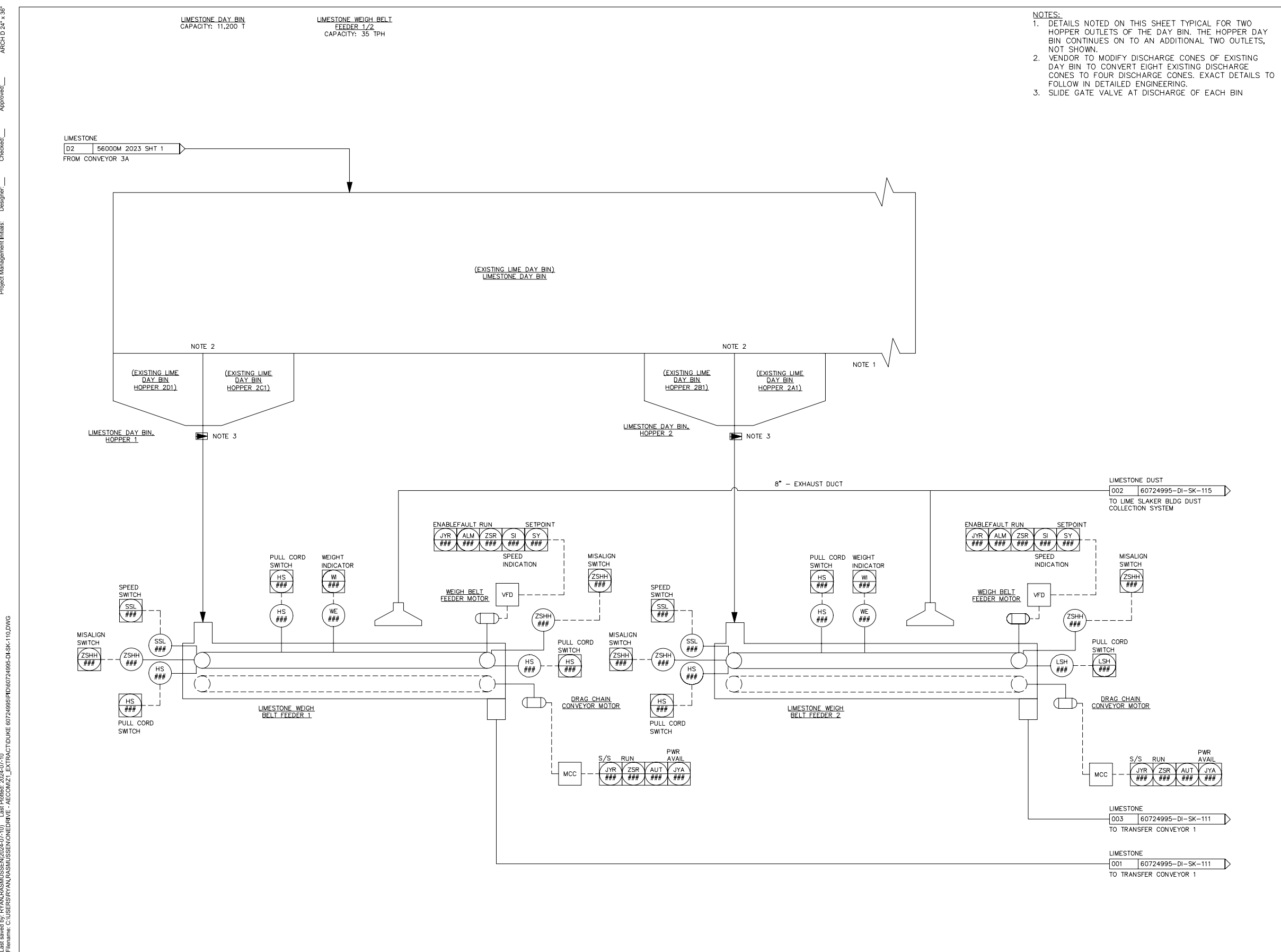
WFGD LIMESTONE CONVERSION  
P&ID  
MATERIAL HANDLING

SHEET NUMBER

60724995-DI-SK-110

NOTES:

1. DETAILS NOTED ON THIS SHEET TYPICAL FOR TWO HOPPER OUTLETS OF THE DAY BIN. THE HOPPER DAY BIN CONTINUES ON TO AN ADDITIONAL TWO OUTLETS, NOT SHOWN.
2. VENDOR TO MODIFY DISCHARGE CONES OF EXISTING DAY BIN TO CONVERT EIGHT EXISTING DISCHARGE CONES TO FOUR DISCHARGE CONES. EXACT DETAILS TO FOLLOW IN DETAILED ENGINEERING.
3. SLIDE GATE VALVE AT DISCHARGE OF EACH BIN



ARCH D 24" x 36"  
Approved: \_\_\_\_\_  
Checked: \_\_\_\_\_  
Designer: \_\_\_\_\_  
Project Management Initials: \_\_\_\_\_

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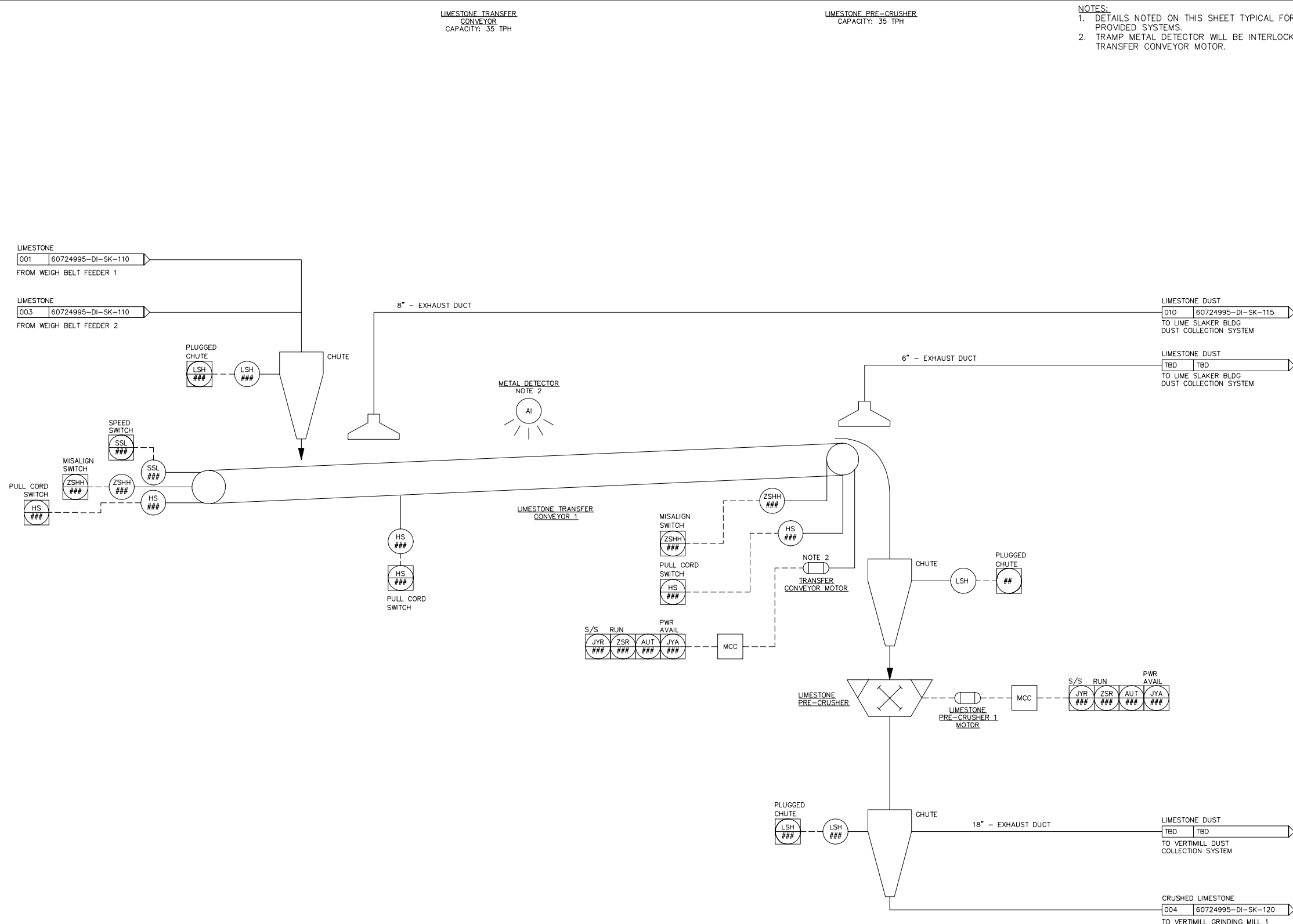
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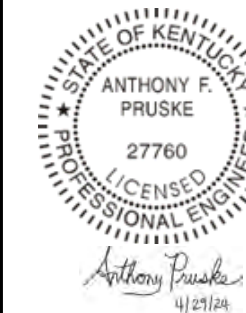
- NOTES:**
1. DETAILS NOTED ON THIS SHEET TYPICAL FOR TWO PROVIDED SYSTEMS.
  2. TRAMP METAL DETECTOR WILL BE INTERLOCKED WITH TRANSFER CONVEYOR MOTOR.



**PRELIMINARY**

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**REGISTRATION**



**ISSUE/REVISION**

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WFGD LIMESTONE CONVERSION  
 P&ID  
 MATERIAL HANDLING

**SHEET NUMBER**

60724995-DI-SK-111

ARCH D 24" x 36"

Approved: \_\_\_\_\_

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Project Management Initials: \_\_\_\_\_

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**PROJECT**  
 East Bend WFGD  
 Limestone Conversion  
 Phase 1 Engineering Study

EAST BEND STATION  
 RT 338, 8293 Beaver Rd  
 Union, KY 41091-0142

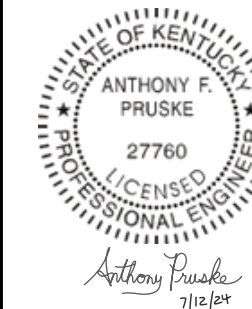
**CLIENT**  
 Duke Energy  
 525 South Tryon  
 Charlotte, NC 28202  
 http://www.duke-energy.com

**CONSULTANT**  
 AECOM Process Technologies  
 13640 Briarwick Drive, Suite 200  
 Austin, TX 78729  
 512-454-4797 tel  
 www.aecom.com

**PRELIMINARY**

**FOR PERMITTING  
 PURPOSES ONLY**

**REGISTRATION**



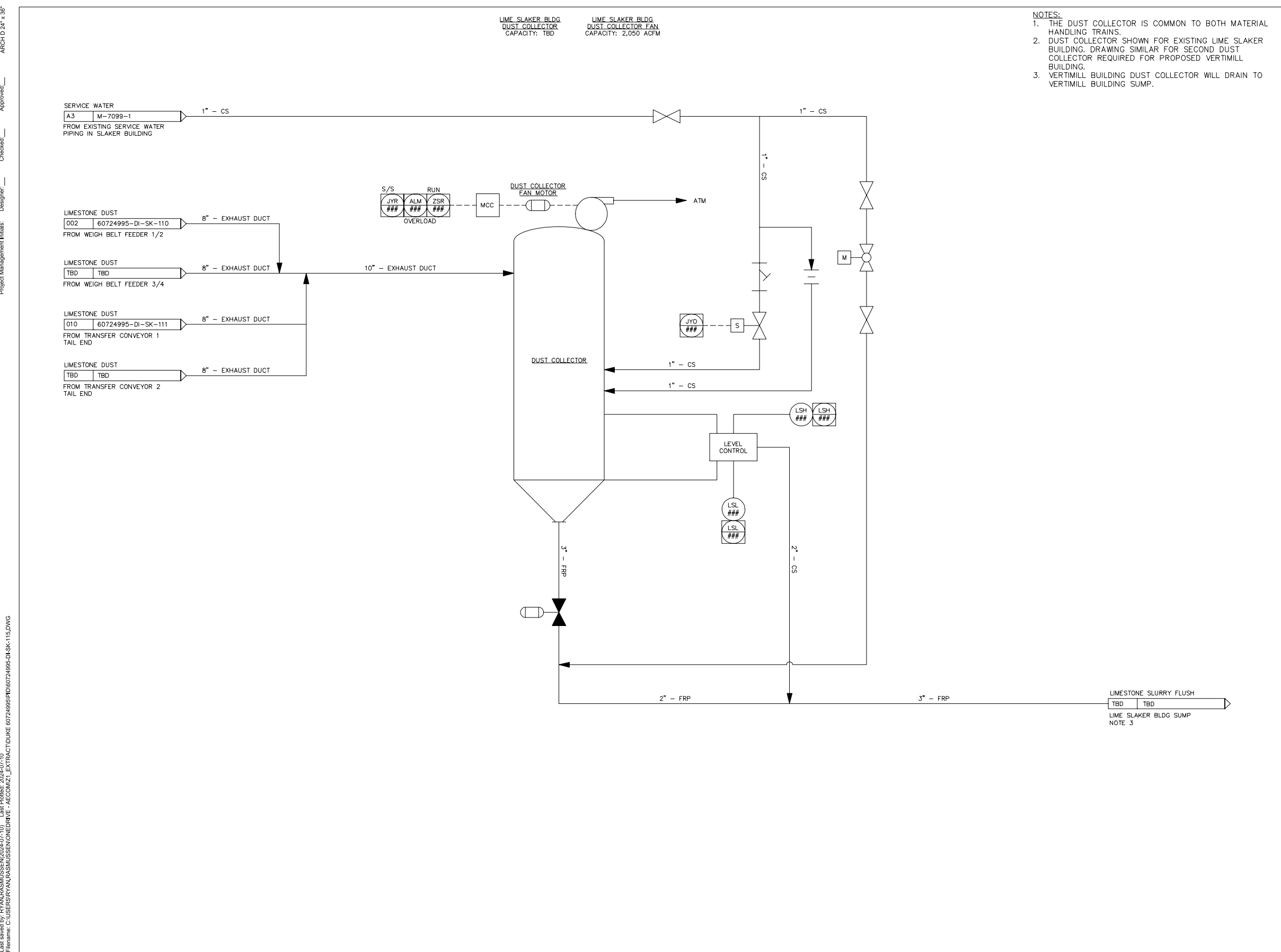
**ISSUE/REVISION**

IR	DATE	DESCRIPTION
0B	2024-07-12	Issue for Permit Application
0A	2024-03-22	Issue for Permit Application

**KEY PLAN**

**PROJECT NUMBER**  
 60724995  
**SHEET TITLE**  
 WFGD LIMESTONE CONVERSION  
 P&ID  
 DUST COLLECTION  
**SHEET NUMBER**  
 60724995-DI-SK-115

- NOTES:**
1. THE DUST COLLECTOR IS COMMON TO BOTH MATERIAL HANDLING TRAINS.
  2. DUST COLLECTOR SHOWN FOR EXISTING LIME SLAKER BUILDING. DRAWING SIMILAR FOR SECOND DUST COLLECTOR REQUIRED FOR PROPOSED VERTIMILL BUILDING.
  3. VERTIMILL BUILDING DUST COLLECTOR WILL DRAIN TO VERTIMILL BUILDING SUMP.



LIME SLAKER BLDG  
 DUST COLLECTOR  
 CAPACITY: TBD

LIME SLAKER BLDG  
 DUST COLLECTOR FAN  
 CAPACITY: 2,050 ACFM

SERVICE WATER  
 A3 M-7099-1  
 FROM EXISTING SERVICE WATER  
 PIPING IN SLAKER BUILDING

LIMESTONE DUST  
 002 60724995-DI-SK-110  
 FROM WEIGH BELT FEEDER 1/2

LIMESTONE DUST  
 TBD TBD  
 FROM WEIGH BELT FEEDER 3/4

LIMESTONE DUST  
 010 60724995-DI-SK-111  
 FROM TRANSFER CONVEYOR 1  
 TAIL END

LIMESTONE DUST  
 TBD TBD  
 FROM TRANSFER CONVEYOR 2  
 TAIL END

LIMESTONE SLURRY FLUSH  
 TBD TBD  
 LIME SLAKER BLDG SUMP  
 NOTE 3

ARCH D 24" x 36"  
 Approved: \_\_\_\_\_  
 Checked: \_\_\_\_\_  
 Designer: \_\_\_\_\_  
 Project Management Initials: \_\_\_\_\_  
 Last saved by: RYAN RASINSKI (2024-07-10) Last Plotted: 2024-07-10  
 Filename: C:\USERS\RYAN.RASINSKI\WORKSPACE\60724995-DI-SK-115.DWG  
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PROJECT  
East Bend WFGD  
Limestone Conversion  
Phase 1 Engineering Study

EAST BEND STATION  
RT 338, 6293 Beaver Rd  
Union, KY 41091-0142

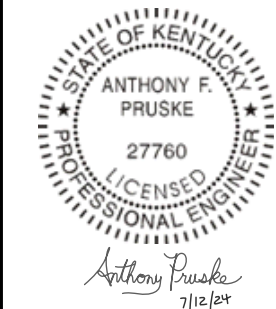
CLIENT  
Duke Energy  
525 South Tryon  
Charlotte, NC 28202  
http://www.duke-energy.com

CONSULTANT  
AECOM Process Technologies  
13640 Briarwick Drive, Suite 200  
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512-454-4797 tel  
www.aecom.com

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ISSUE/REVISION

IR	DATE	DESCRIPTION
0C	2024-07-12	Issue for Permit Application
0B	2024-04-12	Issue for Permit Application
0A	2024-03-22	Issue for Permit Application

KEY PLAN

TO MILL PRODUCT TANK 1

PROJECT NUMBER

60724995

SHEET TITLE

WFGD LIMESTONE CONVERSION  
P&ID  
REAGENT PREP

SHEET NUMBER

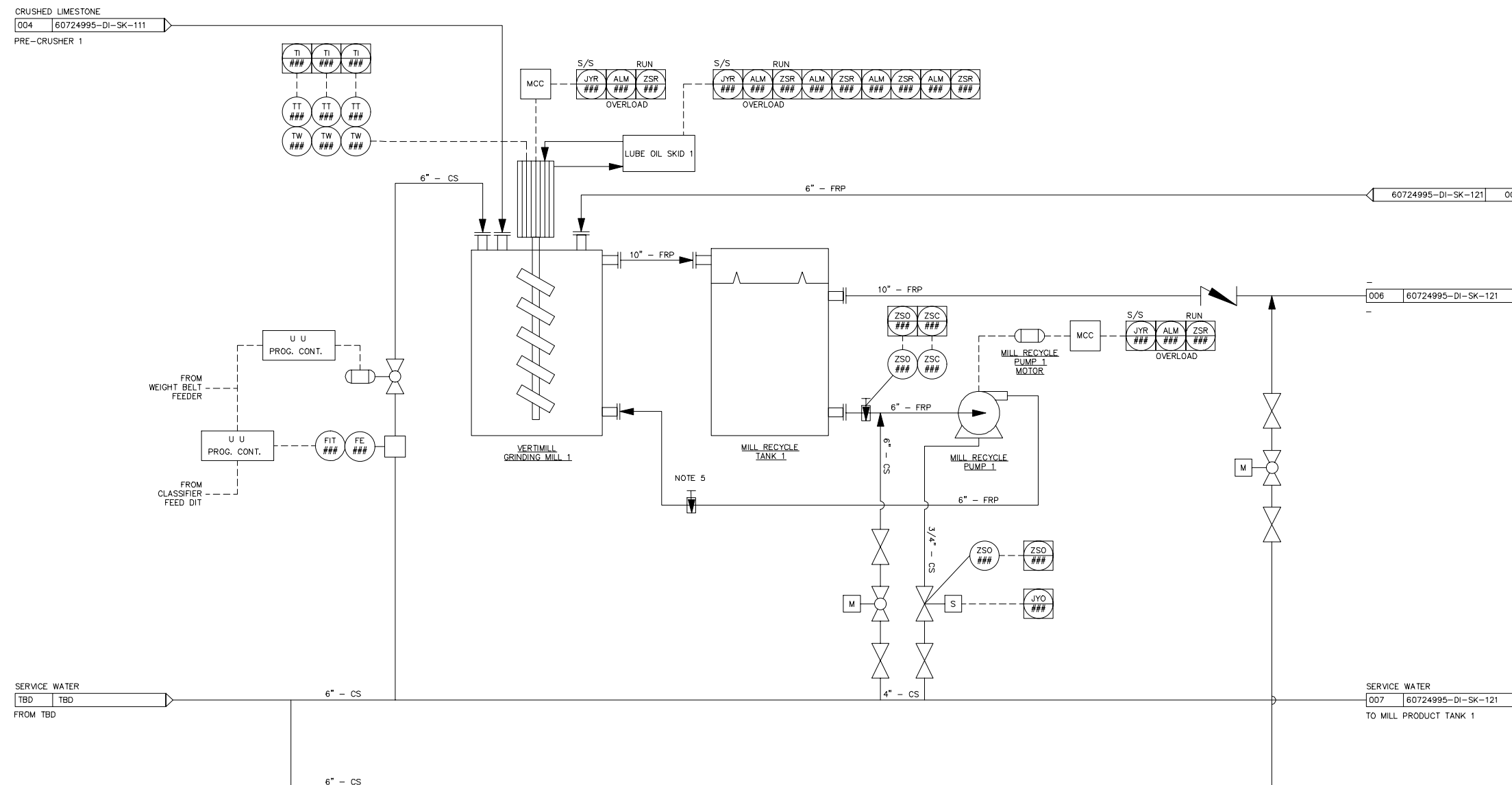
60724995-DI-SK-120

NOTES:  
1. DETAILS NOTED ON THIS SHEET TYPICAL FOR TWO PROVIDED SYSTEMS.

VERTIMILL GRINDING MILL 1  
CAPACITY: 35 TPH

MILL RECYCLE TANK 1  
SIZE: 8.5x19.1(Ø x H)  
CAPACITY: 8,100 GAL TOTAL

MILL RECYCLE PUMP 1  
CAPACITY: 270 GPM @  
TBD TDH



ARCH D 24" x 36"

Approved: \_\_\_\_\_

Checked: \_\_\_\_\_

Designer: \_\_\_\_\_

Project Management Initials: \_\_\_\_\_

Printed on \_\_\_\_\_ Recycled Content Paper  
Last saved by: RYAN RASMUSSEN(2024-07-11) - Last Plotted: 2024-07-11  
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PROJECT  
East Bend WFGD  
Limestone Conversion  
Phase 1 Engineering Study

EAST BEND STATION  
RT 338, 8293 Beaver Rd  
Union, KY 41091-0142

CLIENT  
Duke Energy

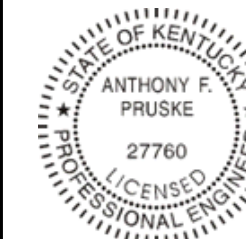
525 South Tryon  
Charlotte, NC 28202  
http://www.duke-energy.com

CONSULTANT  
AECOM Process Technologies  
13640 Briarwick Drive, Suite 200  
Austin, Tx 78729  
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PRELIMINARY

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PURPOSES ONLY

REGISTRATION



Anthony Pruske  
7/12/24

ISSUE/REVISION

IR	DATE	DESCRIPTION
0B	2024-07-12	Issue for Permit Application
0A	2024-03-22	Issue for Permit Application

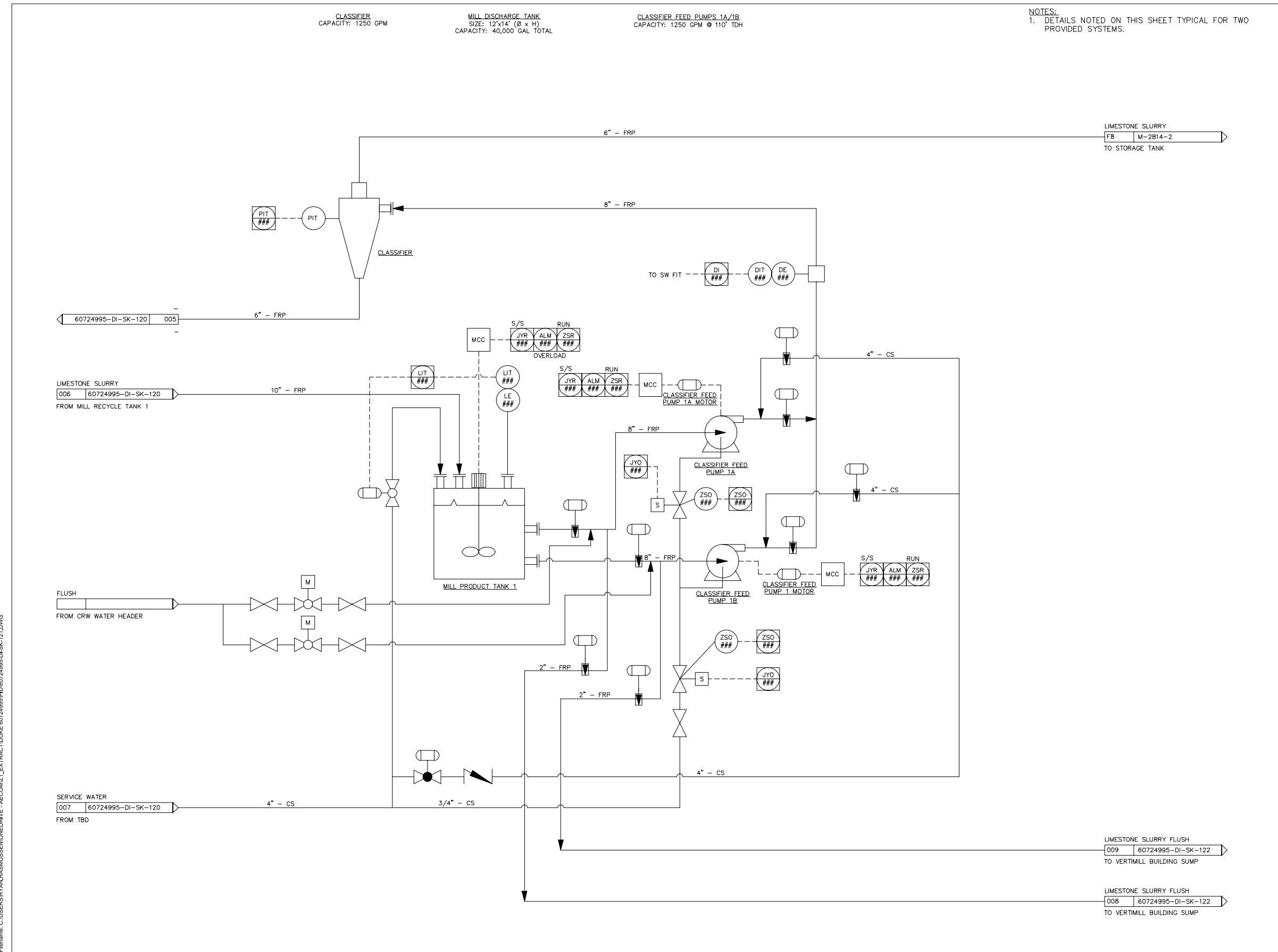
KEY PLAN

PROJECT NUMBER
60724995

SHEET TITLE
WFGD LIMESTONE CONVERSION P&ID REAGENT PREP

SHEET NUMBER
60724995-DI-SK-121

ARCH D 24" x 36"  
Approved: \_\_\_\_\_  
Checked: \_\_\_\_\_  
Designer: \_\_\_\_\_  
Project Management Initials: \_\_\_\_\_



NOTES:  
1. DETAILS NOTED ON THIS SHEET TYPICAL FOR TWO PROVIDED SYSTEMS.

Printed on \_\_\_\_\_  
Recycled Content Paper

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Filename: C:\USERS\RYAN.RASINSKI\WORKSPACE\60724995-DI-SK-121.DWG



**PROJECT**  
 East Bend WFGD  
 Limestone Conversion  
 Phase 1 Engineering Study

EAST BEND STATION  
 RT 338, 6293 Beaver Rd  
 Union, KY 41091-0142

**CLIENT**  
 Duke Energy  
 525 South Tryon  
 Charlotte, NC 28202  
 http://www.duke-energy.com

**CONSULTANT**  
 AECOM Process Technologies  
 13640 Briarwick Drive, Suite 200  
 Austin, Tx 78729  
 512-454-4797 tel  
 www.aecom.com

**PRELIMINARY**

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**REGISTRATION**



*Anthony Pruske*  
 7/12/24

**ISSUE/REVISION**

IR	DATE	DESCRIPTION
0C	2024-07-12	Issue for Permit Application
0B	2024-04-12	Issue for Permit Application
0A	2024-03-22	Issue for Permit Application

**KEY PLAN**

**PROJECT NUMBER**

60724995

**SHEET TITLE**

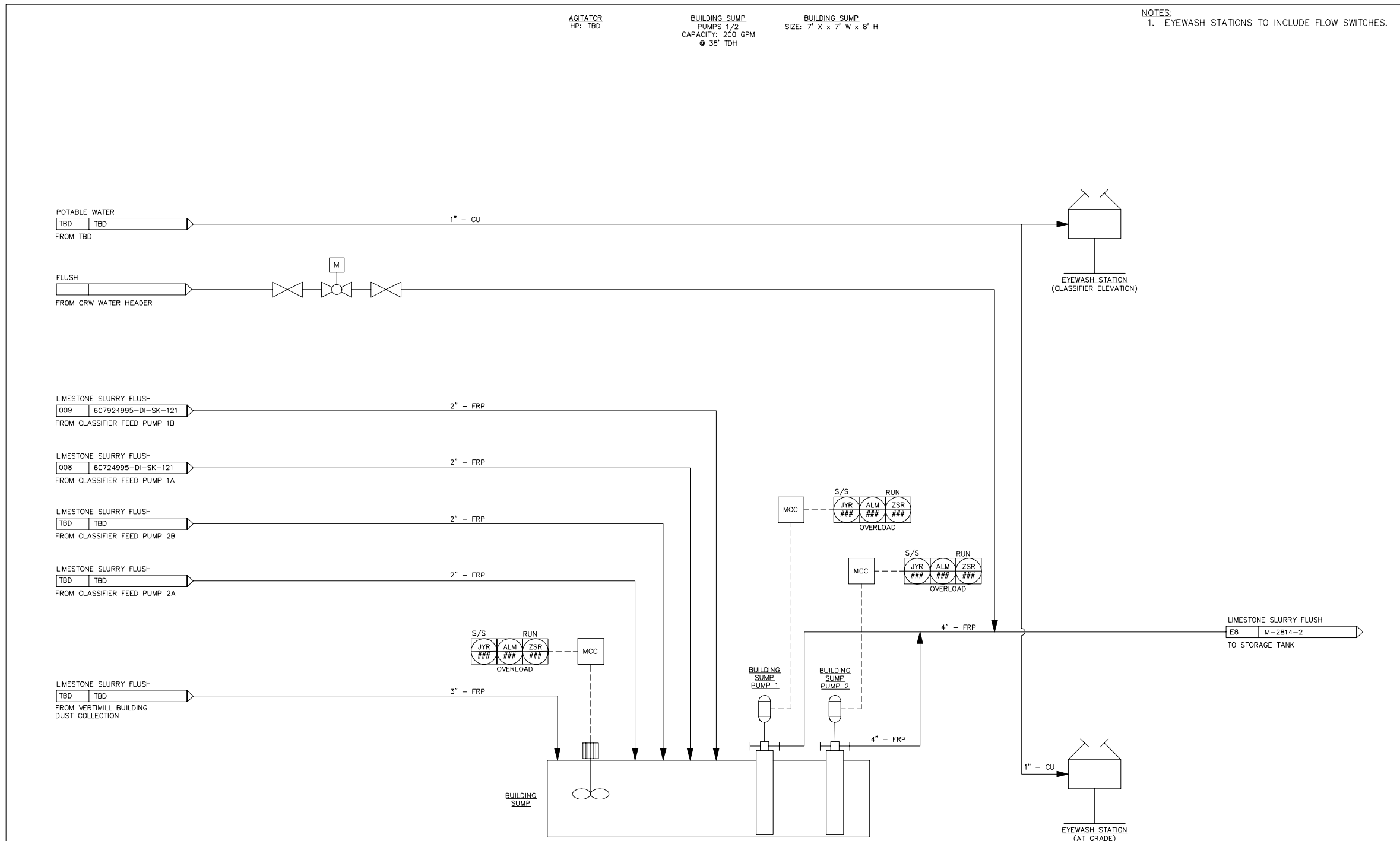
WFGD LIMESTONE CONVERSION  
 P&ID  
 REAGENT PREP

**SHEET NUMBER**

60724995-DI-SK-122

ARCH D 24" x 36"  
 Approved: \_\_\_\_\_  
 Checked: \_\_\_\_\_  
 Designer: \_\_\_\_\_  
 Project Management Initials: \_\_\_\_\_

Last saved by: RYANRASHUSSEN(2024-07-10) Last Plotted: 2024-07-10  
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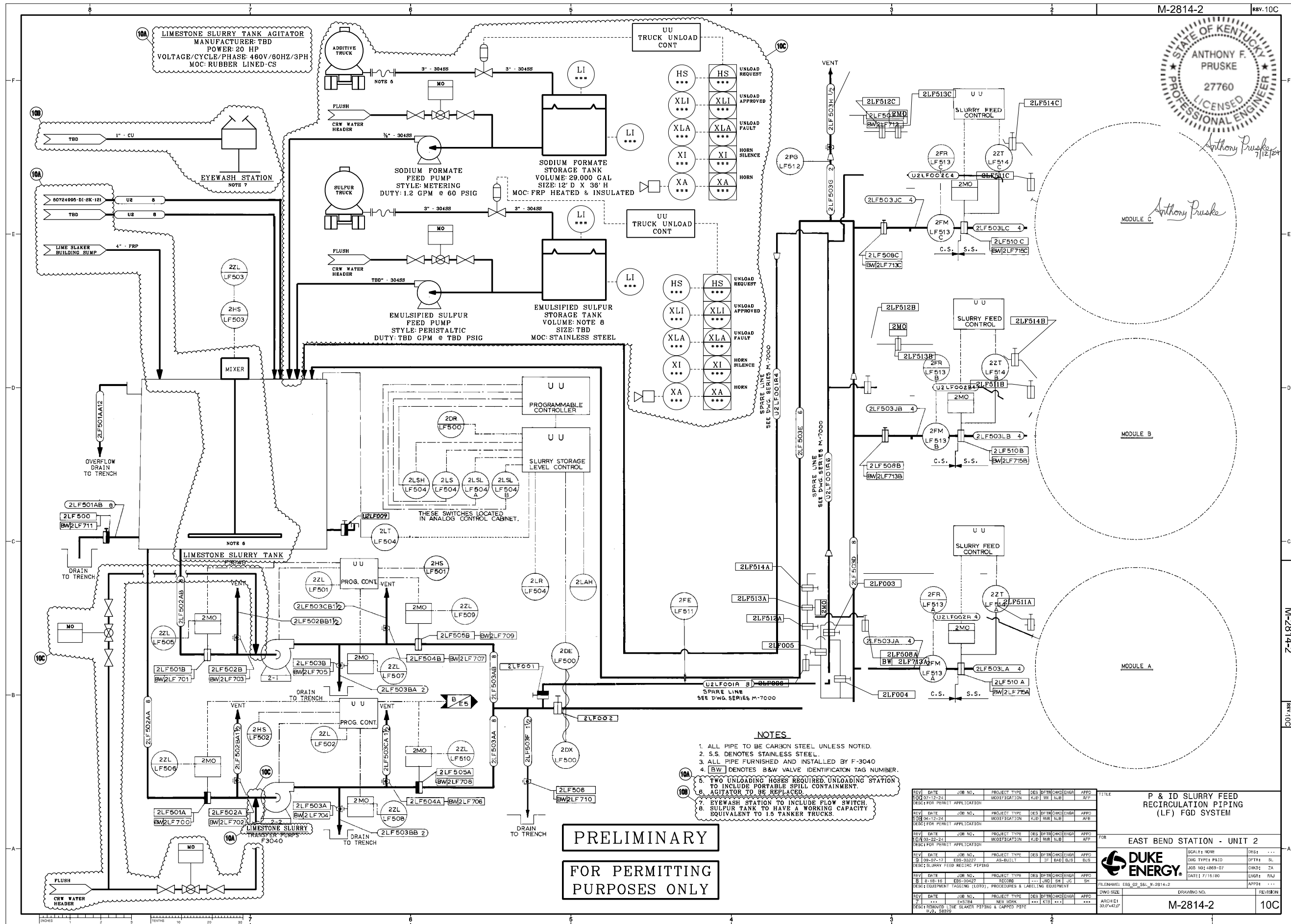
AGITATOR  
 HP: TBD

BUILDING SUMP  
 PUMPS: 1/2  
 CAPACITY: 200 GPM  
 @ 38' TDH

BUILDING SUMP  
 SIZE: 7' X 7' W x 8' H

**NOTES:**  
 1. EYEWASH STATIONS TO INCLUDE FLOW SWITCHES.

M-2814-2 REV.10C



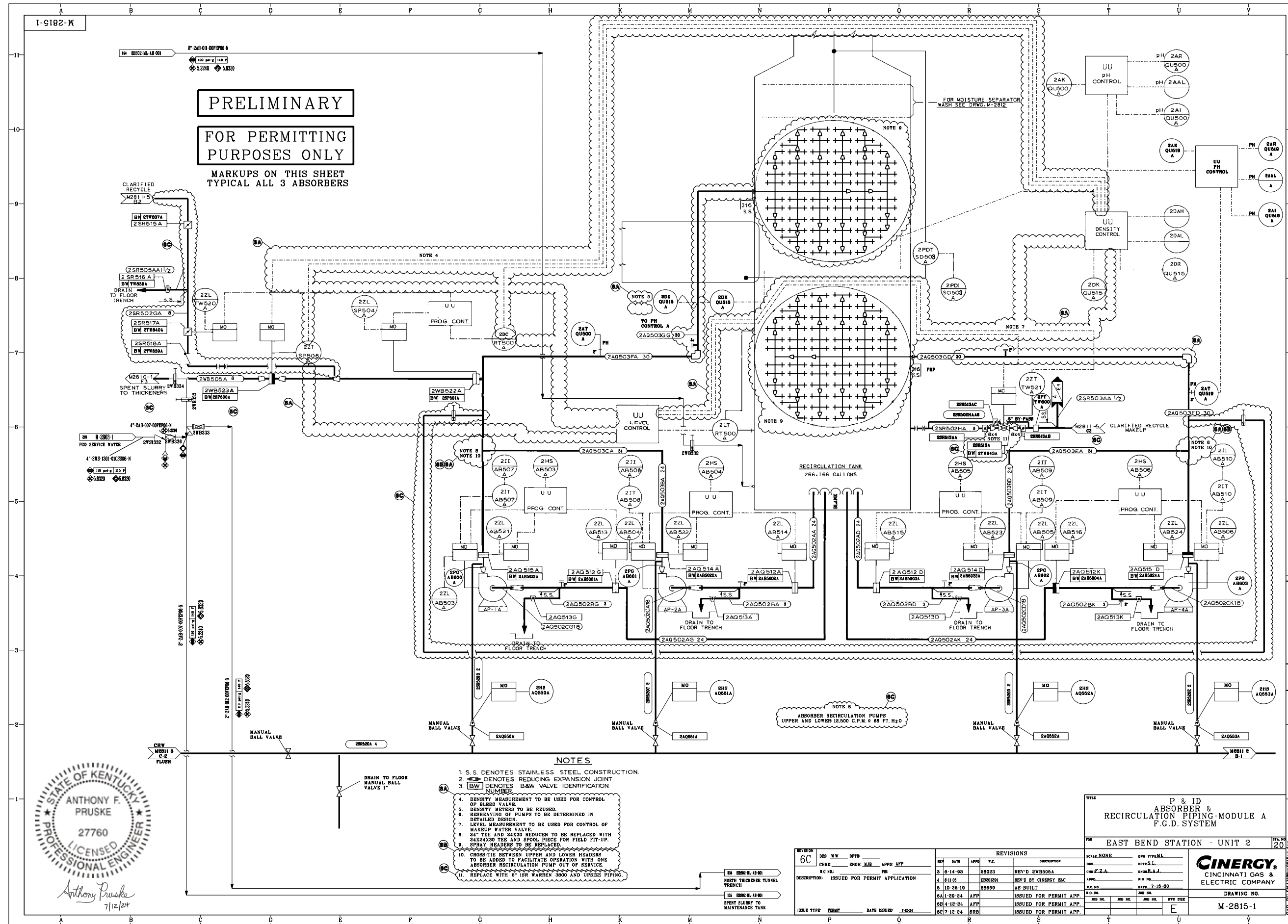
Anthony Pruska 7/12/24

Anthony Pruska

- NOTES**
1. ALL PIPE TO BE CARBON STEEL UNLESS NOTED.
  2. S.S. DENOTES STAINLESS STEEL.
  3. ALL PIPE FURNISHED AND INSTALLED BY F-3040
  4. [BW] DENOTES B&W VALVE IDENTIFICATION TAG NUMBER.
  5. TWO UNLOADING HOSES REQUIRED. UNLOADING STATION TO INCLUDE PORTABLE SPILL CONTAINMENT.
  6. AGITATOR TO BE REPLACED.
  7. BYWASH STATION TO INCLUDE FLOW SWITCH.
  8. SULFUR TANK TO HAVE A WORKING CAPACITY EQUIVALENT TO 1.5 TANKER TRUCKS.

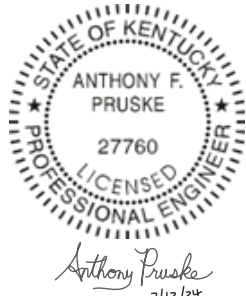
PRELIMINARY  
FOR PERMITTING  
PURPOSES ONLY

REV	DATE	JOB NO.	PROJECT TYPE	DES	DRN	CHKD	ENGR	APPR	TITLE
1	10/07-12-24		MODIFICATION	KJD	WR	SLB		AFP	P & ID SLURRY FEED RECIRCULATION PIPING (LF) FGD SYSTEM
DESC: FOR PERMIT APPLICATION									
2	09-07-17	ERS-0327	AS-BUILT	JP	BAJ	BLJ	BLJ	AFP	
DESC: SLURRY FEED RECIRC PIPING									FOR EAST BEND STATION - UNIT 2
1	04-22-24		MODIFICATION	KJD	RJR	SLB		AFP	
DESC: FOR PERMIT APPLICATION									DUKE ENERGY
1	04-22-24		PROJECT TYPE	DES <td>DRN <td>CHKD <td>ENGR <td>APPR </td></td></td></td>	DRN <td>CHKD <td>ENGR <td>APPR </td></td></td>	CHKD <td>ENGR <td>APPR </td></td>	ENGR <td>APPR </td>	APPR	
2	09-07-17	ERS-0327	AS-BUILT	JP	BAJ	BLJ	BLJ	AFP	
DESC: SLURRY FEED RECIRC PIPING									SCALE: NONE
1	11-18-10	ERS-0327	RECORD	...	...	...	...	...	
DESC: EQUIPMENT TAGGING (LOTO), PROCEDURES & LABELING EQUIPMENT									DATE: 7/15/80
1	...	...	...	...	...	...	...	...	
DESC: REMOVED THE SLAKER PIPING & CAPPED PIPE W.D. 8875									DRAWING NO. M-2814-2
1	...	...	...	...	...	...	...	...	
FILENAME: ERS_02_S&L_M-2814-2									REVISED
DWG SIZE ARCH E1 300x400									
DWM SIZE ARCH E1 300x400									10C



**PRELIMINARY**  
**FOR PERMITTING**  
**PURPOSES ONLY**  
 MARKUPS ON THIS SHEET  
 TYPICAL ALL 3 ABSORBERS

- NOTES**
1. S.S. DENOTES STAINLESS STEEL CONSTRUCTION.
  2. DENOTES REDUCING EXPANSION JOINT
  3. DENOTES B&W VALVE IDENTIFICATION NUMBER
  4. DENSITY MEASUREMENT TO BE USED FOR CONTROL OF BLEED VALVE.
  5. DENSITY METERS TO BE REUSED.
  6. REHAIVING OF PUMPS TO BE DETERMINED IN DETAILED DESIGN.
  7. LEVEL MEASUREMENT TO BE USED FOR CONTROL OF MAKEUP WATER VALVE.
  8. 24" TEE AND 24X30 REDUCER TO BE REPLACED WITH 24X24X30 TEE AND SPOOL PIECE FOR FIELD FIT-UP.
  9. SPRAY HEADERS TO BE REPLACED.
  10. CROSS-TIE BETWEEN UPPER AND LOWER HEADERS TO BE ADDED TO FACILITATE OPERATION WITH ONE ABSORBER RECIRCULATION PUMP OUT OF SERVICE.
  11. REPLACE WITH 6" ISR WARE 3808 AND UPSIZE PIPING.



**TITLE**  
 P & ID  
 ABSORBER &  
 RECIRCULATION PIPING-MODULE A  
 P.G.D. SYSTEM

FOR EAST BEND STATION - UNIT 2

SCALE: NONE  
 DESIGNED BY: [blank]  
 CHECKED BY: [blank]  
 APPROVED BY: [blank]

**CINERGY**  
 CINCINNATI GAS &  
 ELECTRIC COMPANY

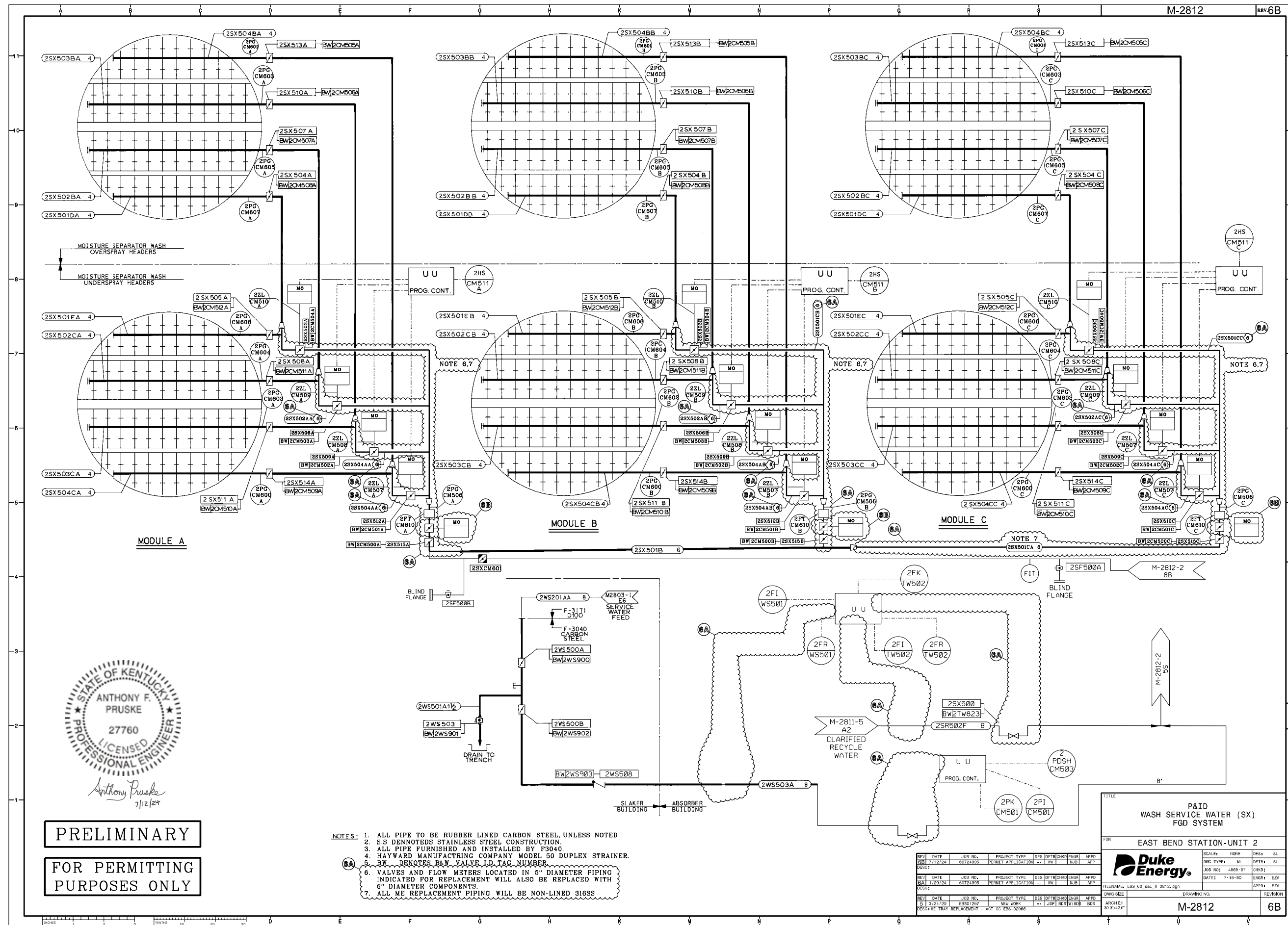
DRAWING NO. M-2815-1

REVISIONS	
NO.	DESCRIPTION
3	10-14-93 58023 REV'D 2WB506A
4	8-11-05 08201291 REV'D BY CINERGY EIC
5	10-25-19 086600 AS-BUILT
6A	1-29-24 APP ISSUED FOR PERMIT APP.
6B	4-12-24 APP ISSUED FOR PERMIT APP.
6C	7-12-24 BRB ISSUED FOR PERMIT APP.

DESIGN: M.W. DPTR  
 CHECKED: ENGR. MJB APPD: APP  
 DESCRIPTION: ISSUED FOR PERMIT APPLICATION  
 ISSUE TYPE: PERMIT DATE ISSUED: 7.12.24







*Anthony Pruske*  
7/12/24

**PRELIMINARY**  
**FOR PERMITTING PURPOSES ONLY**

- NOTES:
1. ALL PIPE TO BE RUBBER LINED CARBON STEEL, UNLESS NOTED
  2. S.S DENOTEDS STAINLESS STEEL CONSTRUCTION.
  3. ALL PIPE FURNISHED AND INSTALLED BY F3040.
  4. HAYWARD MANUFACTURING COMPANY MODEL 50 DUPLEX STRAINER.
  5. BW DENOTES B&W VALVE I.D. TAG NUMBER.
  6. VALVES AND FLOW METERS LOCATED IN 5" DIAMETER PIPING INDICATED FOR REPLACEMENT WILL ALSO BE REPLACED WITH 6" DIAMETER COMPONENTS.
  7. ALL ME REPLACEMENT PIPING WILL BE NON-LINED 316SS

REV	DATE	JOB NO.	PROJECT TYPE	DES	CHKD	ENGR	APPR
01	7/12/24	60724895	PERMIT APPLICATION	WW	WW	MLJ	AFB
02	7/12/24	60724895	PERMIT APPLICATION	WW	WW	MLJ	AFB
03	7/24/24	60724895	NEW WORK	WW	WW	MLJ	AFB

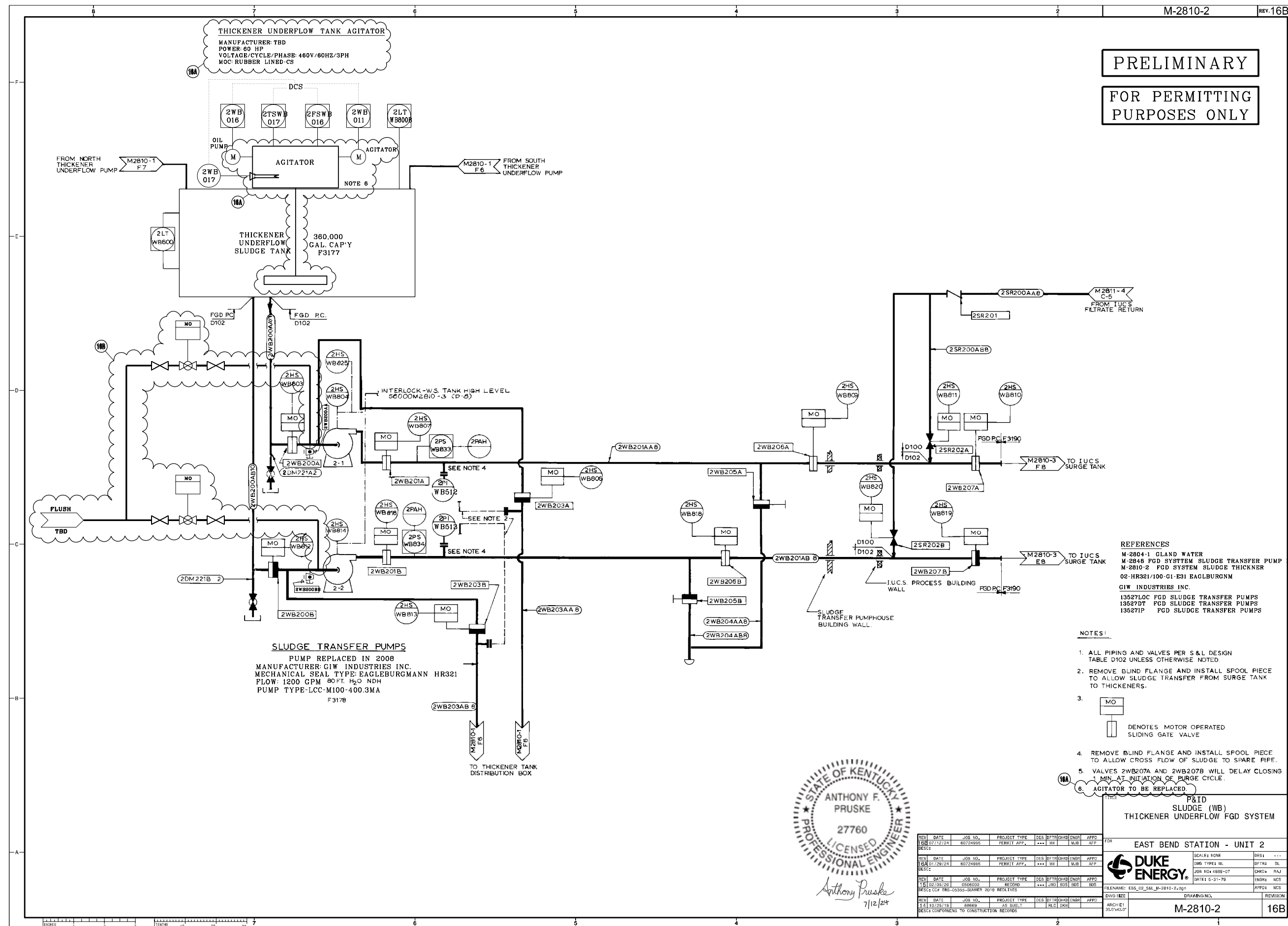
TITLE  
**P&ID WASH SERVICE WATER (SX) FGD SYSTEM**

FOR  
**EAST BEND STATION-UNIT 2**

SCALE: NONE  
DWG TYPE: ML  
JOB NO: 4868-07  
DATE: 7-15-20  
ENGR: EZA  
APPR: EZA

FILENAME: ESS\_02\_8&1\_B-2812.dgn

DWG SIZE: ARCH E1  
DRAWING NO: **M-2812**  
REVISION: **6B**



**PRELIMINARY**  
**FOR PERMITTING**  
**PURPOSES ONLY**



*Anthony Pruske*  
 7/12/24

REV	DATE	JOB NO.	PROJECT TYPE	DES	DR	CHK	ENGR	APPD
1	07/12/24	80724995	PERMIT APP.	***	WV	WV	WV	APP
2	07/29/24	80724995	PERMIT APP.	**	WV	WV	WV	APP
3	02/09/25	8096003	REC'D	**	WV	WV	WV	APP
4	10/25/19	88669	AS BUILT					

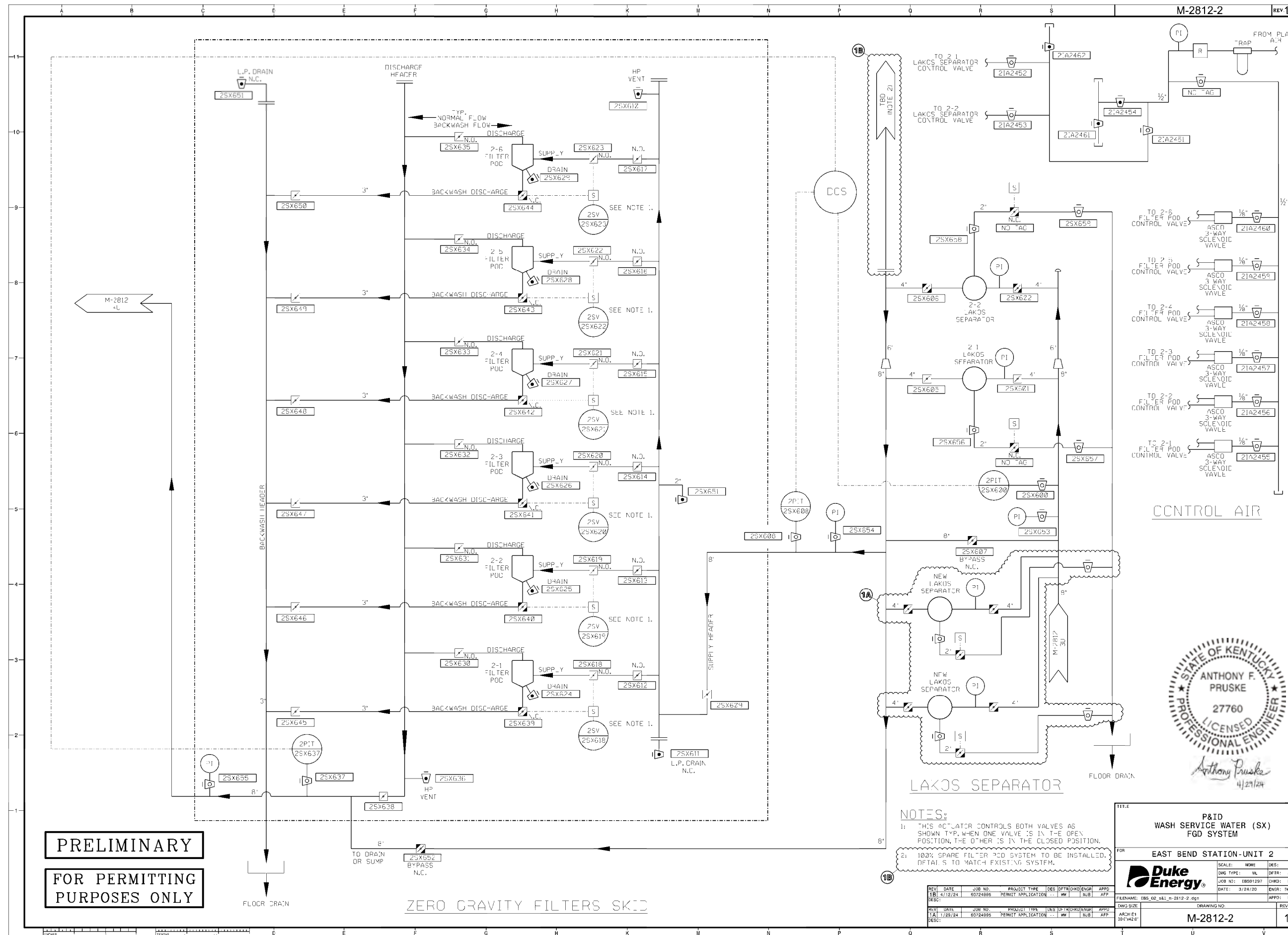
**P&ID**  
**SLUDGE (WB)**  
**THICKENER UNDERFLOW FGD SYSTEM**

FOR  
**EAST BEND STATION - UNIT 2**

**DUKE ENERGY**

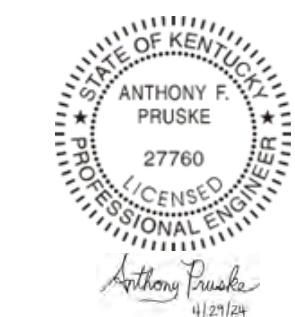
SCALE: NONE  
 DWG TYPES: ML  
 JOB NO: 4869-07  
 DATE: 5-31-79  
 FILENAME: ESS\_02\_S&L\_M-2810-2.dgn

DWG NO: M-2810-2  
 SHEET: 16B



**PRELIMINARY**  
**FOR PERMITTING**  
**PURPOSES ONLY**

ZERO GRAVITY FILTERS SKID



**NOTES:**  
 1: THIS ACTUATOR CONTROLS BOTH VALVES AS SHOWN TYP. WHEN ONE VALVE IS IN THE OPEN POSITION, THE OTHER IS IN THE CLOSED POSITION.  
 2: 100% SPARE FILTER POD SYSTEM TO BE INSTALLED. DETAILS TO MATCH EXISTING SYSTEM.

TITLE		P&ID WASH SERVICE WATER (SX) FGD SYSTEM	
FOR		EAST BEND STATION-UNIT 2	
SCALE:	NONE	DES:	...
DWG TYPE:	WL	DRTR:	JOP
JOB NO.:	88801297	CHWD:	BOS
DATE:	3/24/20	ENGR:	TR/BOS
APPD:	BOS	APPD:	BOS
FILENAME:	EBS_02_s&l_m-2812-2.dgn		
DWG SIZE:	DRAWING NO. M-2812-2		
ARCH'ER:	1B		

REV	DATE	JOB NO.	PROJECT TYPE	DES	DRTR	ENGR	APPD
1B	4/12/24	60724895	PERMIT APPLICATION	...	...	...	...
1A	1/28/24	60724895	PERMIT APPLICATION	...	...	...	...



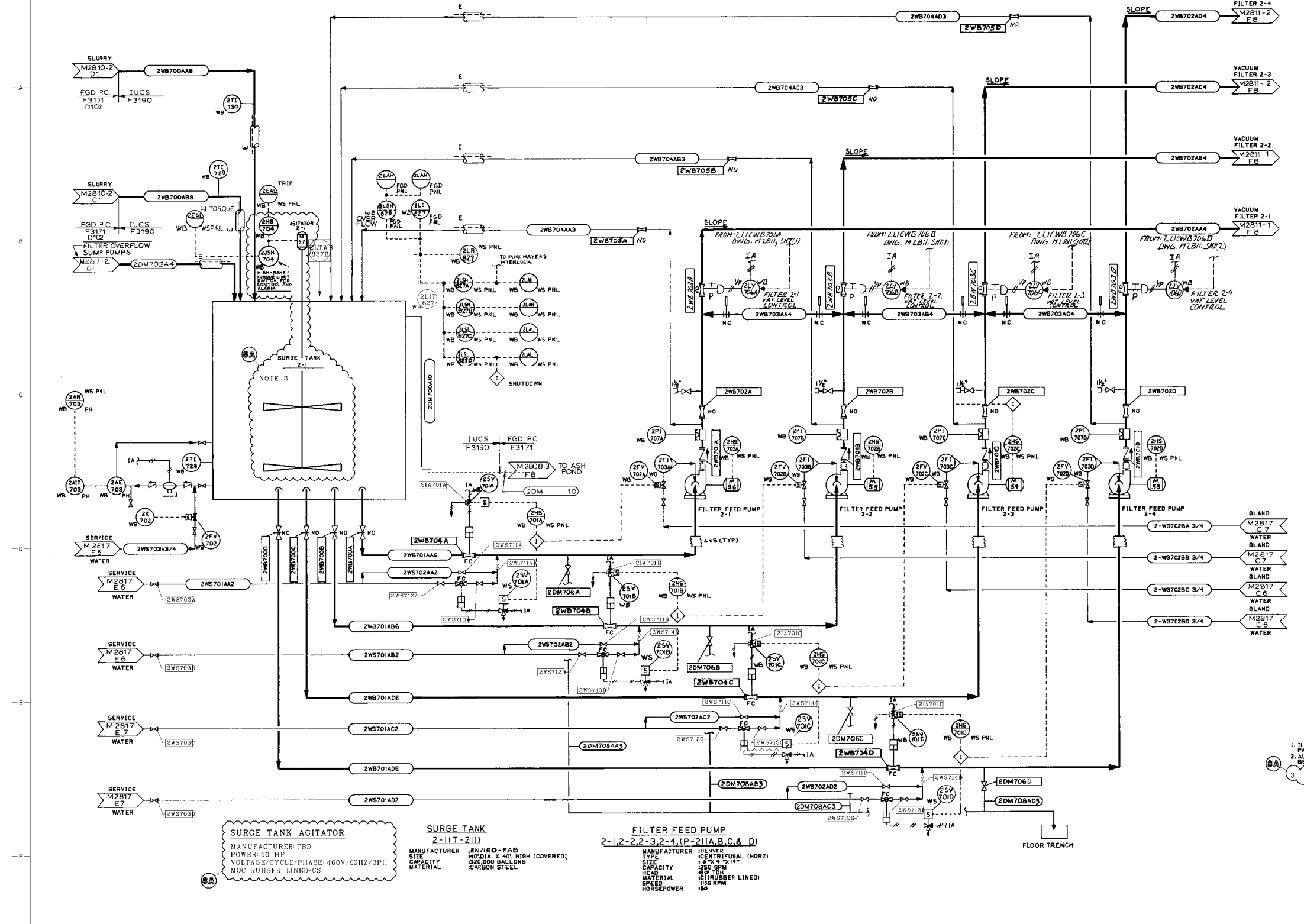
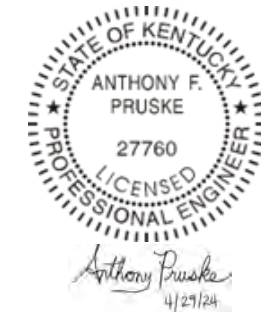
M-2810-3

REV 8A

M-2810-3

REV 8A

PRELIMINARY  
FOR PERMITTING  
PURPOSES ONLY



**SURGE TANK AGITATOR**  
MANUFACTURER: TBD  
POWER: 50 HP  
VOLTAGE/CYCLE/PHASE: 1460V/60HZ/3PH  
MOC: RUBBER LINED-CS

**SURGE TANK**  
2-(11T-211)  
MANUFACTURER: ENVIRO-FAB  
TYPE: MAG  
SIZE: 40" DIA. x 40' HIGH (COVERED)  
CAPACITY: 340,000 GALLONS  
MATERIAL: CARBON STEEL

**FILTER FEED PUMP**  
2-1, 2-2, 2-3, 2-4, (P-211A, B, C, D)  
MANUFACTURER: DENVER  
TYPE: CENTRIFUGAL (HORIZONTAL)  
SIZE: 24" x 24" x 11"  
CAPACITY: 350 GPM  
HEAD: 87' TDH  
MATERIAL: C (RUBBER LINED)  
SPEED: 1150 RPM  
HORSEPOWER: 150

- NOTES
- 1. IUCS EQUIPMENT NUMBERS ARE IN PARENTHESES
- 2. ALL ABOVE GROUND OUTSIDE LINES TO BE TRACED AND INSULATED.
- 3. AGITATOR TO BE REPLACED

REFERENCE DRAWINGS

DWG. NO.	TITLE

REDRAWN FROM IUCS DRAWING 2213-P-203

NO.	DESCRIPTION	CHNG	APPROV	DATE	ISSUED FOR	ACTV
7	PERMIT APPLICATION			01/28/24		
8	DWG REDLINES - SUMMER 2020 (LOTO) CONFORMING TO CONST REF			11/05/20	N/A	ERS-065:4 FRS-054:4

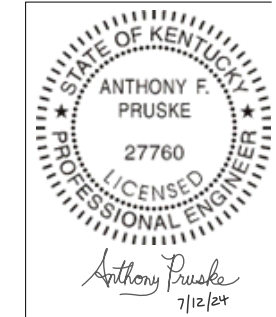
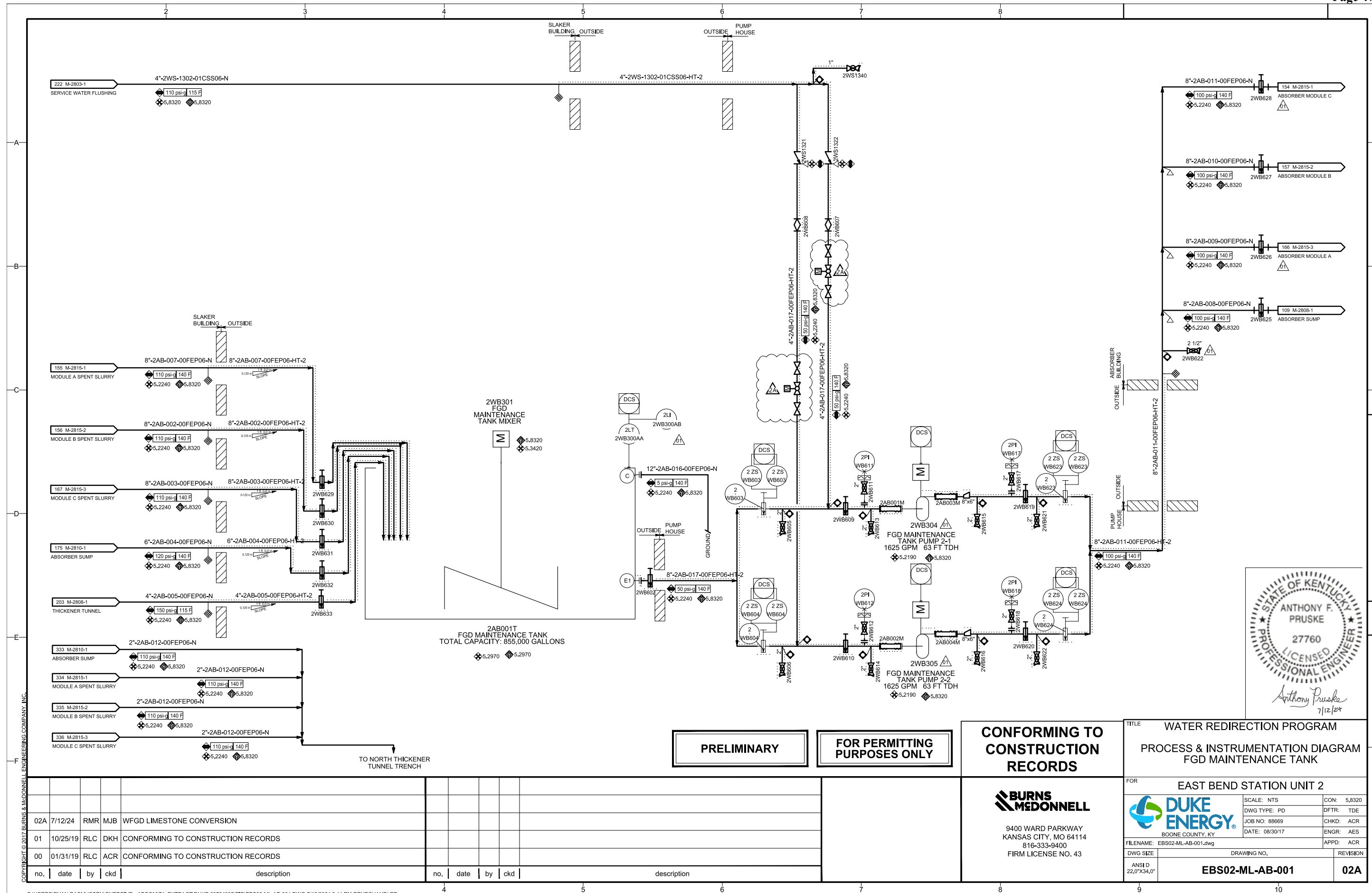
  

NO.	DESCRIPTION	CHNG	APPROV	DATE	ISSUED FOR	ACTV

EAST BEND STATION UNIT 2			
FOSSIL HYDRO OPERATIONS			
FACTORY	UNIT	SYSTEM	DWG. SHEET
EBS	02	TBD	ML
PROJECT NO.	CC NO.	W.D. NO.	APPROVED BY
			CS
SCALE	PLOT	SIZE	ARCHIT. APPRO. DATE
NONE	1=1	42"x30"	12-14-79

PROCESS & INSTRUMENT DIAGRAM  
SLURRY SURGE & FEED TANK

DWG. NO. M-2810-3  
REV. 8A



**PRELIMINARY**

**FOR PERMITTING PURPOSES ONLY**

**CONFORMING TO CONSTRUCTION RECORDS**

TITLE: WATER REDIRECTION PROGRAM  
PROCESS & INSTRUMENTATION DIAGRAM  
FGD MAINTENANCE TANK

FOR: EAST BEND STATION UNIT 2

SCALE: NTS  
CON: 5,8320  
DWG TYPE: PD  
DFTR: TOE  
JOB NO: 88669  
CHKD: ACR  
DATE: 08/30/17  
ENGR: AES  
APPD: ACR

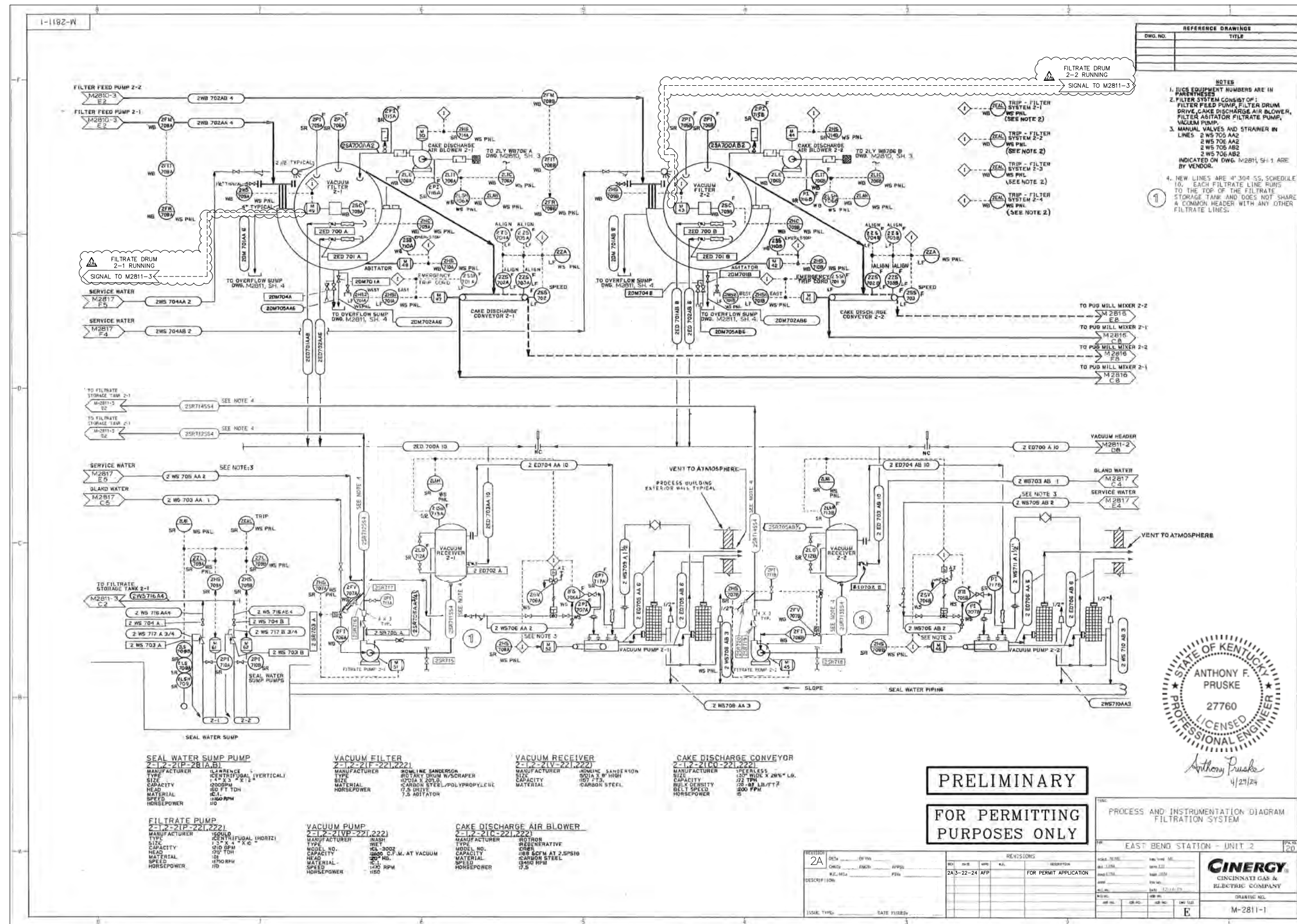
FILENAME: EBS02-ML-AB-001.dwg  
DRAWING NO.  
ANSI D 22,0"X34,0"  
**EBS02-ML-AB-001**

REVISION  
**02A**

**BURNS & MCDONNELL**  
9400 WARD PARKWAY  
KANSAS CITY, MO 64114  
816-333-9400  
FIRM LICENSE NO. 43

no.	date	by	ckd	description
02A	7/12/24	RMR	MJB	WFGD LIMESTONE CONVERSION
01	10/25/19	RLC	DKH	CONFORMING TO CONSTRUCTION RECORDS
00	01/31/19	RLC	ACR	CONFORMING TO CONSTRUCTION RECORDS





REFERENCE DRAWINGS	
DWG. NO.	TITLE

- NOTES**
1. IUCS EQUIPMENT NUMBERS ARE IN PARENTHESES
  2. FILTER SYSTEM CONSISTS OF: FILTER FEED PUMP, FILTER DRUM DRIVE, CAKE DISCHARGE AIR BLOWER, FILTER ASATOR, FILTER PUMP, VACUUM PUMP.
  3. MANUAL VALVES AND STRAINER IN LINES: 2 WS 705 AA2, 2 WS 705 AA2, 2 WS 705 AB2, 2 WS 705 AB2 INDICATED ON DWG. M2811, SH-1 ARE BY VENDOR.
  4. NEW LINES ARE 4" 304 SS, SCHEDULE 10. EACH FILTRATE LINE RUNS TO THE TOP OF THE FILTRATE STORAGE TANK AND DOES NOT SHARE A COMMON HEADER WITH ANY OTHER FILTRATE LINES.

**PRELIMINARY**  
**FOR PERMITTING**  
**PURPOSES ONLY**



**SEAL WATER SUMP PUMP**  
2-1, 2-2 (P-2R1A, B)  
MANUFACTURER: BARNETT  
TYPE: CENTRIFUGAL (VERTICAL)  
SIZE: 14" X 3" X 13"  
CAPACITY: 200 GPM  
HEAD: 80 FT TDH  
MATERIAL: 304 SS  
SPEED: 1750 RPM  
HORSEPOWER: 1/2

**FILTRATE PUMP**  
2-1, 2-2 (P-221, 222)  
MANUFACTURER: BULLOCH  
TYPE: CENTRIFUGAL (HORIZONTAL)  
SIZE: 14" X 3" X 13"  
CAPACITY: 200 GPM  
HEAD: 80 FT TDH  
MATERIAL: 304 SS  
SPEED: 1750 RPM  
HORSEPOWER: 1/2

**VACUUM FILTER**  
2-1, 2-2 (F-221, 222)  
MANUFACTURER: KROME SANDERSON  
TYPE: ROTARY DRUM W/SCRAPER  
SIZE: 120" X 20' 6"  
MATERIAL: CARBON STEEL/POLYPROPYLENE  
HORSEPOWER: 7.5

**VACUUM PUMP**  
2-1, 2-2 (VP-221, 222)  
MANUFACTURER: BUSH  
TYPE: WASH  
MODEL NO.: VCL-3002  
CAPACITY: 3000 C.F.M. AT VACUUM  
MATERIAL: 304 SS  
SPEED: 1400 RPM  
HORSEPOWER: 1/2

**VACUUM RECEIVER**  
2-1, 2-2 (V-221, 222)  
MANUFACTURER: KROME SANDERSON  
TYPE: ROTARY DRUM W/SCRAPER  
SIZE: 120" X 20' 6"  
MATERIAL: CARBON STEEL  
HORSEPOWER: 7.5

**CAKE DISCHARGE AIR BLOWER**  
2-1, 2-2 (C-221, 222)  
MANUFACTURER: ROTRON  
TYPE: REGENERATIVE  
MODEL NO.: ORR  
CAPACITY: 100 CFM AT 2.5PSIG  
MATERIAL: CARBON STEEL  
SPEED: 1800 RPM  
HORSEPOWER: 7.5

REVISION	DATE	BY	APP'D	DESCRIPTION
2A				

PROCESS AND INSTRUMENTATION DIAGRAM  
FILTRATION SYSTEM

EAST BEND STATION - UNIT 2

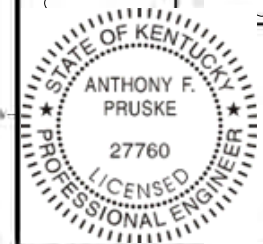
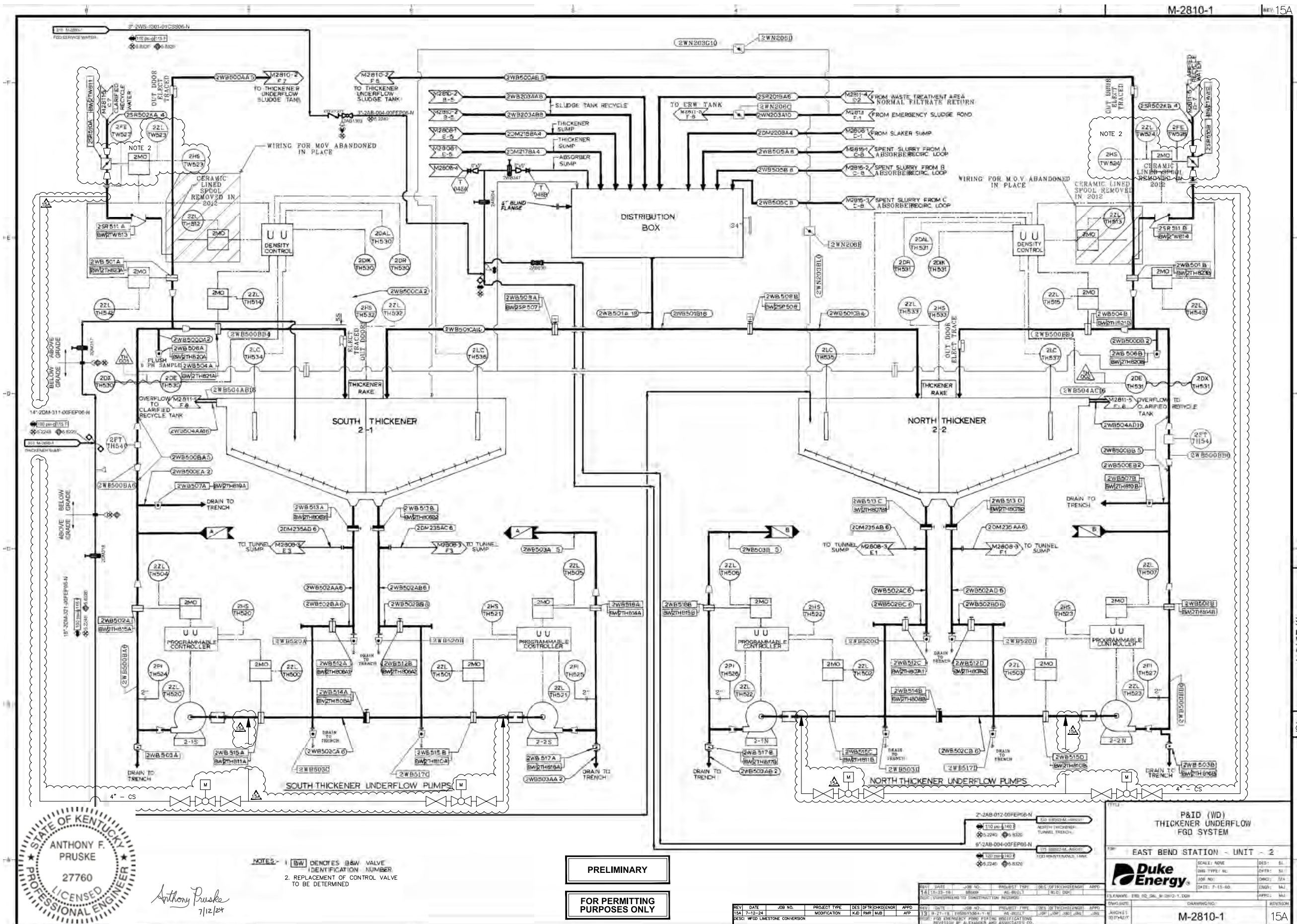
NO.	DATE	BY	APP'D	DESCRIPTION
2A-3-22-24				FOR PERMIT APPLICATION



DRIVING NO. M-2811-1







*Anthony Pruske*  
7/12/24

NOTES - 1. BW DENOTES B&W VALVE IDENTIFICATION NUMBER  
2. REPLACEMENT OF CONTROL VALVE TO BE DETERMINED

PRELIMINARY  
FOR PERMITTING PURPOSES ONLY

P&ID (WD)  
THICKENER UNDERFLOW  
FGD SYSTEM

EAST BEND STATION - UNIT - 2

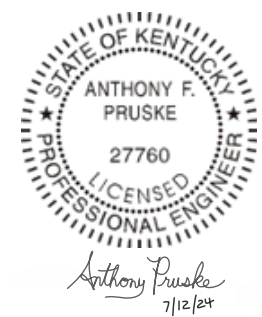
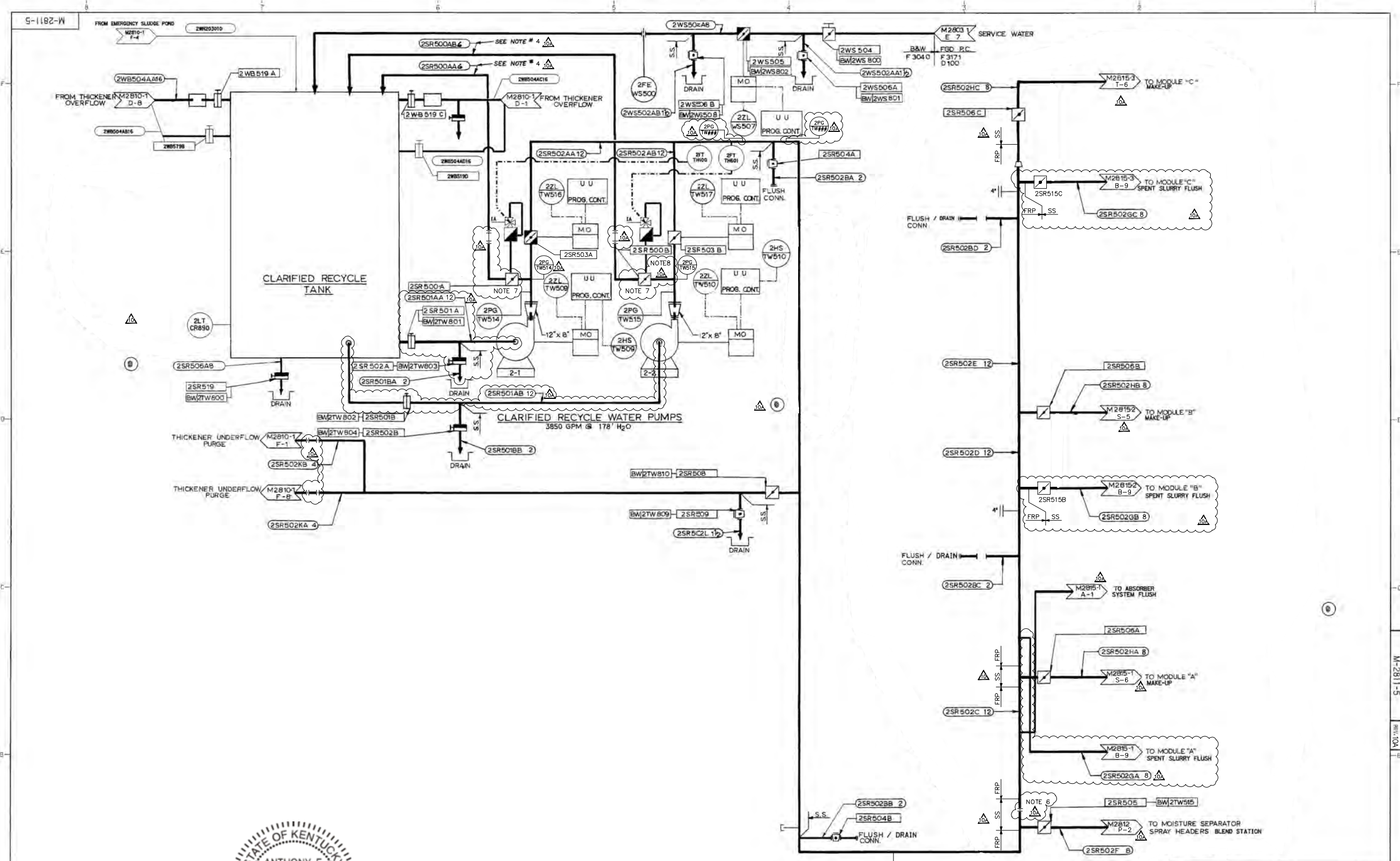
Duke Energy

SCALE: NONE  
DES: BL  
DWG TYPE: WL  
DSCR: M  
JOB NO: 244  
DATE: 7-15-24  
APP: M  
REV: M

DRWING NO: M-2810-1  
15A

REV	DATE	JOB NO.	PROJECT TYPE	DES	DTR	CHK	ENGR	APP	REV	DATE	JOB NO.	PROJECT TYPE	DES	DTR	CHK	ENGR	APP
1	7-15-24	244	FGD SYSTEM	M					1	7-15-24	244	FGD SYSTEM	M				
2	7-15-24	244	FGD SYSTEM	M					2	7-15-24	244	FGD SYSTEM	M				





PRELIMINARY

FOR PERMITTING PURPOSES ONLY

- NOTES**
1. S.S. DENOTES STAINLESS STEEL CONSTRUCTION.
  2. DENOTES REDUCING EXPANSION JOINT.
  3. DENOTES B&W VALVE IDENTIFICATION TAG NUMBER.
  4. FOR DESCRIPTION OF LINES # 2SR500AA & 2SR500AB AND VALVES # 2SR500A & 2SR500B SEE DRAWINGS 54000M063 THRU 54000M065 (BLM 1-54003-1497).
  5. DELETED.
  6. ORIFICE SHOULD BE REMOVED AND REPLACED WITH PADDLE SPACER AS NECESSARY.
  7. REPLACE IN KIND.
  8. 3" CONNECTION TO BE REPLACED.

REV	DATE	BY	CHKD	APPD	DESCRIPTION
10A					
1	3-13-85	RSD	SRD	SRD	REMOVED EX THICKENER
2	3-29-85	DNV	SRD	SRD	ADJUSTED LINE
3	8-11-05	BDW	EB201281	EB201281	REPAIRS LINE SLABER
4					REPAIRING & VALVES
5					REVD BY CINERGY E&C
6					FGD UPGRADES

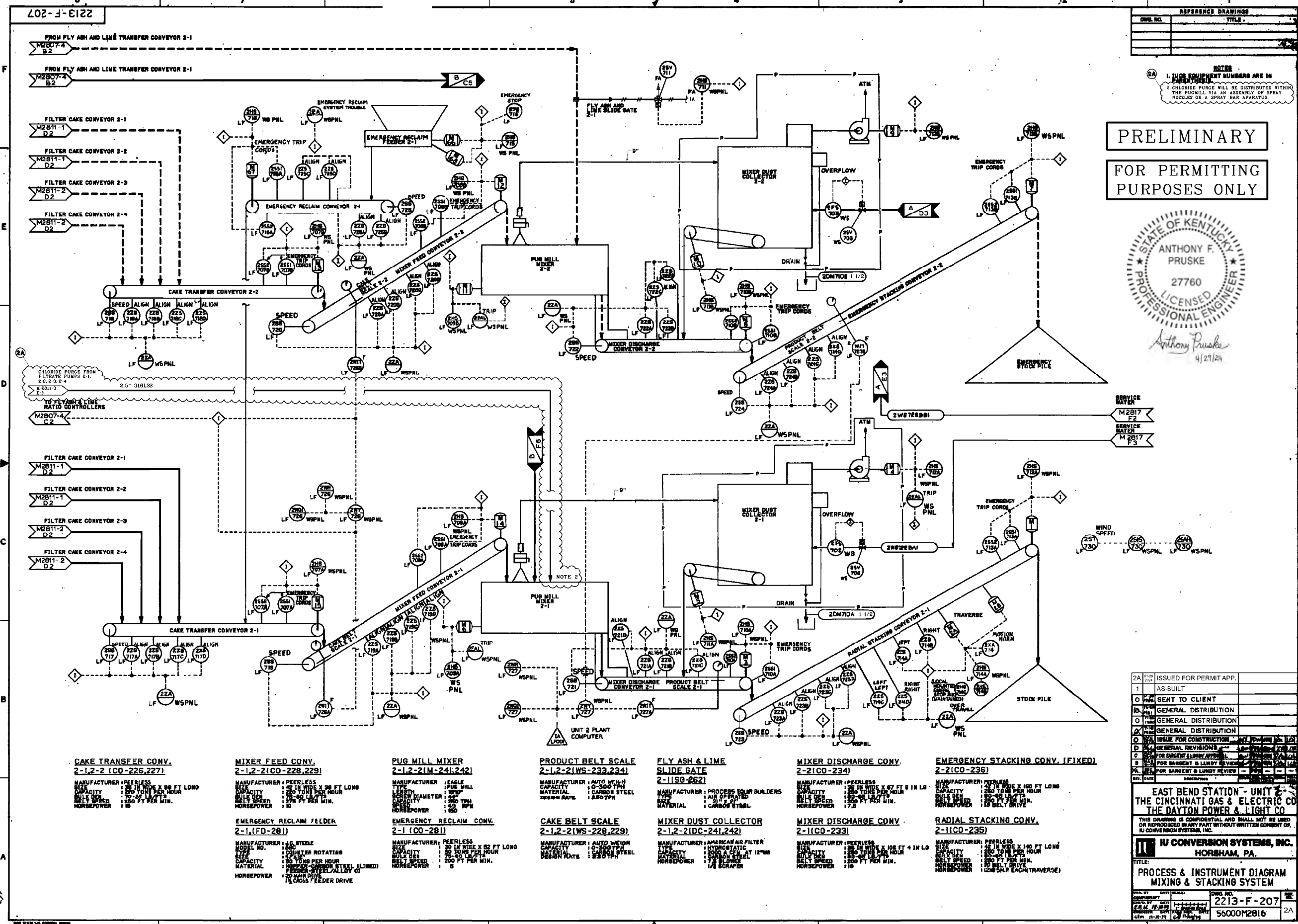
P & ID  
CLARIFIED RECYCLE (SR)  
FGD SYSTEM

EAST BEND STATION UNIT - 2

REVISED BY	DATE	REVISED BY	DATE

**CINERGY**  
CINCINNATI GAS & ELECTRIC COMPANY

DRAWING NO. M-2811-5



REFERENCE DRAWINGS	
DRAW. NO.	TITLE

**NOTES**

1. ALL EQUIPMENT NUMBERS ARE IN CAPS.

2. CHLORIDE PURGE WILL BE DISTRIBUTED WITHIN THE PUGMILL VIA AN ASSEMBLY OF SPRAY NOZZLES OR A SPRAY BAR APARATUS.

**PRELIMINARY**

**FOR PERMITTING PURPOSES ONLY**



*Anthony Pruske*  
4/21/24

**CAKE TRANSFER CONV.**  
2-1,2-2 (CO-226,227)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 90 FT LONG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110

**MIXER FEED CONV.**  
2-1,2-2 (CO-228,229)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 90 FT LONG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110

**PUG MILL MIXER**  
2-1,2-2 (M-241,242)

MANUFACTURER: EAGLE  
TYPE: PUG MILL  
LENGTH: 90 FT  
SCREW DIAMETER: 36 IN  
CAPACITY: 200 TPH  
SPEED: 30 RPM  
HORSEPOWER: 80

**PRODUCT BELT SCALE**  
2-1,2-2 (WS-233,234)

MANUFACTURER: AUTO WEIGH  
CAPACITY: 0-300 TPH  
MATERIAL: CARBON STEEL  
DESIGN RATE: 1,800 TPH

**FLY ASH & LIME SLIDE GATE**  
2-11SB-262

MANUFACTURER: PROCESS EQUIP BUILDERS  
TYPE: AIR OPERATED  
SIZE: 24 IN WIDE X 12 FT  
MATERIAL: CARBON STEEL

**MIXER DISCHARGE CONV.**  
2-2 (CO-234)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 67 FT 8 IN LG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110

**EMERGENCY STACKING CONV. (FIXED)**  
2-2 (CO-236)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 140 FT LONG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110 BELT DRIVE

**EMERGENCY RECLAIM FEEDER**  
2-1, (FD-281)

MANUFACTURER: IFC STEELE  
MODEL NO.: 1200  
TYPE: COUNTER ROTATING  
SIZE: 30 IN WIDE X 120 FT  
CAPACITY: 60 TONS PER HOUR  
MATERIAL: PEERLESS STEEL (LINED)  
HORSEPOWER: 20 MAIN DRIVE  
1 CROSS FEEDER DRIVE

**EMERGENCY RECLAIM CONV.**  
2-1 (CO-281)

MANUFACTURER: PEERLESS  
MODEL NO.: 1200  
TYPE: COUNTER ROTATING  
SIZE: 30 IN WIDE X 120 FT  
CAPACITY: 60 TONS PER HOUR  
MATERIAL: PEERLESS STEEL (LINED)  
HORSEPOWER: 8

**CAKE BELT SCALE**  
2-1,2-2 (WS-228,229)

MANUFACTURER: AUTO WEIGH  
CAPACITY: 0-300 TPH  
MATERIAL: CARBON STEEL  
DESIGN RATE: 1,800 TPH

**MIXER DUST COLLECTOR**  
2-1,2-2 (DC-241,242)

MANUFACTURER: AMERICAN AIR FILTER  
TYPE: HYDROSTATIC  
CAPACITY: 200 TONS PER HOUR  
MATERIAL: CARBON STEEL  
HORSEPOWER: 1/2 SCRAPER

**MIXER DISCHARGE CONV.**  
2-1 (CO-233)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 106 FT 4 IN LG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110

**RADIAL STACKING CONV.**  
2-1 (CO-235)

MANUFACTURER: PEERLESS  
SIZE: 24 IN WIDE X 140 FT LONG  
CAPACITY: 120 TONS PER HOUR  
BELT SPEED: 200 FT PER MIN.  
HORSEPOWER: 110 BELT DRIVE

2A	ISSUED FOR PERMIT APP.	
1	AS-BUILT	
0	SENT TO CLIENT	
0	GENERAL DISTRIBUTION	
0	GENERAL DISTRIBUTION	
0	GENERAL DISTRIBUTION	
0	ISSUE FOR CONSTRUCTION	
0	GENERAL REVISIONS	
0	FOR BARGENT & LUNDY REVIEW	
0	FOR BARGENT & LUNDY REVIEW	
0	FOR BARGENT & LUNDY REVIEW	

**EAST BEND STATION - UNIT 2**  
**THE CINCINNATI GAS & ELECTRIC CO**  
**THE DAYTON POWER & LIGHT CO**

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**IU CONVERSION SYSTEMS, INC.**  
HORSHAM, PA.

TITLE: **PROCESS & INSTRUMENT DIAGRAM MIXING & STACKING SYSTEM**

DATE	BY	SCALE	DWG. NO.
			2213-F-207
			56000M2816

## Appendix D - Electrical Load List

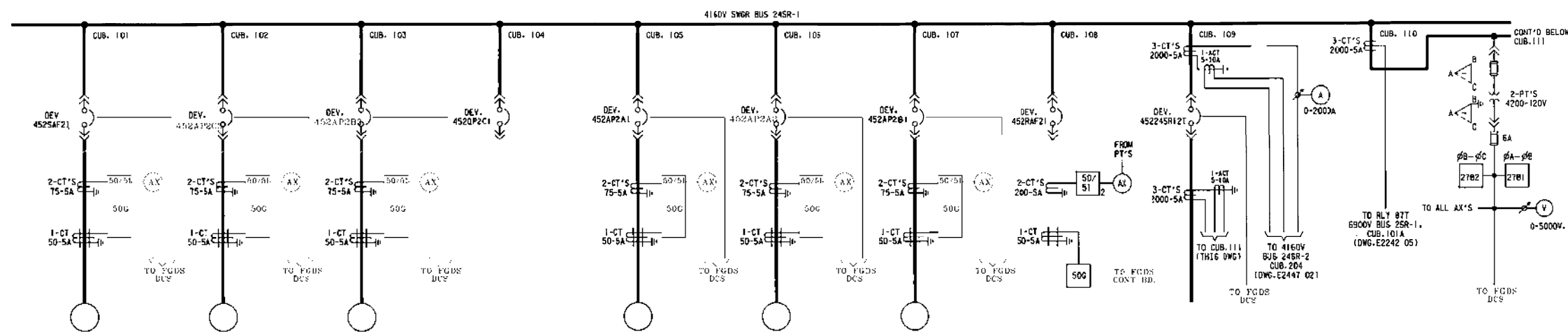


Duke East Bend  
Reagent Conversion Study  
Preliminary Load List

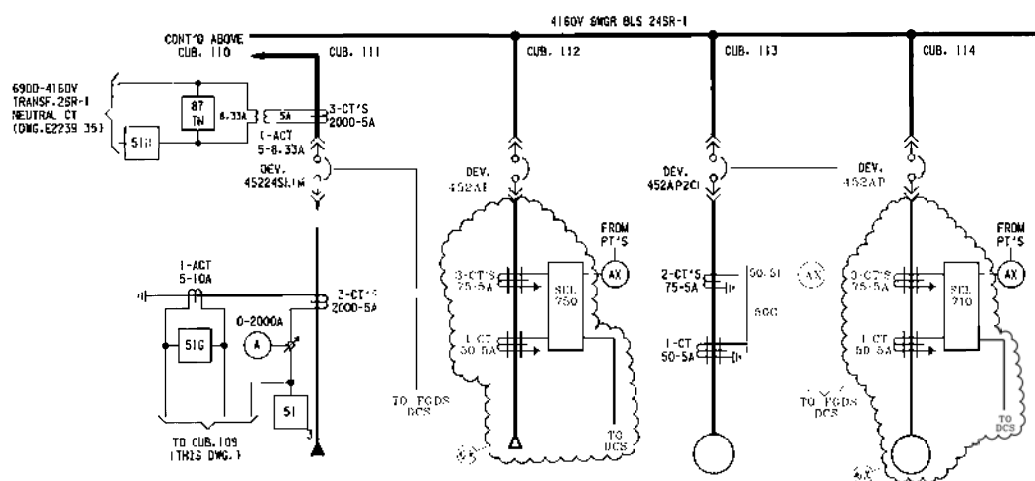
REV NO.	REVISION	DATE	DOC:	ELECTRICAL LOAD LIST	CONNECTED HP		3725.50
A	Review	6/17/2022	CLIENT:	Duke Energy	CONNECTED KVA		3554.40
B	Preliminary	7/18/2022	PROJECT:	East Bend Limestone Conversion	CONNECTED KW		3198.96
			JOB NUMBER:	60680586	OPERATING KVA		1553.43
					VOLT		480
					OPERATING AMPS		1868

ITEM	INSTALLED AREA	SYSTEM	DESCRIPTION	TYPE (Motor, Feeder or Actuator)	CONT. LOAD AMPS	1 or 3 PH	Voltage	CONN. HP	FULL LOAD AMPS	EFF	PF	STATIC KVA	CONN. KVA	CONN. KW	DEMAND FACTOR	OPERATING KVA	VFD (Y or N)	STARTER SIZE	BREAKER SIZE	CONTROL STATION (HOA, ETC)	DCS (Y or N)	FED FROM	COMMENTS
1	Reagent	Reagent Prep	Vertimill A Drive Motor			3	4160	1000	121.1	0.95	0.9		871.5	784.3	0.8	697.2	N				Y	24-SR1	Existing breaker
2	Reagent	Reagent Prep	Vertimill B Drive Motor			3	4160	1000	121.1	0.95	0.9		871.5	784.3	0.0	0.0	N				Y	24-SR2	Existing breaker
3	Reagent	Reagent Prep	4160V x 480V TFM1			3	4160		0.0	0.95	0.9				0.8		N				Y	24-SR1	Existing breaker - Feeds LS-MCC1
4	Reagent	Reagent Prep	4160V x 480V TFM2			3	4160		0.0	0.95	0.9				0.8		N				Y	24-SR2	Existing breaker - Feeds LS-MCC2
5	Reagent	Reagent Prep	A Mill Recycle Pump	FVNR		3	480	25	34.0	0.95	0.9		28.2	25.4	0.8	22.6	N	2	50		Y	LS-MCC1	
6	Reagent	Reagent Prep	B Mill Recycle Pump	FVNR		3	480	25	34.0	0.95	0.9		28.2	25.4	0.8	22.6	N	2	50		Y	LS-MCC2	
7	Reagent	Reagent Prep	A Mill Product Tank Agitator	FVNR		3	480	15	21.0	0.95	0.9		17.4	15.7	0.8	14.0	N	2	40		Y	LS-MCC1	
8	Reagent	Reagent Prep	B Mill Product Tank Agitator	FVNR		3	480	15	21.0	0.95	0.9		17.4	15.7	0.8	14.0	N	2	40		Y	LS-MCC2	
9	Reagent	Reagent Prep	A1 Classifier Feed Pump	FVNR		3	480	50	65.0	0.95	0.9		54.0	48.6	0.8	43.2	N	3	150		Y	LS-MCC1	
10	Reagent	Reagent Prep	A2 Classifier Feed Pump	FVNR		3	480	50	65.0	0.95	0.9		54.0	48.6	0.0	0.0	N	3	150		Y	LS-MCC1	
11	Reagent	Reagent Prep	B1 Classifier Feed Pump	FVNR		3	480	50	65.0	0.95	0.9		54.0	48.6	0.0	0.0	N	3	150		Y	LS-MCC2	
12	Reagent	Reagent Prep	B2 Classifier Feed Pump	FVNR		3	480	50	65.0	0.95	0.9		54.0	48.6	0.0	0.0	N	3	150		Y	LS-MCC2	
13	Reagent	Reagent Prep	VTM-1 Lube System	FDR		3	480	3	4.8	0.95	0.9		4.0	3.6	1.0	4.0	N		15		Y	LS-MCC1	
14	Reagent	Reagent Prep	VTM-2 Lube System	FDR		3	480	3	4.8	0.95	0.9		4.0	3.6	0.0	0.0	N		15		Y	LS-MCC1	
15	Reagent	Reagent Prep	Pre-Crusher 1	FVNR		3	480	200	240.0	0.95	0.9		199.3	179.4	0.8	159.4	N	5	350		Y	LS-MCC1	
16	Reagent	Reagent Prep	Pre-Crusher 2	FVNR		3	480	200	240.0	0.95	0.9		199.3	179.4	0.0	0.0	N	5	350		Y	LS-MCC2	
17	Reagent	FGD Additive	FGD Additive Tank Heater	FDR		3	480	10	14.0	0.95	0.9		11.6	10.5	1.0	11.6	N		30		Y	LS-MCC1	7kW heater
18	Reagent	FGD Additive	FGD Additive Feed Pump 1	FDR		3	480	1	2.1	0.95	0.9		1.7	1.6	0.8	1.4	N		15		Y	LS-MCC1	Skid control panel
19	Reagent	FGD Additive	FGD Additive Feed Pump 2	FDR		3	480	1	2.1	0.95	0.9		1.7	1.6	0.0	0.0	N		15		Y	LS-MCC1	Skid control panel
20	Reagent	Reagent Prep	Reagent Prep Lighting TFM1	FDR		3	480	100	124.0	0.95	0.9		103.0	92.7	0.7	72.1	N		200		N	LS-MCC1	
21	Reagent	Reagent Prep	Reagent Prep Convenience Power	FDR		3	480	100	124.0	0.95	0.9		103.0	92.7	0.5	51.5	N		200		N	LS-MCC2	
22	Reagent	Reagent Prep	Bridge Crane	FDR		3	480	20	27.0	0.95	0.9		22.4	20.2	0.5	11.2	N		50		N	LS-MCC2	
23	Reagent	Reagent Prep	Hydroclone Hoist	FDR		3	480	7.5	11.0	0.95	0.9		9.1	8.2	0.5	4.6	N		20		N	LS-MCC2	
24	Reagent	Reagent Prep	Ball Charge Hoist	FDR		3	480	7.5	11.0	0.95	0.9		9.1	8.2	0.7	6.4	N		20		N	LS-MCC1	
25	Reagent	Reagent Prep	Misc VTM Auxiliaries 1	FDR		3	480	10	14.0	0.95	0.9		11.6	10.5	1.0	11.6	N		30		N	LS-MCC1	
26	Reagent	Reagent Prep	Misc VTM Auxiliaries 2	FDR		3	480	10	14.0	0.95	0.9		11.6	10.5	0.3	2.9	N		30		N	LS-MCC2	
27	Reagent	Matl. Handling	Day Bin MOV1	ACT		3	480	3	4.8	0.95	0.9		4.0	3.6	1.0	4.0	N		15		Y	LS-MCC1	
28	Reagent	Matl. Handling	Day Bin MOV2	ACT		3	480	3	4.8	0.95	0.9		4.0	3.6	0.0	0.0	N		15		Y	LS-MCC1	
29	Reagent	Matl. Handling	Day Bin MOV3	ACT		3	480	3	4.8	0.95	0.9		4.0	3.6	0.0	0.0	N		15		Y	LS-MCC2	
30	Reagent	Matl. Handling	Day Bin MOV4	ACT		3	480	3	4.8	0.95	0.9		4.0	3.6	0.0	0.0	N		15		Y	LS-MCC2	
31	Reagent	Matl. Handling	Weigh Belt Feeder 1	FDR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.8	2.0	N		15		Y	LS-MCC1	
32	Reagent	Matl. Handling	Weigh Belt Feeder 2	FDR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.0	0.0	N		15		Y	LS-MCC1	
33	Reagent	Matl. Handling	Weigh Belt Feeder 3	FDR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.0	0.0	N		15		Y	LS-MCC2	
34	Reagent	Matl. Handling	Weigh Belt Feeder 4	FDR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.0	0.0	N		15		Y	LS-MCC2	
35	Reagent	Matl. Handling	Transfer Conveyor 1	FVNR		3	480	15	21.0	0.95	0.9		17.4	15.7	0.8	14.0	N	2	40		Y	LS-MCC1	
36	Reagent	Matl. Handling	Transfer Conveyor 2	FVNR		3	480	15	21.0	0.95	0.9		17.4	15.7	0.0	0.0	N	2	40		Y	LS-MCC2	
37	Reagent	FGD Additive	Heat Tracing	FDR		1	208			0.95	0.9				0.8		N				N		Use existing spares
38	Reagent	Reagent Prep	Limestone Slurry Tank Agitator	FVNR		3	480	20	27.0	0.95	0.9		22.4	20.2	0.8	17.9	N	2	50		Y	2SR2-3 (B2)	Replacing 10HP agitator
39	Dewater	Thickener	TUF Sludge Tank Agitator	FVNR		3	480	75	96.0	0.95	0.9		79.7	71.7	0.8	63.8	N	4	200		Y	Existing MCC	Replacing 15HP agitator
40	Dewater	Filter Feed	WSP Surge Tank Agitator	FVNR		3	480	60	77.0	0.95	0.9		63.9	57.5	0.8	51.2	N	4	200		Y	Existing MCC	Replacing 10HP agitator
24	Reagent	Reagent Prep	Limestone Slurry Tank Agitator - GB Heater	FDR		3	480	5	7.6	0.95	0.9		6.3	5.7	0.7	4.4	N		15		Y	Existing MCC	Reuse existing cabling and breaker
25	Dewater	Thickener	Sludge Tank Agitator - GB Heater	FDR		3	480	5	7.6	0.95	0.9		6.3	5.7	0.7	4.4	N		15		Y	Existing MCC	Reuse existing cabling and breaker
26	Dewater	Filter Feed	WSP Surge Tank Agitator - GB Heater	FDR		3	480	5	7.6	0.95	0.9		6.3	5.7	0.7	4.4	N		15		Y	Existing MCC	Reuse existing cabling and breaker
27	Reagent	Reagent Prep	Limestone Slurry Tank Agitator - Lube Pump	FVNR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.8	2.0	N	0	15		Y	Existing MCC	Reuse existing cabling and starter
28	Dewater	Thickener	Sludge Tank Agitator - Lube Pump	FVNR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.8	2.0	N	0	15		Y	Existing MCC	Reuse existing cabling and starter
29	Dewater	Filter Feed	WSP Surge Tank Agitator - Lube Pump	FVNR		3	480	1.5	3.0	0.95	0.9		2.5	2.2	0.8	2.0	N	0	15		Y	Existing MCC	Reuse existing cabling and starter
30	Reagent	Reagent Prep	PDC Auxiliaries	FDR		3	480	25	34.0	0.95	0.9		28.2	25.4	0.7	19.8	N		50		N		Lighting, HVAC, etc...
31	Reagent	ME Wash	Service Water Pump 2-1	FVNR		3	480	250	302.0	0.95	0.9		250.8	225.7	0.8	200.6	N	6	400		Y	2SR1-4B	Upgrade existing 200 HP pump
32	Reagent	ME Wash	Service Water Pump 2-1	FVNR		3	480	250	302.0	0.95	0.9		250.8	225.7	0.0	0.0	N	6	400		Y	2SR2-3C	Upgrade existing 200 HP pump
33	Reagent	Reagent Prep	Sump Pump A	FVNR		3	480	10	14.0	0.95	0.9		11.6	10.5	0.5	5.8	N	1	30		Y	LS-MCC1	
34	Reagent	Reagent Prep	Sump Pump B	FVNR		3	480	10	14.0	0.95	0.9		11.6	10.5	0.0	0.0	N	1	30		Y	LS-MCC2	
35	Reagent	Reagent Prep	Sump Agitator	FVNR		3	480	5	7.6	0.95	0.9		6.3	5.7	0.8	5.0	N	1	15		Y	LS-MCC1	
			<b>TOTALS</b>					<b>3725.50</b>					<b>3554.40</b>	<b>3198.96</b>		<b>1553.43</b>							

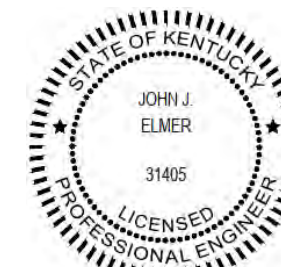
## Appendix E - One Line Diagrams



WIRING DIAG. REFERENCE	E2292 D1	E-2292-2	E-2292-3	E-2292-4	E2292 05	E-2292-6	E2292 07	E2292 08	E2292 09	E2292 10
SCHEMATIC REF. E2240 PAGE	BA10E-A & B	AB011-A & B	AB007-A & B		AB001-A & B	AB003-A & B	AB005-A & B	CR002-A & B	AP100-A & B	
KVA OR MOTOR RATING H.P.	350	450	450		450	450	450	1000		
BREAKER FRAME SIZE (AMPS)	1200	1200	1200	1200	1200	1200	1200	1200	2000	
SERVICE	SEAL AIR FAN 2-1	ABSORBER PUMP 2C-3	ABSORBER PUMP 2H-3	FAN	ABSORBER PUMP 2A-1	ABSORBER PUMP 2A-1	ABSORBER PUMP 2B-1	SPARE	4160V SWGR 245R-1 TIE TO SWGR 245R-2	CT'S & PT'S COMPARTMENT



WIRING DIAG. REFERENCE	E2292 11	E-2292 12	E2292 13	E-2292 14
SCHEMATIC REF. E2240 PAGE	AP099-A & B		AB009-A & B	
KVA OR MOTOR RATING H.P.	7.5/10 MVA		450	1000
BREAKER FRAME SIZE (AMPS)	2000	1200	1200	2000
SERVICE	FGDS AUX. TRANSF. 25R-1 INCOMING LINE	TRANSFORMER	ABSORBER PUMP 2C-1	MOTOR



John J. Elmer  
5/3/24

**PRELIMINARY**  
**FOR PERMITTING PURPOSES ONLY**

NOTE: TWO SPARE 4160V COMPARTMENTS WILL BE UTILIZED TO ENERGIZE EACH REAGENT HANDLING AND PREPARATION SYSTEM TWO COMPARTMENTS WILL BE UTILIZED FROM 245R-2 ONE OF THE COMPARTMENTS ON EACH EXISTING JINEP WILL BE UTILIZED TO POWER A 1000HP VFM MOTOR AND THE OTHER COMPARTMENT WILL FEED A 4160V X 400V TRANSFORMER THAT WILL SUPPLY THE REMAINING POWER DISTRIBUTION REQUIREMENTS IN THE REAGENT HANDLING AND PREPARATION AREAS IT IS ASSUMED THAT THE SPARE COMPARTMENTS ARE EQUIPPED WITH A 4160V BREAKER AND CONTROL WIRING EACH 4160V COMPARTMENT (TWO COMPARTMENTS TOTAL) WILL HAVE NEW SEL RELAYS INSTALLED (FEEDER PROTECTION OR MOTOR PROTECTION AS REQUIRED)

20 B1

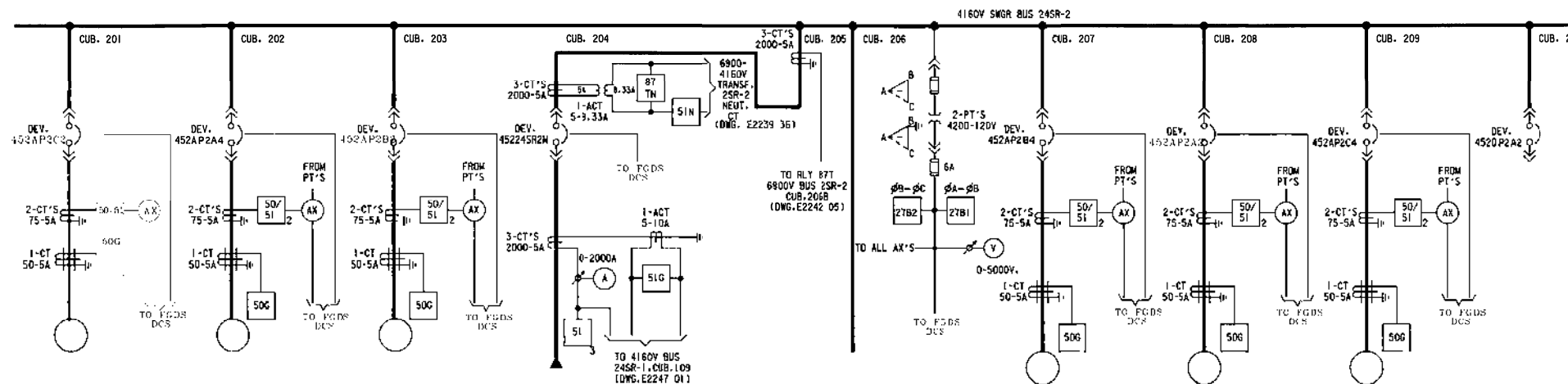
KEY DIAGRAM E 2247 1

REV	DATE	JOB NO.	PROJECT TYPE	DES	DFTR	CHKD	ENGR	APFD	DESCRIPTION
2	12-21-12	EB201348AB-E	AS-BUILT	MSA	GUV	DLM	DRC	DRC	FGD CONTROLS REPLACEMENT
3	9-10-13	EBS01343AB-E	AS-BUILT	DLM	DLM	DLM	DRC	DRC	REPLACE ABS PUMP BREAKER PH1
4A	3-1-24	60724995	PERMIT APP.	WW			DA		PERMIT APPLICATION

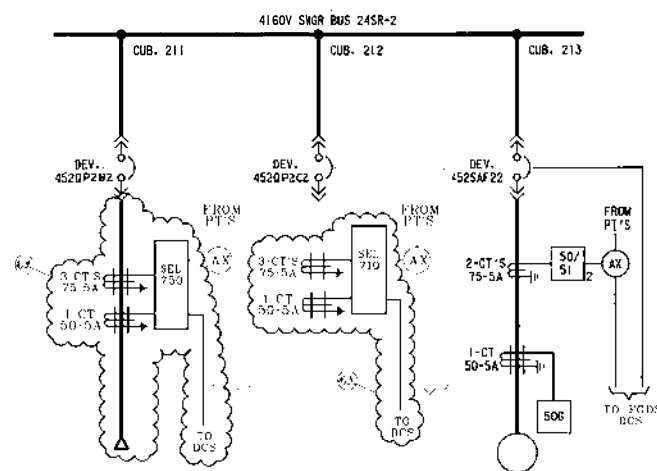
**DUKE ENERGY**

SCALE: NONE DES: TITLE SINGLE LINE DIAGRAM  
 DWG TYPE: WL DFTR: 4160V AUX 245R-1 SWITCHGEAR  
 JOB NO: CHKD: FOR EAST BEND STATION - UNIT 2  
 DATE: ENGR: DWG SIZE DRAWING NO. REVISION  
 APPD: ANSIB 11"x17" SLD20B1 4A

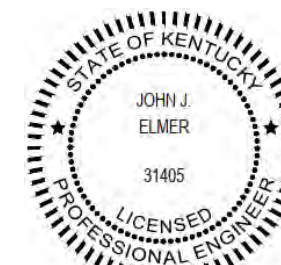
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WIRING DIAG. REFERENCE	E-2293-1	E2293-02	E-2293-3	E2293-04	E2293-05	E2293-06	E2293-07	E-2293-8	E2293-09	E-2293-10
SCHEMATIC REF. E2240 PAGE	AB010-A & B	AB004-A & B	AB006-A & B	AP099-A & B			AB008-A & B	AB002-A & B	AB012-A & B	
KVA OR MOTOR RATING H.P.	450	450	450	7.5/10MVA			450	450	450	
BREAKER FRAME SIZE (AMPS)	1200	1200	1200	2000			1200	1200	1200	1200
SERVICE	ABSORBER PUMP 2C-2	ABSORBER PUMP 2A-4	ABSORBER PUMP 2B-2	FGDS AUX. TRANSF. 2SR-2 INCOMING LINE	AUX. COMPARTMENT	4160V SWGR. 24SR-1 TIE TO SWGR. 24SR-2 & PT COMPT.	ABSORBER PUMP 2B-4	ABSORBER PUMP 2A-2	ABSORBER PUMP 2C-4	SPARE



WIRING DIAG. REFERENCE	E-2293-11	E-2293-12	E2293-13
SCHEMATIC REF. E2240 PAGE			BA106-A & B
KVA OR MOTOR RATING H.P.			350
BREAKER FRAME SIZE (AMPS)	1200	1200	1200
SERVICE	TRANSFORMER	MOTOR	SEAL AIR FAN 2-2



*John J. Elmer*  
5/3/24

**PRELIMINARY**  
**FOR PERMITTING PURPOSES ONLY**

NOTE: TWO SPARE 4160V COMPARTMENTS WILL BE UTILIZED TO ENERGIZE EACH REAGENT HANDLING AND PREPARATION SYSTEM TAG COMPARTMENTS WILL BE UTILIZED FROM 24SR-1 AND TWO SPARE COMPARTMENTS WILL BE UTILIZED FROM 24SR-2 ONE OF THE COMPARTMENTS ON EACH EXISTING LINCUP WILL BE UTILIZED TO POWER A 1000HP VTM MOTOR AND THE OTHER COMPARTMENT WILL FEED A 4160V X 480V TRANSFORMER THAT WILL SUPPLY THE REMAINING POWER DISTRIBUTION REQUIREMENTS IN THE REAGENT HANDLING AND PREPARATION AREAS IT IS ASSUMED THAT THE SPARE COMPARTMENTS ARE EQUIPPED WITH A 4160V BREAKER AND CONTROL WIRING. EACH 4160V COMPARTMENT FOUR COMPARTMENTS TOTAL WILL HAVE NEW SEL RELAYS INSTALLED FEEDER PROTECTION OR MOTOR PROTECTION AS REQUIRED.

20 B2

KEY DIAGRAM: E-2247-2

REV	DATE	JOB NO.	PROJECT TYPE	DES	DFTR	CHKD	ENGR	APFD	DESCRIPTION	SCALE:	DES:	TITLE
2	12-21-12	EB201348AB-E	AS-BUILT	MSA	GUV	DLM	DRC	DRC	FGD CONTROLS REPLACEMENT	NONE		SINGLE LINE DIAGRAM
									REVISED BY A&A	DWG TYPE: WL	DFTR:	4160V AUX 24SR-2 SWITCHGEAR
3	9-10-13	EBS01343AB-E	AS-BUILT	DLM	DLM	DLM	DRC	DRC	REPLACE ABS PUMP BREAKER PH1	JOB NO:	CHKD:	FOR EAST BEND STATION - UNIT 2
4A	3-1-24	60724995	PERMIT APP.	WW			DA	DA	PERMIT APPLICATION	DATE:	ENGR:	DWG SIZE
										APPD:		DRAWING NO.
												ANSI B 11"x17"
												SLD20B2
												REVISION
												4A



FILENAME: ebs\_02\_cge\_slid20b2.dgn



**PROJECT**  
 Duke Energy  
 East Bend  
 Limestone Conversion  
 East Bend

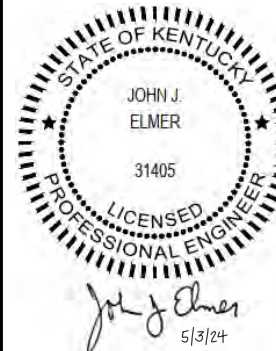
**CLIENT**  
 Duke Energy

**CONSULTANT**  
 AECOM Process Technologies  
 13640 Briarwick Dr  
 Austin, TX 78729  
 512.454.4737 ext 512.419.6004 fax  
 www.aecom.com

**PRELIMINARY**

**ISSUE FOR INFORMATION**

**REGISTRATION**



**ISSUE/REVISION**

IR	DATE	DESCRIPTION
A	2022-08-02	Issue for Information

**KEY PLAN**

**PROJECT NUMBER**

60680586

**SHEET TITLE**

Electrical Building  
 LS-MCC1  
 One-Line Diagram

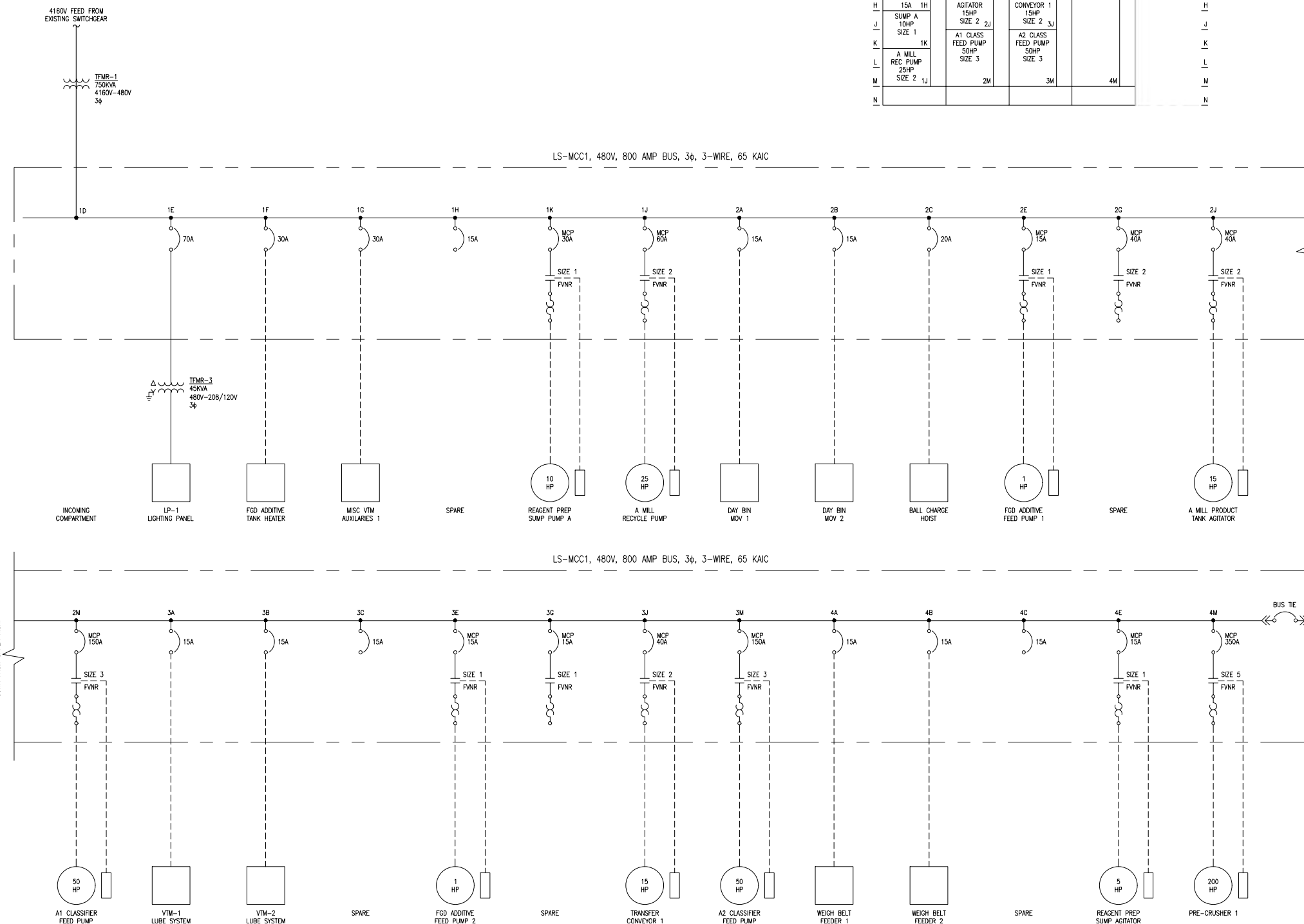
**SHEET NUMBER**

SK-E-100

1		2		3		4		5	
A	INCOMING COMPARTMENT	DAY BIN MOV 1 15A 2A	VTM-1 15A 3A	WEIGH BF-1 15A 4A					
B		DAY BIN MOV 2 15A 2B	VTM-2 15A 3B	WEIGH BF-2 15A 4B					
C		BALL HOIST 20A 2C	SPARE 15A 3C	SPARE 30A 4C	FUTURE				
D		FGD ADD FEED PUMP 1 1HP SIZE 1 2E	FGD ADD FEED PUMP 2 1HP SIZE 1 3E	SUMP AGITATOR SHP SIZE 1 4E					
E	LP-1 70A 1E								
F	FGD TNK HTR 30A 1F	SPARE 15HP SIZE 2 2G	SPARE 1HP SIZE 1 3G	REAGENT PRE-CRUSHER 1 200HP SIZE 5					
G	VTM AUX 1 30A 1G								
H	SPARE 15A 1H	A MILL TANK AGITATOR 15HP SIZE 2 2J	TRANSFER CONVEYOR 1 15HP SIZE 2 3J						
J	SUMP A 10HP SIZE 1 1K	A1 CLASS FEED PUMP 50HP SIZE 3 2M	A2 CLASS FEED PUMP 50HP SIZE 3 3M						
K	A MILL REC. PUMP 25HP SIZE 2 1J								
L									
M									
N									

**NOTES:**  
 1. ALL WORK SHALL BE INSTALLED IN ACCORDANCE WITH PROJECT STANDARDS AND THE LATEST EDITION OF THE NATIONAL ELECTRICAL CODE.

Project Management Initials: Designer: \_\_\_\_\_ Approved: \_\_\_\_\_ SFB ARCH D 24" x 36"  
 Checked: \_\_\_\_\_ SFB



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**PROJECT**  
 Duke Energy  
 East Bend  
 Limestone Conversion  
 East Bend

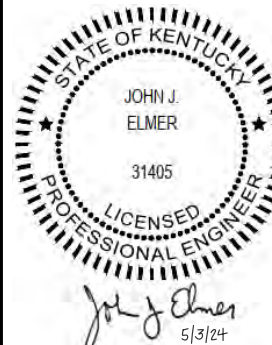
**CLIENT**  
 Duke Energy

**CONSULTANT**  
 AECOM Process Technologies  
 9400 Amberglen Boulevard  
 Austin, Tx 78729  
 512.454.4797 tel 512.419.6004 fax  
 www.aecom.com

**PRELIMINARY**

**ISSUE FOR INFORMATION**

**REGISTRATION**



**ISSUE/REVISION**

IR	DATE	DESCRIPTION
A	2022-08-02	Issue for Information

**KEY PLAN**

**PROJECT NUMBER**

60680586

**SHEET TITLE**

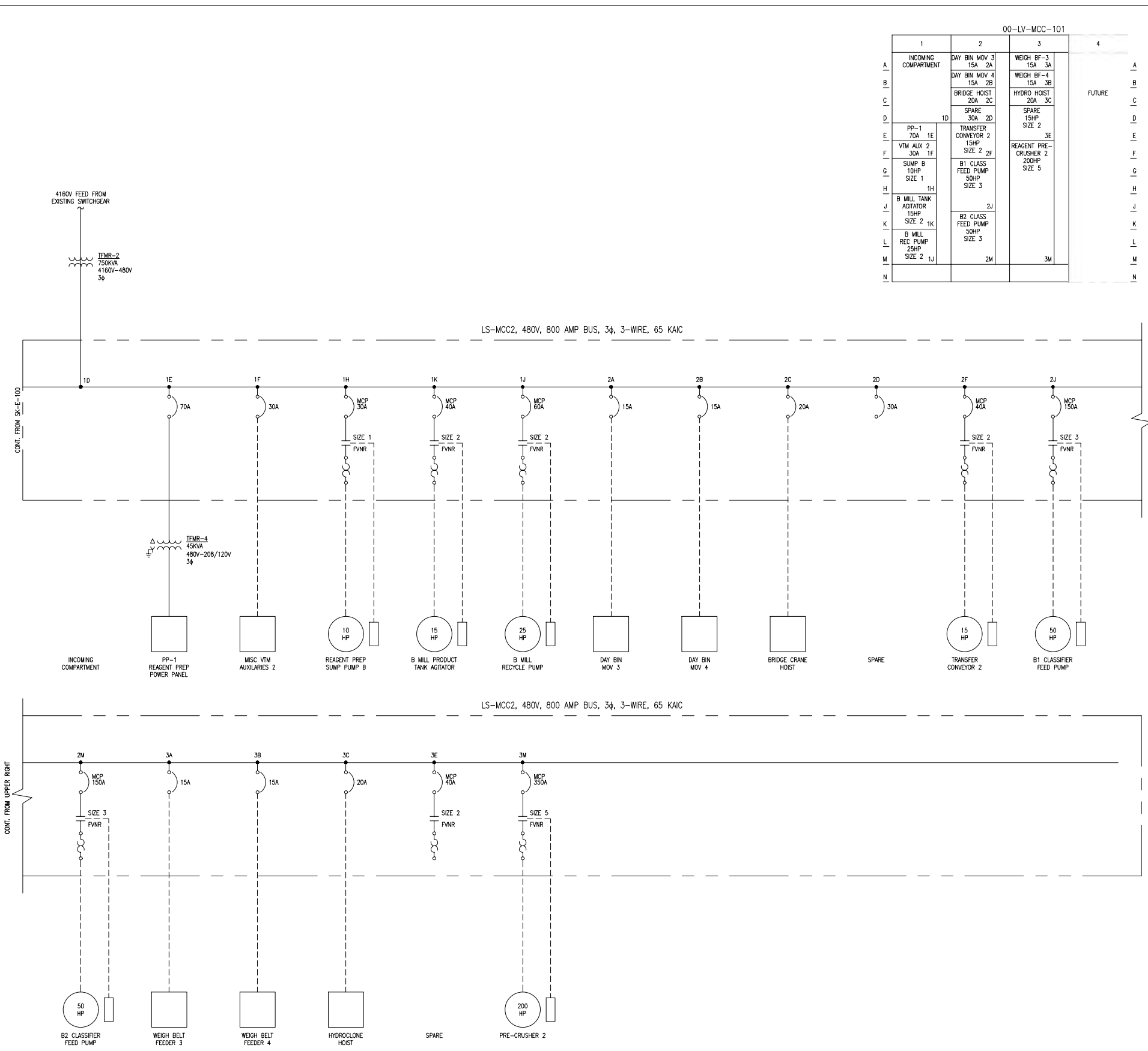
Electrical Building  
 LS-MCC2  
 One-Line Diagram

**SHEET NUMBER**

SK-E-101

**NOTES:**  
 1. ALL WORK SHALL BE INSTALLED IN ACCORDANCE WITH PROJECT STANDARDS AND THE LATEST EDITION OF THE NATIONAL ELECTRICAL CODE.

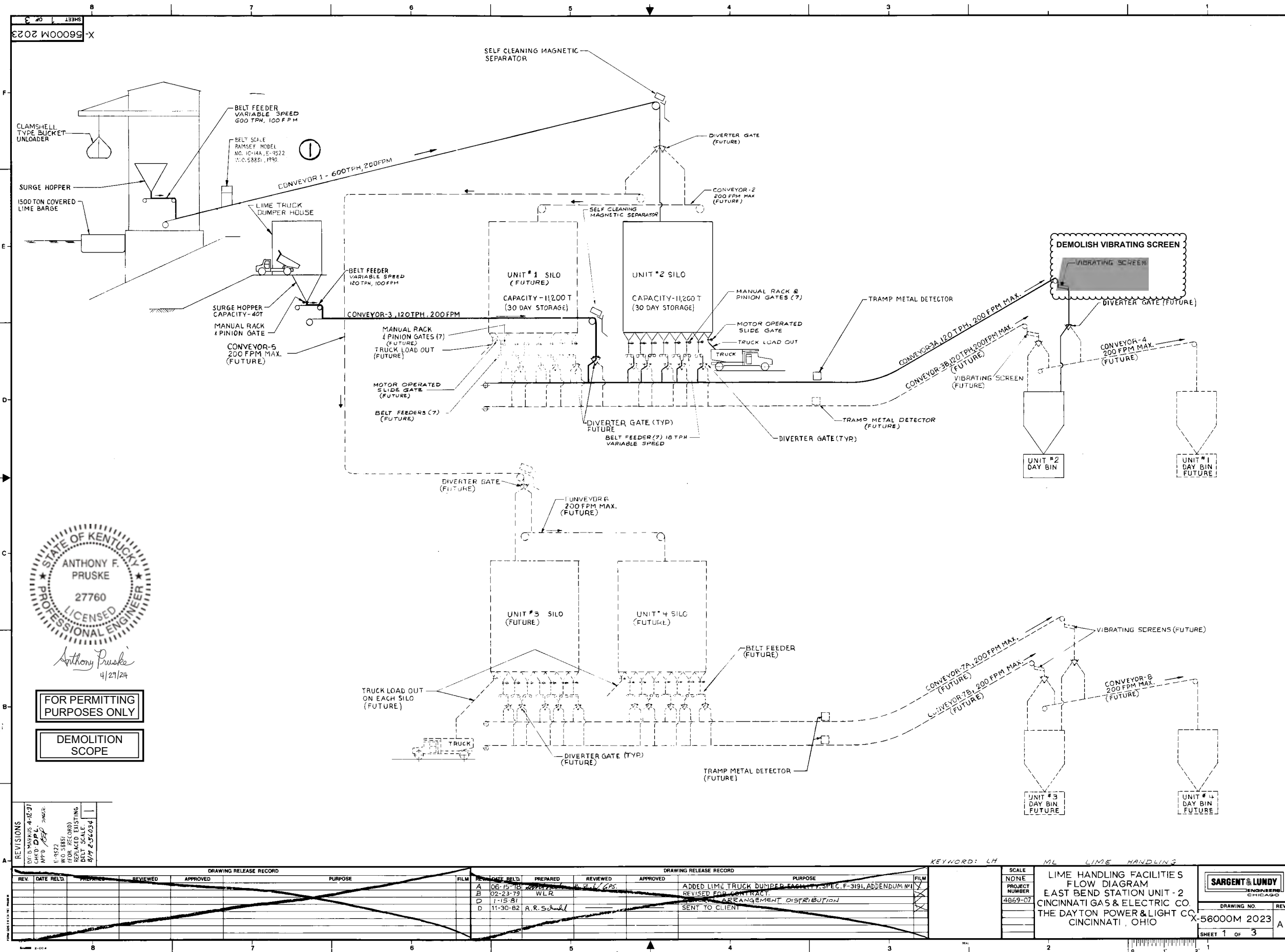
00-LV-MCC-101			
1	2	3	4
A INCOMING COMPARTMENT	DAY BIN MOV 3 15A 2A	WEIGH BF-3 15A 3A	A
B	DAY BIN MOV 4 15A 2B	WEIGH BF-4 15A 3B	B
C	BRIDGE HOIST 20A 2C	HYDRO HOIST 20A 3C	C
D	SPARE 30A 2D	SPARE 15HP SIZE 2	D
E	PP-1 70A 1E	TRANSFER CONVEYOR 2 15HP SIZE 2 2F	E
F	MISC VIM 30A 1F	REAGENT PRE-CRUSHER 2 200HP SIZE 5	F
G	SUMP B 10HP SIZE 1	B1 CLASS FEED PUMP 50HP SIZE 3	G
H	B MILL TANK AGITATOR 15HP SIZE 2 1K	B2 CLASS FEED PUMP 50HP SIZE 3	H
J	B MILL REC PUMP 25HP SIZE 2 1J		J
K			K
L			L
M			M
N			N



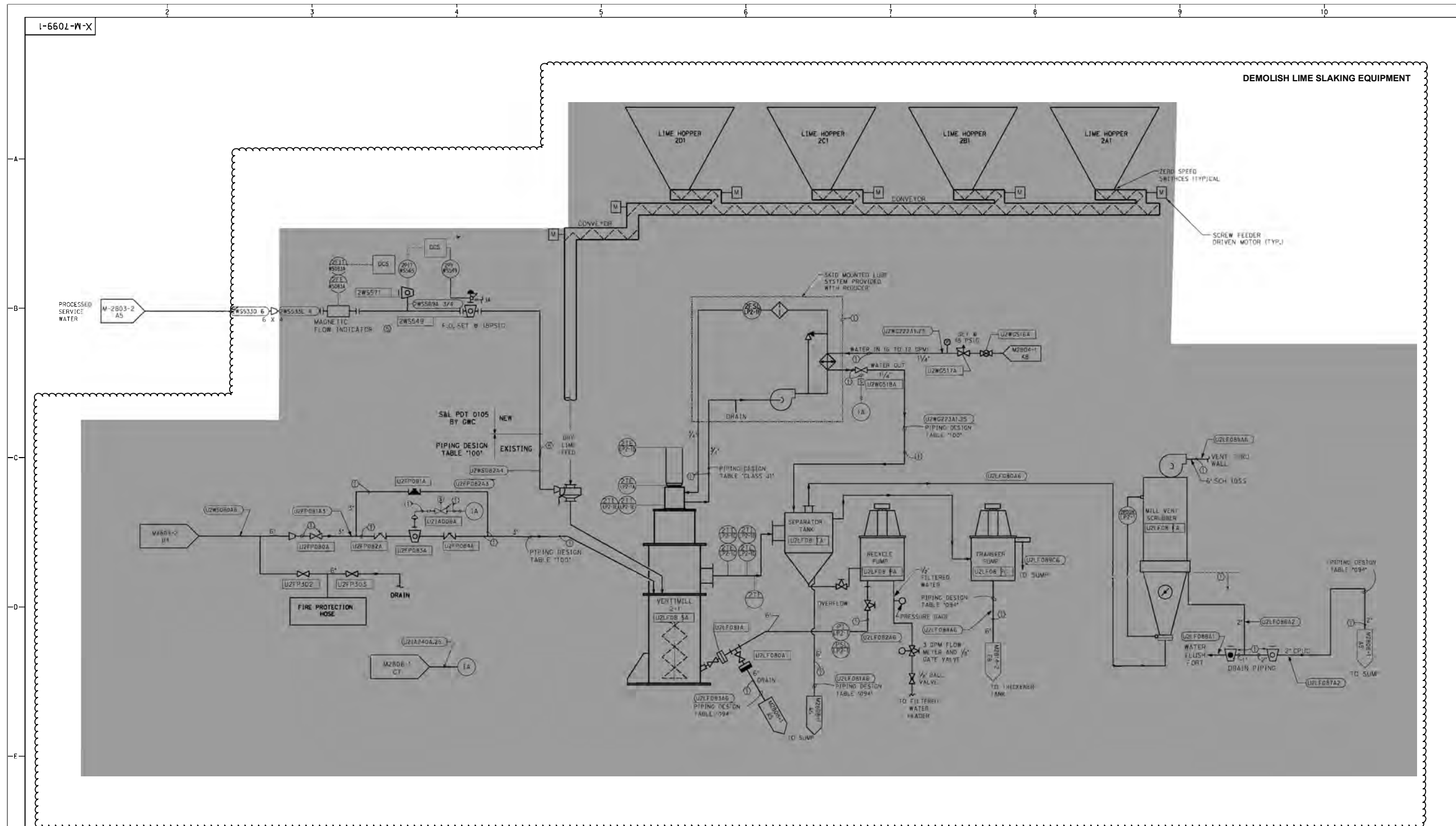
Project Management Initials: Designer: \_\_\_\_\_ Approved: \_\_\_\_\_ SFB ARCH D 24' x 30'

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## Appendix F - Demolition Drawings







FOR PERMITTING  
PURPOSES ONLY

DEMOLITION  
SCOPE



*Anthony Pruske*  
4/21/24

**NOTES**

1. REFERENCE CG&E DWG. M-2152 SHEET 2 FOR SYMBOLOLOGY.
2. ALL WORK SHOWN IF FURNISHED BY PURCHASER AND INSTALLED BY INSTALLATION CONTRACTOR UNLESS NOTED OTHERWISE.
3. ① FURNISHED AND INSTALLED BY INSTALLATION CONTRACTOR.  
② EXISTING EQUIPMENT
4. ALL REDUCERS FURNISHED AND INSTALLED BY INSTALLATION CONTRACTOR.
5. IN PLACE, DISCONNECT/RECONNECT
6. DEMOLITION INDICATED TYPICAL FOR TWO SYSTEMS

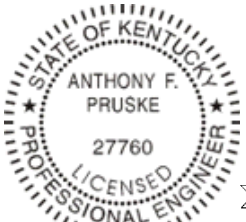
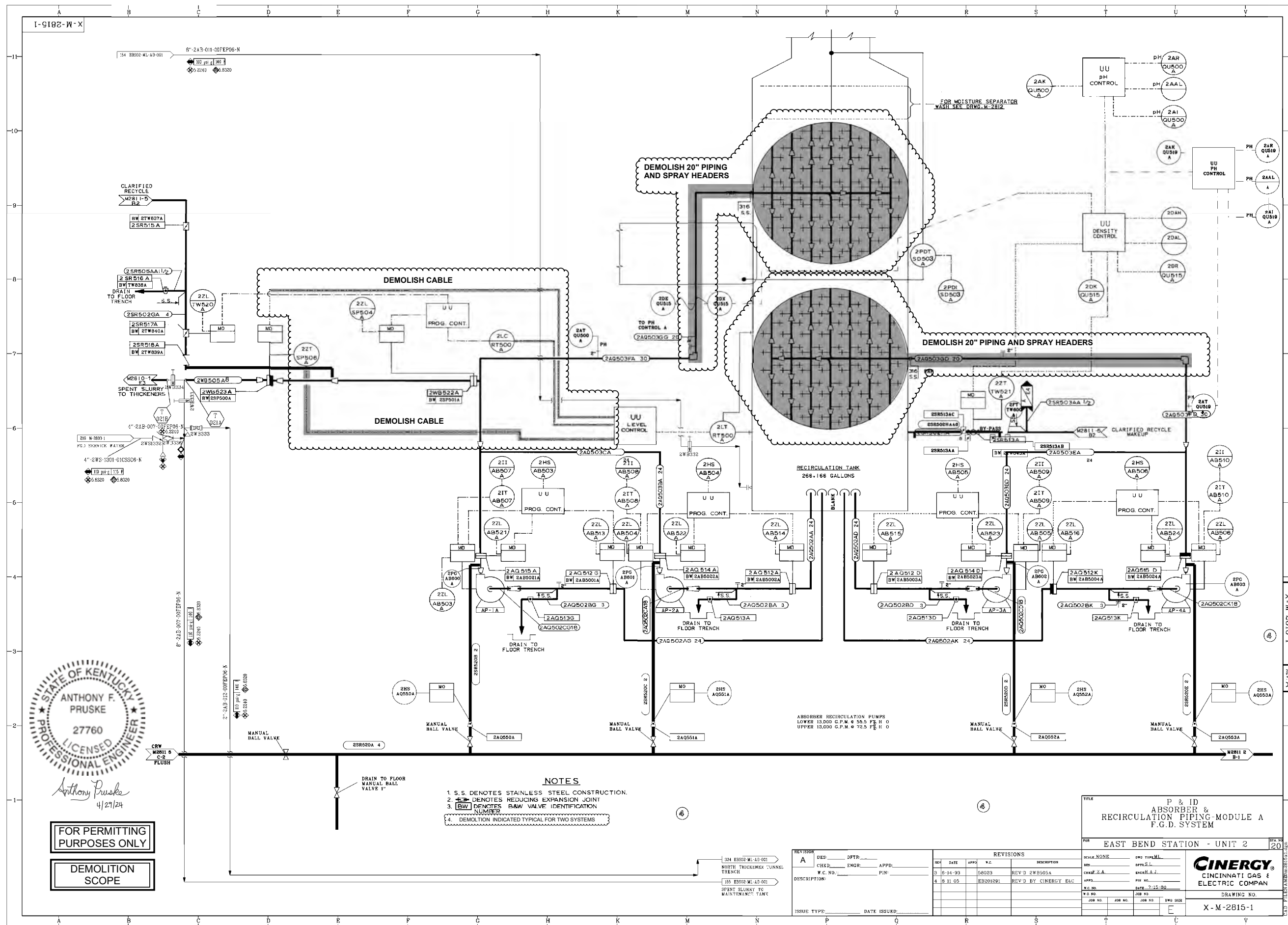
**REFERENCES**

- M-2803 SERVICE WATER (P & ID)
- M-2806-1 INSTRUMENT AIR (P & ID)
- M-2808 1 DRAINS & VENTS FGD SYS (P & ID)
- M-2809-2 FIRE PROTECTION (P & ID)
- M-2810 1 THICKENER UNDERFLOW FGD SYS (P & ID)
- M-2811-5 CLARIFIED RECYCLE (P & ID)
- M-2812 WASH SERVICE WATER (P & ID)
- M-28 4-1 LIME SLURRY FEED SYSTEM (P & ID)
- M-2814-2 SLURRY FEED RECIRC. PIPING (P & ID)
- M-7057 GR.T REMOVAL SYSTEM (P & ID)
- M-7056 VERTIMILL LIME SLAKER (PLAN)
- M-7057 VERTIMILL LIME SLAKER (LOWER PLAN)
- M-7100 VERTIMILL LIME SLAKER (SECT)
- M-7099-2 VERTIMILL LIME SLAKER (P & ID)

REVISION A DCS --- DFTB --- CHG. ENGR. APPR. W.C. NO. PIN DESCRIPTION:		TITLE <b>P&amp;ID VERTIMILL LIME SLAKER PART 1</b>	
ISSUE TYPE: _____ DATE ISSUED: _____		FOR EAST BEND STATION - UNIT 2	
<b>REVISIONS</b> REV. DATE APPR. W.C. DESCRIPTION 1 06/25/01 DB EBS98PE VERTIMILL ADDITIONS AND SLAKER REMOVAL 2 12/10/04 GC EB251 REPLACED SEP. TANK RELOCATED REC. PUMPS 3 4/7/2021 TAW F3020740 REPLACED FLOW CONTROL VALVE STATION		SCALE: NONE DWG. TYPE: J.E. DESIGNED BY: EBS111 CHECKED BY: EBS111 DRAWN BY: EBS111 PROJECT NO.: 58329 DATE: 2-28-95 E-5784 <b>CINERGY</b> CINCINNATI GAS & ELECTRIC COMPANY DRAWING NO.: <b>X-M-7099-1</b>	







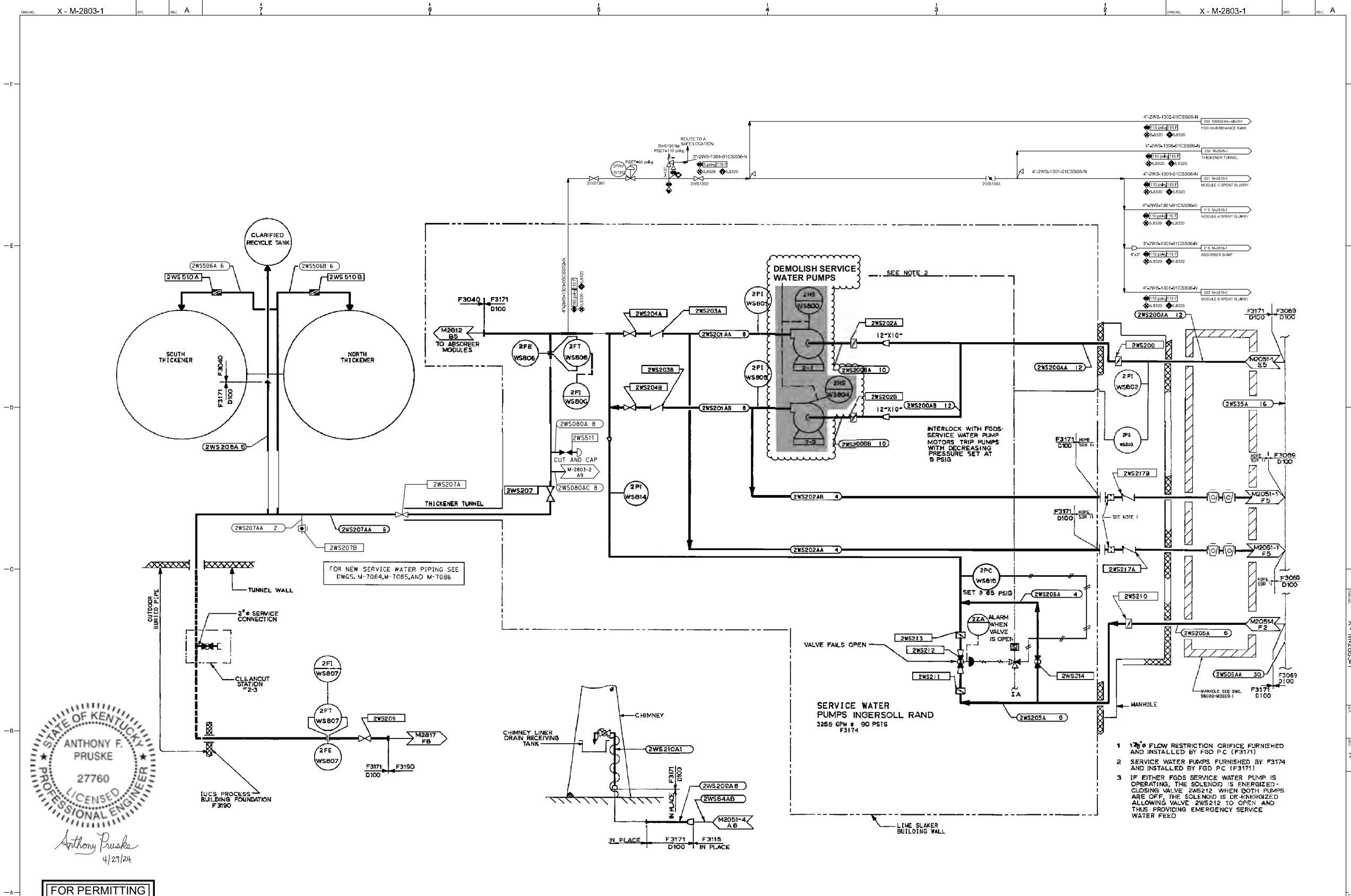
*Anthony Pruske*  
4/27/24

FOR PERMITTING PURPOSES ONLY  
DEMOLITION SCOPE

- NOTES**
1. S.S. DENOTES STAINLESS STEEL CONSTRUCTION.
  2. DENOTES REDUCING EXPANSION JOINT
  3. DENOTES BALL VALVE IDENTIFICATION NUMBER
  4. DEMOLITION INDICATED TYPICAL FOR TWO SYSTEMS

154 E8802 WL AD 001  
NORTH THICKENER TUNNEL TRENCH  
155 E8802 WL AD 001  
SPENT SLURRY TO MAINTENANCE TANK

<b>REVISION</b> A DES: DPTR: _____ CHKD: ENGR: _____ W.C. NO.: _____ PIN: _____ DESCRIPTION: _____		<b>REVISIONS</b> <table border="1"> <thead> <tr> <th>REV</th> <th>DATE</th> <th>APPD</th> <th>W.C.</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>8-14-93</td> <td>58023</td> <td></td> <td>REV'D 2WB505A</td> </tr> <tr> <td>4</td> <td>8-11-05</td> <td>E8801291</td> <td></td> <td>REV'D BY CINERGY EAC</td> </tr> </tbody> </table>		REV	DATE	APPD	W.C.	DESCRIPTION	3	8-14-93	58023		REV'D 2WB505A	4	8-11-05	E8801291		REV'D BY CINERGY EAC	SCALE: NONE DES: _____ CHECKED: Z.A. APPD: _____ W.C. NO.: _____ DATE: 7-15-20 JOB NO.: _____ JOB NO.: _____ JOB NO.: _____ DWG SIZE: _____		<b>TITLE</b> P & ID ABSORBER & RECIRCULATION PIPING-MODULE A F.G.D. SYSTEM <b>FOR</b> EAST BEND STATION - UNIT 2 SHEET NO. 20	<b>CINERGY</b> CINCINNATI GAS & ELECTRIC COMPAN DRAWING NO. X-M-2815-1
REV	DATE	APPD	W.C.	DESCRIPTION																		
3	8-14-93	58023		REV'D 2WB505A																		
4	8-11-05	E8801291		REV'D BY CINERGY EAC																		



*Anthony Pruske*  
4/29/24

FOR PERMITTING PURPOSES ONLY  
DEMOLITION SCOPE

NO.	DESCRIPTION	DATE	BY	CHKD	APP'D
13	VERTICAL HEAT EXCHANGER	4/7/2021	TAW	TAW	EB020740
12	DWG REVISIONS - SUMMER 2020 (LOTO)	11/05/20	MAG	BDS	N/A
11	CONFORMING TO CONST. REC.	10-23-19	MAG	DKN	EB020740

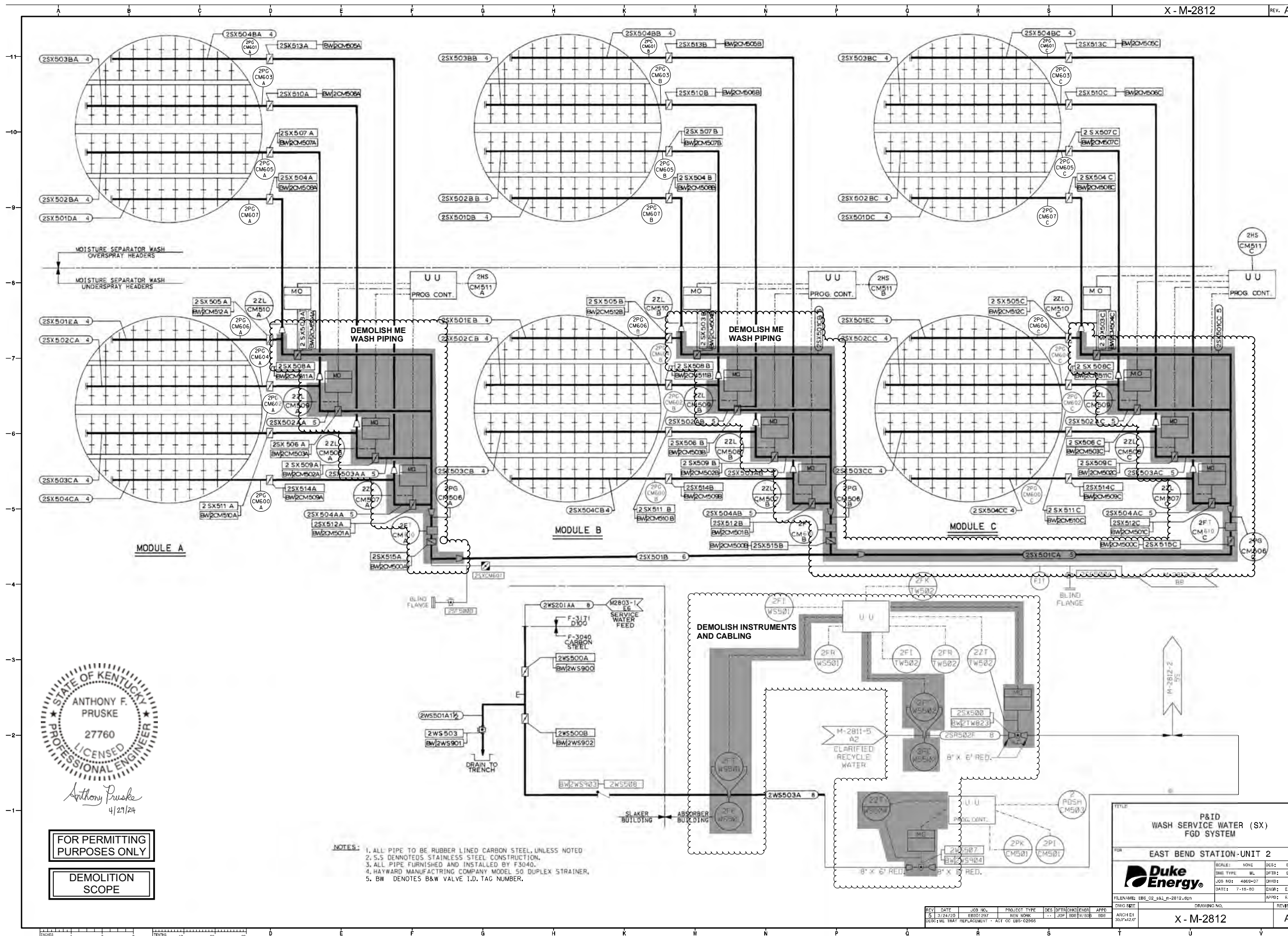
EAST BEND STATION - UNIT 2			
FOSSIL HYDRO OPERATIONS			
DATE:	02	REVISED:	11/11/20
PROJECT:	4869-07	WCS:	WCS
SCALE:	NONE	SIZE:	42" X 30"
		DATE:	5-30-79

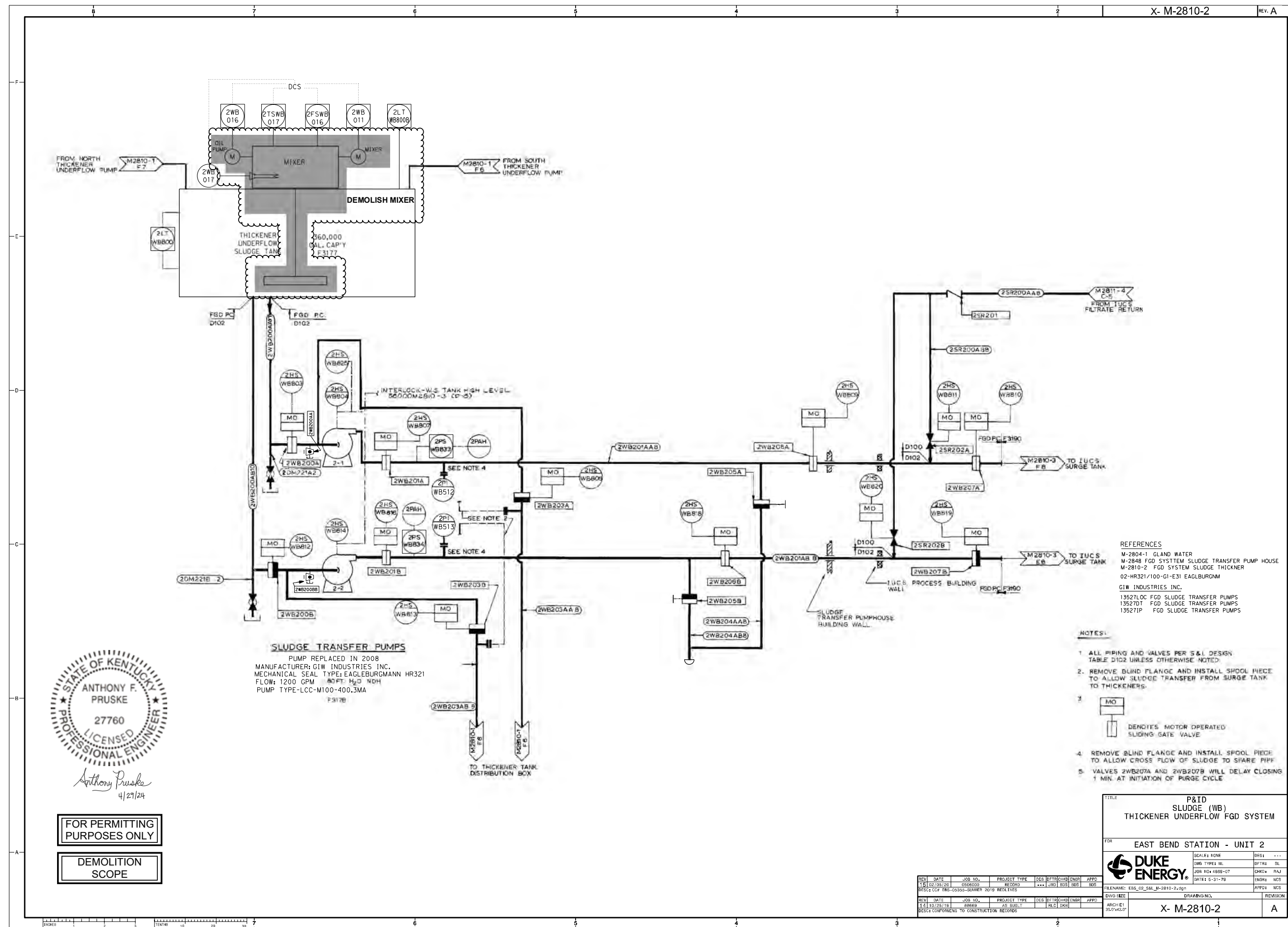


P & ID  
FGD SYSTEM  
SERVICE WATER  
(WS)

X - M-2803-1








STATE OF KENTUCKY  
 ANTHONY F. PRUSKE  
 27760  
 LICENSED PROFESSIONAL ENGINEER  
 Anthony Pruske  
 4/27/24

FOR PERMITTING PURPOSES ONLY  
 DEMOLITION SCOPE

**SLUDGE TRANSFER PUMPS**  
 PUMP REPLACED IN 2008  
 MANUFACTURER: GIW INDUSTRIES INC.  
 MECHANICAL SEAL TYPE: EAGLEBURGMANN HR321  
 FLOW: 1200 GPM 80 FT. H<sub>2</sub>O NDH  
 PUMP TYPE-LCC-M100-400.3MA  
 F317B

**REFERENCES**  
 M-2804-1 GLAND WATER  
 M-2848 FGD SYSTEM SLUDGE TRANSFER PUMP HOUSE  
 M-2810-2 FGD SYSTEM SLUDGE THICKNER  
 02-HR321/100-G1-E31 EAGLEBURGMANN  
 GIW INDUSTRIES INC.  
 135270C FGD SLUDGE TRANSFER PUMPS  
 135270T FGD SLUDGE TRANSFER PUMPS  
 135271P FGD SLUDGE TRANSFER PUMPS

- NOTES:**
1. ALL PIPING AND VALVES PER S&I DESIGN TABLE D102 UNLESS OTHERWISE NOTED.
  2. REMOVE BLIND FLANGE AND INSTALL SPOOL PIECE TO ALLOW SLUDGE TRANSFER FROM SURGE TANK TO THICKENERS.
  3.  DENOTES MOTOR OPERATED SLIDING GATE VALVE
  4. REMOVE BLIND FLANGE AND INSTALL SPOOL PIECE TO ALLOW CROSS FLOW OF SLUDGE TO SHARE PIPE
  5. VALVES 2WB207A AND 2WB207B WILL DELAY CLOSING 1 MIN. AT INITIATION OF PURGE CYCLE

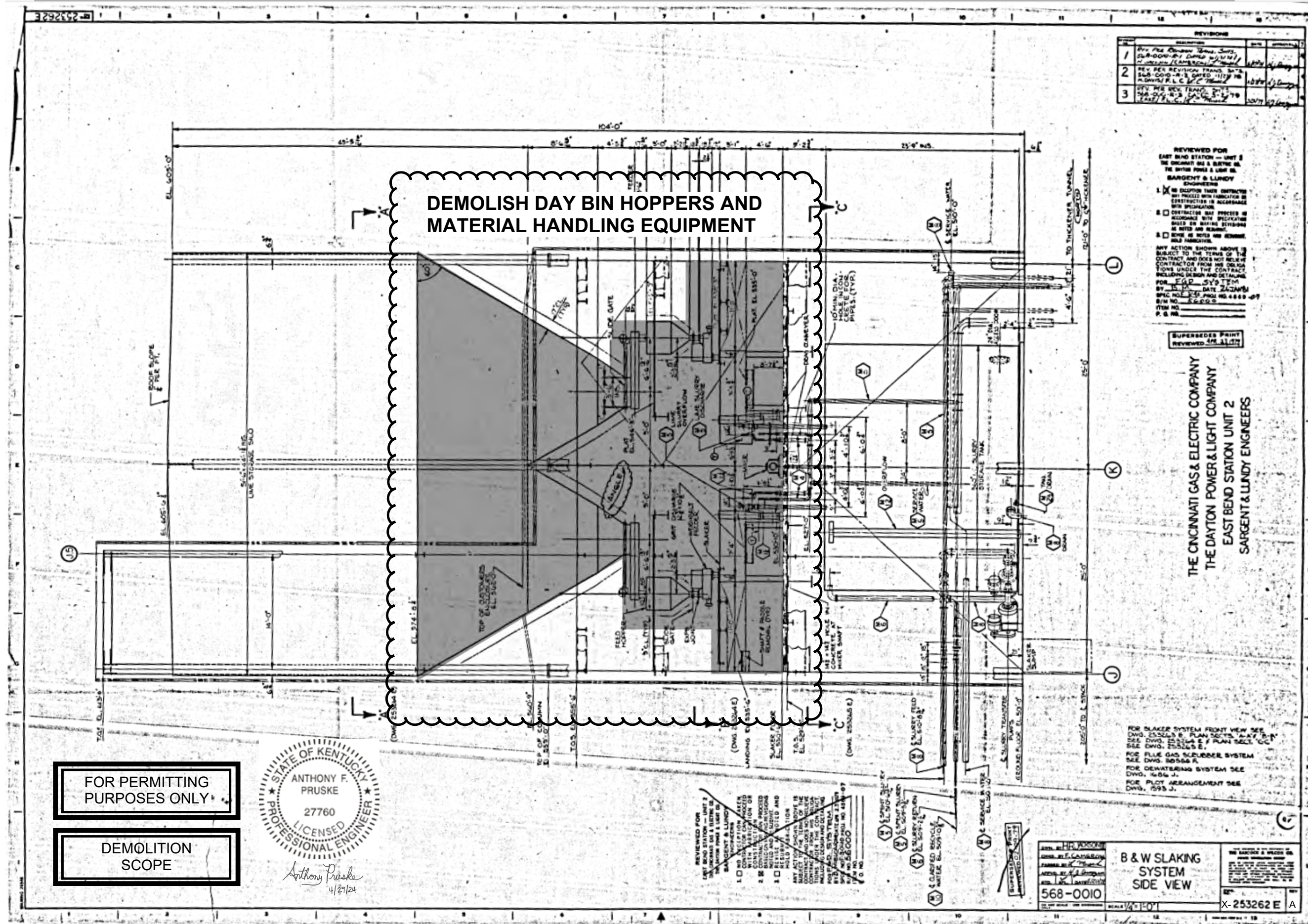
TITLE		P&ID SLUDGE (WB) THICKENER UNDERFLOW FGD SYSTEM	
FOR		EAST BEND STATION - UNIT 2	
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DWG TYPES: ML		DFT: SL	
JOB NO: 4888-07		CHK: RAJ	
DATE: 5-31-78		ENGR: WCS	
FILENAME: EBS_02_S&I_M-2810-2.dgn		APP: WCS	
DRAWING NO.		REVISION	
X- M-2810-2		A	

REV	DATE	JOB NO.	PROJECT TYPE	DES	APP	ENGR	APP
1.0	02/09/20	4888000	REPLTIES	***	WCS	RAJ	WCS
DESC: CCF EBS-05395-SUMMER 2019 REPLTIES							
REV	DATE	JOB NO.	PROJECT TYPE	DES	APP	ENGR	APP
1.1	10/25/19	4888000	AS BUILT	RLC	DKH		
DESC: CONFORMING TO CONSTRUCTION RECORDS							









NO.	REVISION	DATE	BY
1	REV. PER REVISION FRANS. SARGENT & LUNDY ENGINEERS	10/27/11	[Signature]
2	REV. PER REVISION FRANS. SARGENT & LUNDY ENGINEERS	10/27/11	[Signature]
3	REV. PER REVISION FRANS. SARGENT & LUNDY ENGINEERS	10/27/11	[Signature]

REVIEWED FOR EAST BEND STATION - UNIT 2 THE DAYTON GAS & ELECTRIC CO. BY THE DAYTON POWER & LIGHT CO. SARGENT & LUNDY ENGINEERS

1.  NO EXCEPTION TAKE CONTRACTS BY PROCEED WITH EXECUTION OF CONSTRUCTION IN ACCORDANCE WITH SPECIFICATION

2.  CONTRACTOR HAS PROVIDED IN ACCORDANCE WITH SPECIFICATION SALES OR BUYING ORDERS AND IS NOT IN RECEIPT

3.  WORK IS NOTED AND REMAINS UNCOMPLETED

ANY ACTION SHOWN ABOVE IS SUBJECT TO THE TERMS OF THE CONTRACT AND DOES NOT RELIEVE CONTRACTOR FROM HIS OBLIGATIONS UNDER THE CONTRACT INCLUDING DESIGN AND DETAILING FOR E.P.D. SYSTEM BY DATE 2/28/11 SPEC. NO. 245 PILE NO. 4849-07 ITEM NO. 56000 P. & N.

SUPERSEDES PRINT  
REVIEWED 4/29/14

THE CINCINNATI GAS & ELECTRIC COMPANY  
THE DAYTON POWER & LIGHT COMPANY  
EAST BEND STATION UNIT 2  
SARGENT & LUNDY ENGINEERS

FOR SLAKER SYSTEM FRONT VIEW SEE DWG. 253262 B & PLAN SECT. 'A-A' & 'B-B' SEE DWG. 253262 E & F PLAN SECT. 'CC' SEE DWG. 253262 S.

FOR FLUE GAS SCRUBBER SYSTEM SEE DWG. 253262 R.

FOR DEWATERING SYSTEM SEE DWG. 1454 J.

FOR PLOT ARRANGEMENT SEE DWG. 2593 J.

REVIEWED FOR EAST BEND STATION - UNIT 2 THE DAYTON GAS & ELECTRIC CO. BY THE DAYTON POWER & LIGHT CO. SARGENT & LUNDY ENGINEERS

1.  NO EXCEPTION TAKE CONTRACTS BY PROCEED WITH EXECUTION OF CONSTRUCTION IN ACCORDANCE WITH SPECIFICATION

2.  CONTRACTOR HAS PROVIDED IN ACCORDANCE WITH SPECIFICATION SALES OR BUYING ORDERS AND IS NOT IN RECEIPT

3.  WORK IS NOTED AND REMAINS UNCOMPLETED

ANY ACTION SHOWN ABOVE IS SUBJECT TO THE TERMS OF THE CONTRACT AND DOES NOT RELIEVE CONTRACTOR FROM HIS OBLIGATIONS UNDER THE CONTRACT INCLUDING DESIGN AND DETAILING FOR E.P.D. SYSTEM BY DATE 2/28/11 SPEC. NO. 245 PILE NO. 4849-07 ITEM NO. 56000 P. & N.

FOR PERMITTING PURPOSES ONLY

DEMOLITION SCOPE

STATE OF KENTUCKY  
ANTHONY F. PRUSKE  
27760  
LICENSED PROFESSIONAL ENGINEER

*Anthony Pruske*  
4/29/14

568-0010

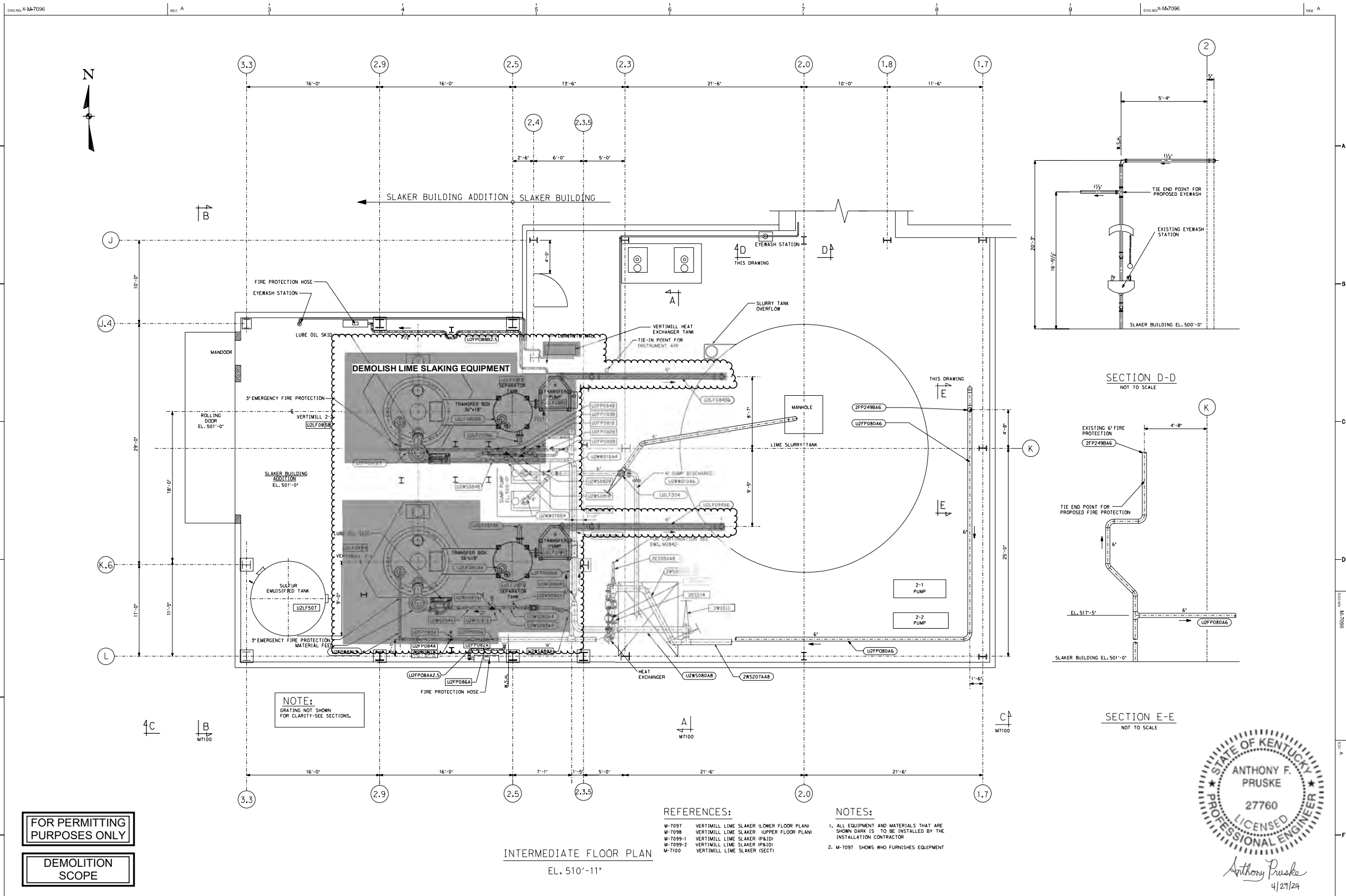
B & W SLAKING SYSTEM SIDE VIEW

SCALE 1/4" = 1'-0"

X-253262 E A







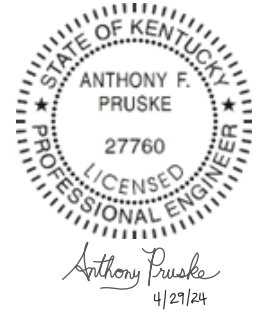
**FOR PERMITTING PURPOSES ONLY**

**DEMOLITION SCOPE**

**NOTE:**  
GRATING NOT SHOWN FOR CLARITY-SEE SECTIONS.

- REFERENCES:**
- M-7097 VERTIMILL LIME SLAKER LOWER FLOOR PLAN
  - M-7098 VERTIMILL LIME SLAKER UPPER FLOOR PLAN
  - M-7099-1 VERTIMILL LIME SLAKER (P&ID)
  - M-7099-2 VERTIMILL LIME SLAKER (P&ID)
  - M-7100 VERTIMILL LIME SLAKER (SECT)
- NOTES:**
- ALL EQUIPMENT AND MATERIALS THAT ARE SHOWN DARK IS TO BE INSTALLED BY THE INSTALLATION CONTRACTOR
  - M-7097 SHOWS WHO FURNISHES EQUIPMENT

**INTERMEDIATE FLOOR PLAN**  
EL. 510'-11"

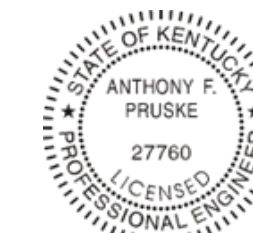


NOTES:				DRAWING REVISIONS				CONTRACTOR/REVISIONS				SEAL			
												EAST BEND STATION - UNIT 2			
												FOSSIL HYDRO OPERATIONS			
												PAGE: 0001			
												EBS			
												PROJECT NO: 4869			
												SHEET: 42x30"			
												DATE: 12-3-19			
												DRAWN: RJB			
												CHECKED: DJH			
												DATE: 12-3-19			
												PROJECT: 6330-WWT			
												DRAWING: EBS-02256			
												CONTRACTOR: [REDACTED]			
												SCALE: 1/4" = 1'-0"			
												PROF. SEAL: [REDACTED]			
												DATE: 4/23/24			
												PROJECT: X-M-7096			
												SHEET: A			

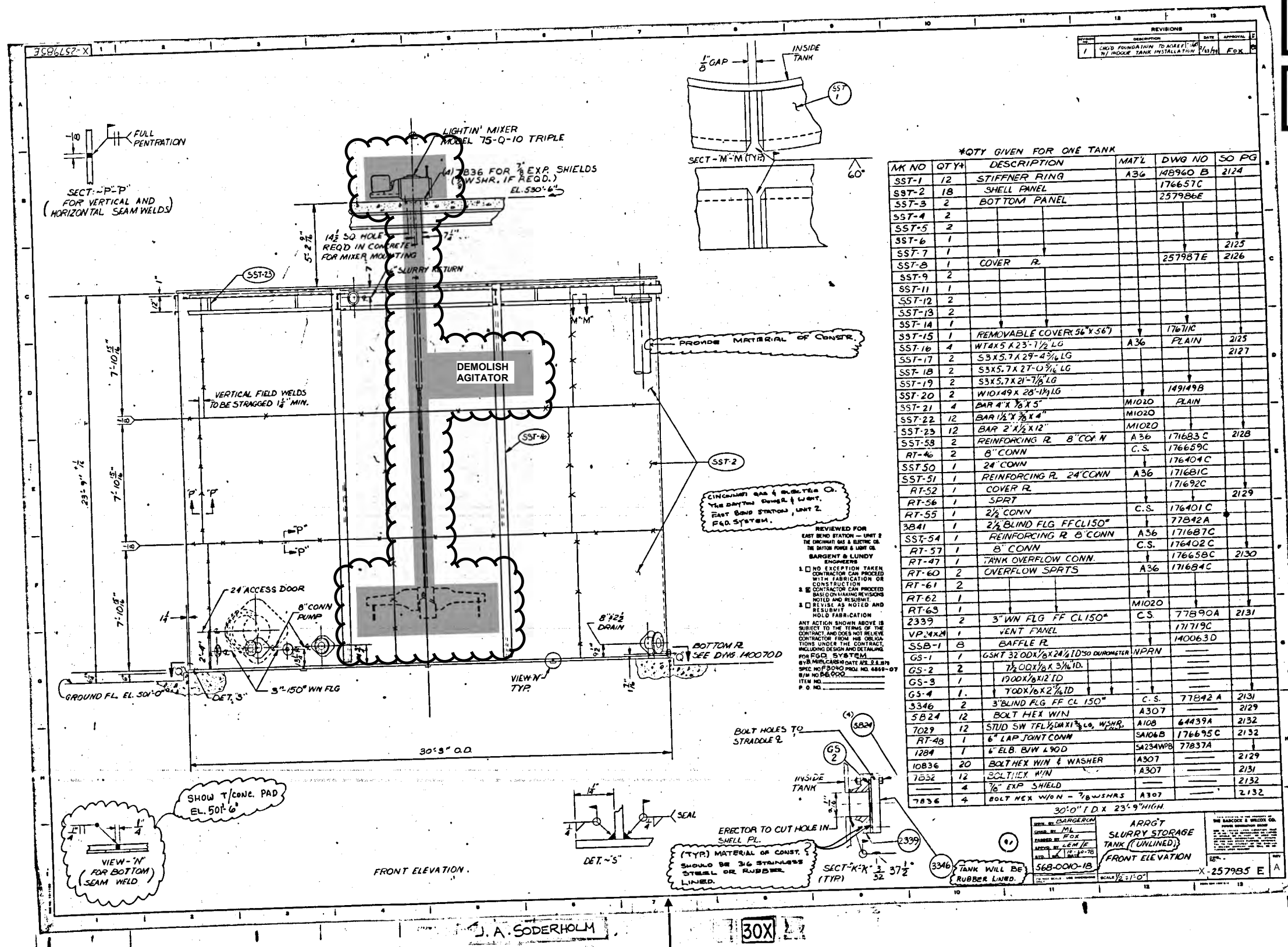


FOR PERMITTING PURPOSES ONLY

DEMOLITION SCOPE



Anthony Pruske  
4/29/24



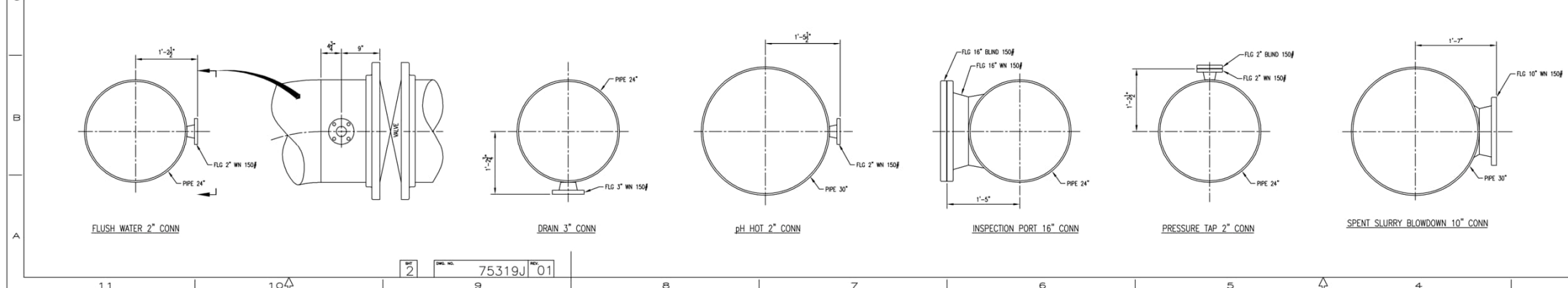
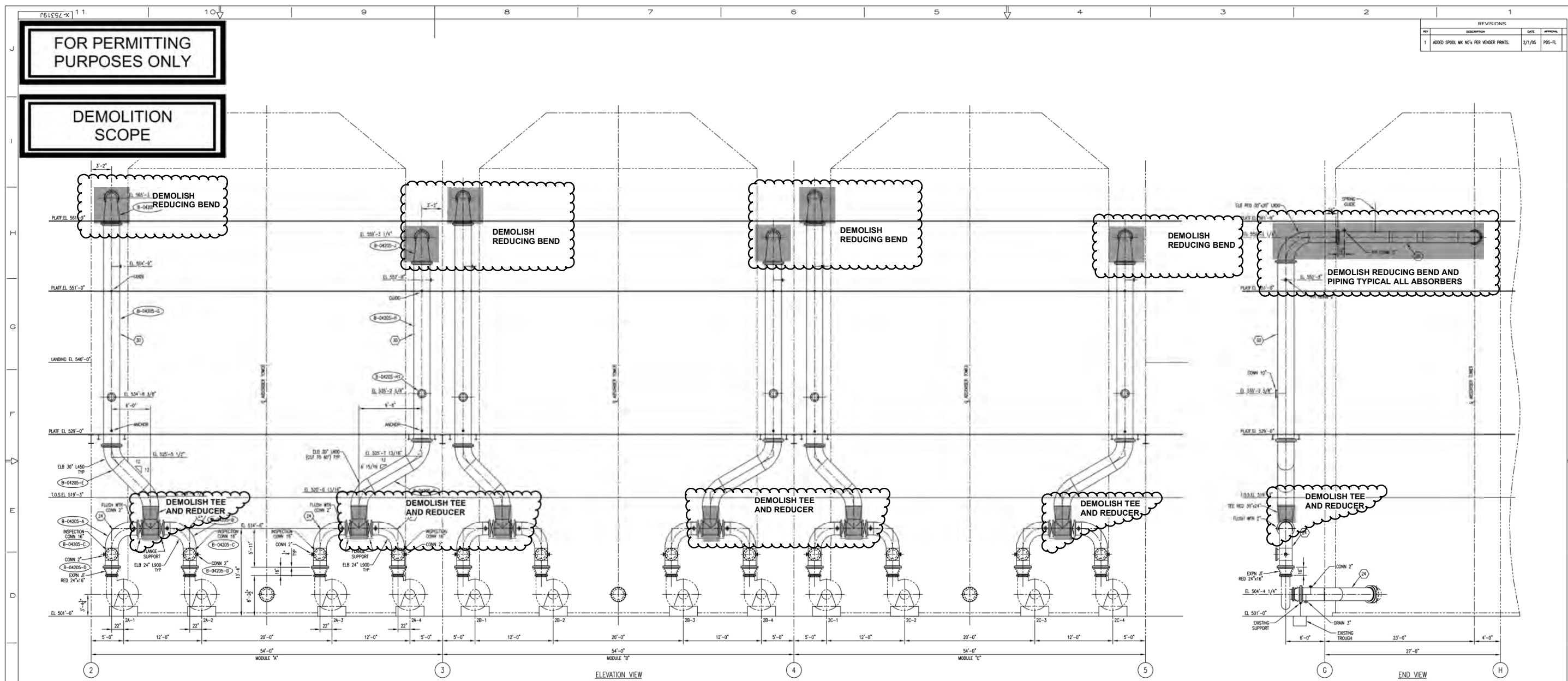
J. A. SODERHOLM

30X

REVISIONS			
NO.	DESCRIPTION	DATE	APPROVAL
1	ADDED SPOOL W/ NO'S PER VENDOR PRINTS	2/7/05	POS-FL

**FOR PERMITTING PURPOSES ONLY**

**DEMOLITION SCOPE**



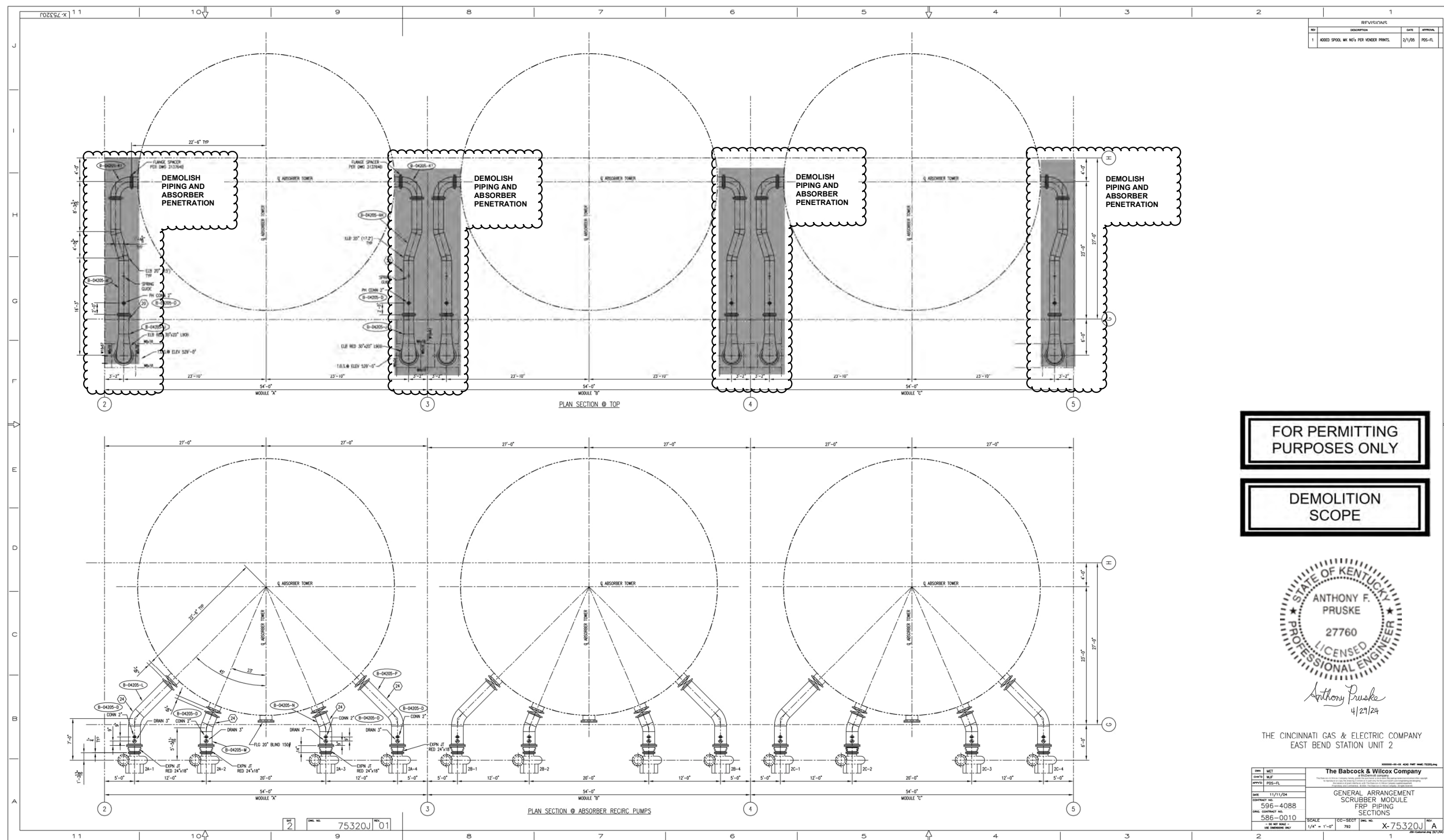
*Anthony Pruske*  
4/29/24

THE CINCINNATI GAS & ELECTRIC COMPANY  
EAST BEND STATION UNIT 2

DATE	11/11/24	PROJECT	596-4088
DRAWN BY	POS-FL	SCALE	1/4" = 1'-0"
CHECKED BY		DATE	11/11/24
PROJECT NO.	596-4088	SCALE	1/4" = 1'-0"
DRAWING NO.	586-0010	DATE	11/11/24
PROJECT NAME	GENERAL ARRANGEMENT SCRUBBER MODULE FRP PIPING SECTIONS	SCALE	1/4" = 1'-0"
DRAWING NO.	X-75319J A	DATE	11/11/24

2 75319J 01





FOR PERMITTING PURPOSES ONLY

DEMOLITION SCOPE



Anthony Pruske  
4/27/24

THE CINCINNATI GAS & ELECTRIC COMPANY  
EAST BEND STATION UNIT 2

DATE	11/11/04	PROJECT	596-4088
CONTRACT NO.	596-4088	SCALE	1/4" = 1'-0"
DRAWING CONTRACT NO.	586-0010	CC-SECT	792
DATE	11/11/04	DWG. NO.	X-75320J A

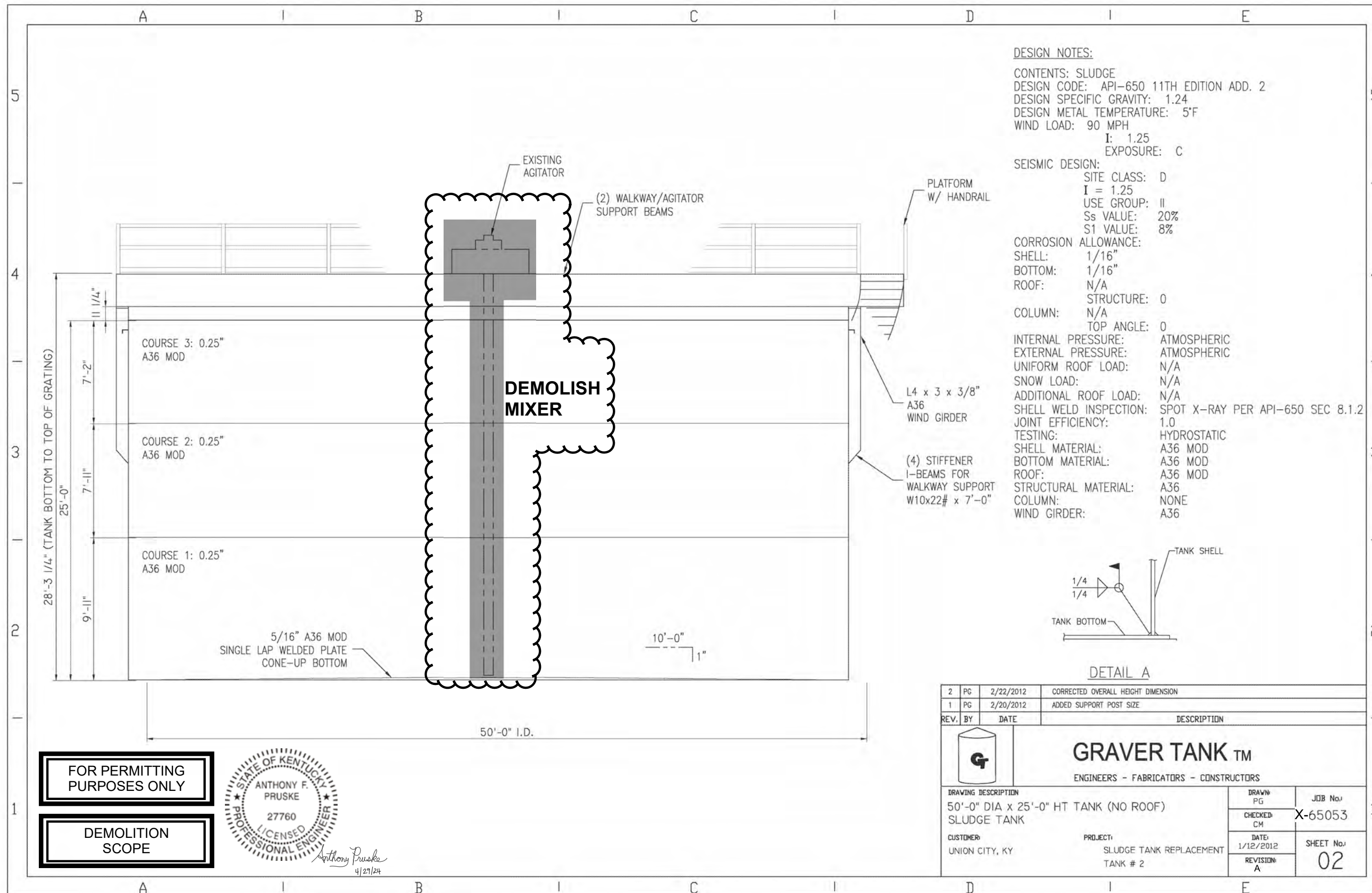
75320J 01











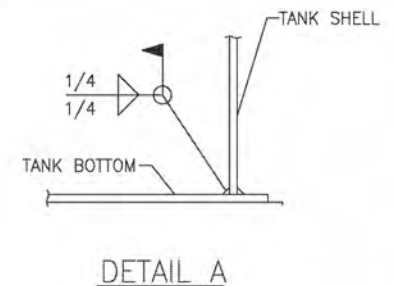
**DESIGN NOTES:**  
 CONTENTS: SLUDGE  
 DESIGN CODE: API-650 11TH EDITION ADD. 2  
 DESIGN SPECIFIC GRAVITY: 1.24  
 DESIGN METAL TEMPERATURE: 5°F  
 WIND LOAD: 90 MPH  
 I: 1.25  
 EXPOSURE: C


**SEISMIC DESIGN:**  
 SITE CLASS: D  
 I = 1.25  
 USE GROUP: II  
 S<sub>s</sub> VALUE: 20%  
 S<sub>1</sub> VALUE: 8%

**CORROSION ALLOWANCE:**  
 SHELL: 1/16"  
 BOTTOM: 1/16"  
 ROOF: N/A

**STRUCTURE:** 0  
**TOP ANGLE:** 0

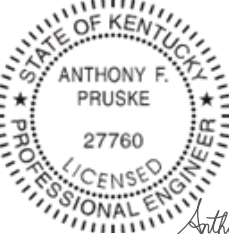
**INTERNAL PRESSURE:** ATMOSPHERIC  
**EXTERNAL PRESSURE:** ATMOSPHERIC  
**UNIFORM ROOF LOAD:** N/A  
**SNOW LOAD:** N/A  
**ADDITIONAL ROOF LOAD:** N/A  
**SHELL WELD INSPECTION:** SPOT X-RAY PER API-650 SEC 8.1.2  
**JOINT EFFICIENCY:** 1.0  
**TESTING:** HYDROSTATIC  
**SHELL MATERIAL:** A36 MOD  
**BOTTOM MATERIAL:** A36 MOD  
**ROOF:** A36 MOD  
**STRUCTURAL MATERIAL:** A36  
**COLUMN:** NONE  
**WIND GIRDER:** A36



2	PG	2/22/2012	CORRECTED OVERALL HEIGHT DIMENSION
1	PG	2/20/2012	ADDED SUPPORT POST SIZE
REV.	BY	DATE	DESCRIPTION
 <b>GRAVER TANK™</b> ENGINEERS - FABRICATORS - CONSTRUCTORS			
DRAWING DESCRIPTION		DRAWN PG	JOB No.
50'-0" DIA x 25'-0" HT TANK (NO ROOF)		CHECKED CM	X-65053
SLUDGE TANK		DATE: 1/12/2012	SHEET No.:
CUSTOMER:	PROJECT:	REVISION: A	02
UNION CITY, KY	SLUDGE TANK REPLACEMENT TANK # 2		

FOR PERMITTING PURPOSES ONLY

DEMOLITION SCOPE

  
 ANTHONY F. PRUSKE  
 27760  
 LICENSED PROFESSIONAL ENGINEER  
*Anthony Pruske*  
 4/27/24



Anthony Pruske  
Project Engineer  
T: 512-924-7268 (c)  
E: anthony.pruske@aecom.com

AECOM  
13640 Briarwick Dr.  
Suite 200  
Austin, TX 78729  
aecom.com

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter of:

The Electronic Application of Duke Energy	)	
Kentucky, Inc. for a Certificate of Public	)	
Convenience and Necessity to Convert its Wet Flue	)	Case No. 2024-00152
Gas Desulfurization System from a Quicklime	)	
Reagent Process to a Limestone Reagent Handling	)	
System at its East Bend Generating Station and for	)	
Approval to Amend its Environmental Compliance	)	
Plan for Recovery by Environmental Surcharge	)	
Mechanism	)	

**CERTIFICATE OF NOTICE AND PUBLICATION**

Pursuant to the Kentucky Public Service Commission’s Regulation 807 KAR 5:001, Section 16(1)(b)(5), I hereby certify that I am Amy B. Spiller, President of Duke Energy Kentucky, Inc. (Duke Energy Kentucky or Company), a utility furnishing retail electric and gas service within the Commonwealth of Kentucky, which, on the 25<sup>th</sup> day of July 2024, will file an application with the Kentucky Public Service Commission requesting an order granting Duke Energy Kentucky a Certificate of Public Convenience and Necessity for the construction, and conversion of its existing Wet Flue Gas Desulfurization (WFGD) from a quicklime-based handling process to a limestone - based handling process in order to continue to meet existing environmental regulations (Limestone Conversion Project). The Limestone Conversion Project will be located at the Company’s East Bend Generating Station. Additionally, the Company is requesting an order authorizing Duke Energy Kentucky to recover the environmental compliance costs of the construction, conversion and operation of the Limestone Conversion Project through amending its Environmental Compliance Plan and its environmental surcharge through its Rate Schedule ESM as required by KRS 278.183, and as applicable KRS 278.020(1). Duke Energy Kentucky is proposing changes to its Environmental Surcharge Mechanism tariff sheet, K.Y.P.S.C. No. 19, Sheet No. 76 and notice

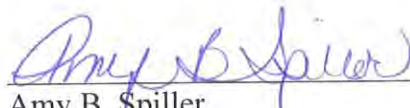
to the public of the filing of the application is being given in all respects as required by 807 KAR 5:001, Section 17 and 807 KAR 5:001, Sections 8(2)(c) and 9(2), as follows:

On the 25<sup>th</sup> day of July 2024, the notice to the public was delivered for exhibition and public inspection at Duke Energy's Erlanger Ops Center, 1262 Cox Road, Erlanger, Kentucky 41018 and the same will be kept open to public inspection at said office in conformity with the requirements of 807 KAR 5:001, Section 17(1)(a) and 807 KAR 5:011, Section 8(1)(a).

I further certify that more than twenty (20) customers will be affected by said change by way of an increase in their rates or charges, and that on the 10<sup>th</sup> day of July 2024, there was delivered to the Kentucky Press Association, an agency that acts on behalf of newspapers of general circulation throughout the Commonwealth of Kentucky in which customers affected reside, a notice of the Company's Application, including proposed rates for publication therein once a week for three consecutive weeks beginning on July 19, 2024. A copy of said notice is attached hereto as Exhibit A, and a list of newspapers of general circulation throughout the Commonwealth of Kentucky in which customers affected reside, is being attached hereto as Exhibit B. A certificate of publication of said notice will be furnished to the Kentucky Public Service Commission upon completion of same pursuant to 807 KAR 5:001, Section 17(3)(b).

Also, beginning on July 25, 2024, Duke Energy Kentucky posted on its website a complete copy of the Company's application and a hyperlink to the location on the Kentucky Public Service Commission's website where the case documents and tariff filings are available.

Given under my hand this 25<sup>th</sup> day of July 2024.



Amy B. Spiller  
President, Duke Energy Kentucky, Inc.  
139 E. 4<sup>th</sup> Street  
Cincinnati, Ohio 45202

Subscribed and sworn to before me, a Notary Public, in and before said County and State,  
this 25<sup>th</sup> day of July 2024.

*Emilie Sunderman*

Notary Public

My Commission expires: *July 8, 2027*



EMILIE SUNDERMAN  
Notary Public  
State of Ohio  
My Comm. Expires  
July 8, 2027

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on July 25<sup>th</sup>, 2024; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

John G. Horne, II  
The Office of the Attorney General  
Utility Intervention and Rate Division  
700 Capital Avenue, Ste 118  
Frankfort, Kentucky 40601

*/s/Rocco D'Ascenzo*  
\_\_\_\_\_  
*Counsel for Duke Energy Kentucky, Inc.*

# Exhibit A

## Notice of the Filing



NOTICE TO CUSTOMERS OF  
DUKE ENERGY KENTUCKY, INC.

RECOVERY BY ENVIRONMENTAL SURCHARGE OF DUKE ENERGY KENTUCKY, INC.'S  
AMENDMENT TO ITS 2021 AMENDED ENVIRONMENTAL COMPLIANCE PLAN

**PLEASE TAKE NOTICE** that Duke Energy Kentucky, Inc. ("Duke Energy Kentucky" or "Company") is filing with the Kentucky Public Service Commission ("Commission") on or about July 19, 2024 in Case No. 2024-00152, an Application pursuant to Kentucky Revised Statute 278.183 for approval of the construction of the Limestone Conversion Project (Project) located at its East Bend Generating Station ("East Bend") and an amendment of the Company's Environmental Compliance Plan to include the Project for the purpose of recovering the capital and operations and maintenance (O&M) costs associated with the Project through an increase in the environmental surcharge on customers' bills beginning March 1, 2025 under the Company's existing Rider ESM, also known as the environmental surcharge mechanism. The total capital cost of the Limestone Conversion Project in the Company's Amended Environmental Compliance Plan is estimated to be \$125.8 million.

Federal and state environmental regulations require Duke Energy Kentucky to build and upgrade equipment and facilities that produce energy from coal to operate in an environmentally sound manner. Specifically, the Company is seeking Commission approval of a Certificate of Public Convenience and Necessity for the construction and operation of the Project. This construction project requires an amendment of Duke Energy Kentucky's Amended Environmental Compliance Plan that was approved by the Commission in 2022.

Additionally, Duke Energy Kentucky is seeking an order approving the recovery of the costs of the Project through its Environmental Surcharge tariff. The Project is required for the Company to continue to comply with the U.S. Environmental Protection Agency's federal Clean Air Act, and other environmental requirements that apply to Duke Energy Kentucky facilities used in the production of energy from coal. The total capital cost of the Project for which the Company is seeking recovery at this time is estimated to be \$125.8 million. O&M costs related to the Project will be similar to O&M costs incurred today and are not distinguishable.

The impact on Duke Energy Kentucky's customers is estimated to be an increase of 1.0% for residential customers and 1.0% on average for non-residential customers in 2025, 2.8% for residential customers and 2.7% on average for non-residential customers in 2026, 2.1% for residential customers and 2.1% on average for non-residential customers in 2027, 1.8% for residential customers and 1.7% on average for non-residential customers in 2028, and 1.8% for residential customers and 1.8% on average for non-residential customers in 2029. For a Duke Energy Kentucky residential customer using 1000 kilowatt hours per month (kWh/mo.), the initial monthly increase is expected to be \$1.32 during 2025, \$3.63 in 2026, \$2.72 in 2027, \$2.25 in 2028, and \$2.33 in 2029.

The rates contained in this notice are the rates proposed by Duke Energy Kentucky; however, the Kentucky Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice. Such action may result in rates for consumers other than the rates in this notice.

Any corporation, association, body politic or person with a substantial interest in the matter may, by written request within thirty (30) days after publication of this notice of the proposed rate changes, request leave to intervene; intervention may be granted beyond the thirty (30) day period for good cause shown. Such motion shall be submitted to the Kentucky Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615, and shall set forth the grounds for the request including the status and interest of the party. If the Commission does not receive a written request for intervention within thirty (30) days of the initial publication the Commission may take final action on the application.

Intervenors may obtain copies of the application and other filings made by the Company by requesting same through email at [DEKInquiries@duke-energy.com](mailto:DEKInquiries@duke-energy.com) or by telephone at (513) 287-4366. A copy of the application and other filings made by the Company are available for public inspection through the Commission's website at <http://psc.ky.gov>, at the Commission's office at 211 Sower Boulevard, Frankfort, Kentucky, Monday through Friday, 8:00 a.m. to 4:30 p.m., and at the following Company office: Erlanger Ops Center, 1262 Cox Road, Erlanger, Kentucky 41018. Comments regarding the application may be submitted to the Public Service Commission through its website, or by mail at the following Commission address.

For further information contact:

PUBLIC SERVICE COMMISSION  
COMMONWEALTH OF KENTUCKY  
P.O. BOX 615  
211 SOWER BOULEVARD  
FRANKFORT, KENTUCKY 40602-0615  
(502) 564-3940

DUKE ENERGY KENTUCKY  
1262 COX ROAD  
ERLANGER, KENTUCKY 41018  
(513) 287-4366

## **Exhibit B**

### **Listing of Newspapers Publishing Notice**

List of Newspapers in Duke Energy Kentucky Territory

Covington Kentucky Enquirer

Falmouth Outlook

Link NK

Warsaw Gallatin County News

Williamstown Grant County News

KY. P.S.C. Electric No. 2  
~~Fourth~~ Revised Sheet No. 76  
 Cancels and Supersedes  
~~Third~~ Revised Sheet No.

Duke Energy Kentucky, Inc.  
 1262 Cox Road  
 76  
 Erlanger, Kentucky 41018

Page 1 of 2

## ENVIRONMENTAL SURCHARGE MECHANISM RIDER

### APPLICABILITY

This rider is applicable to all retail sales in the Company's electric service area beginning with the billing month June 2018. Rate RTP program participants utilize the applicable portions of the Baseline Charge and Program Charge, as those terms are defined in Rate RTP, for this rider.

Standard electric rate schedules subject to this schedule are:

Residential: Rate Schedules RS and RS-TOU-CPP

Non-Residential: Rate Schedules DS, EH, SP, DP, DT, GSFL, TT, SL, TL, UOLS, NSU, SC, SE, and LED

(N)

### RATE

The monthly billing amount under each of the schedules to which this rider is applicable, shall be increased or decreased by a percentage factor according to the following formula:

Environmental Surcharge Billing Factor = Jurisdictional E(m) / R(m)

### DEFINITIONS

For all Plans:

E(m) = RORB + OE – EAS + Prior Period Adjustment + (Over)Under Recovery

RORB = (RB/12)\*ROR

RB = the Environmental Compliance Rate Base, defined as electric plant in service for applicable environmental projects adjusted for accumulated depreciation, accumulated deferred taxes, accumulated investment tax credits, CWIP and emission allowance inventory.

ROR = the Rate of Return on the Environmental Compliance Rate Base, designated as the cost of debt and pretax cost of equity for environmental compliance plan projects approved by the Commission.

OE = the Operating Expenses, defined as the monthly depreciation expense, taxes other than income taxes, amortization expense, emission allowance expense and environmental reagent expense.

EAS = proceeds from Emission Allowance Sales.

Issued by authority of an Order of the Kentucky Public Service  
 Commission dated ~~October 12, 2023~~ in Case No. ~~2024-00152~~~~2022-00372~~.

Issued: ~~October 27, 2023~~ July 25, 2024

Effective: ~~October 13, 2023~~ August 26, 2024

Issued by Amy B. Spiller, President /s/ Amy B. Spiller

KY. P.S.C. Electric No. 2

~~Fourth~~ Revised Sheet No. 76

Cancels and Supersedes

~~Third~~ Revised Sheet No.

Duke Energy Kentucky, Inc.  
1262 Cox Road  
76  
Erlanger, Kentucky 41018

Page 2 of 2

### DEFINITIONS (Contd.)

Prior Period Adjustment is the amount resulting from the amortization of amounts determined by the Commission during six-month and two-year reviews.

(Over) or Under Recovery is a one-month "true-up" adjustment.

Plans are the environmental surcharge compliance plans submitted to and approved by the Kentucky Public Service Commission.

- (1) Total E(m), (the environmental compliance plan revenue requirement), is multiplied by the Jurisdictional Allocation Factor. Jurisdictional E(m) is adjusted for any (Over)/Under collection or prior period adjustment to arrive at Adjusted Jurisdictional E(m). Adjusted Jurisdictional E(m) is allocated to Residential and Non-Residential on the basis of Revenue as a Percentage of Total Revenue for the 12 months ending with the Current Month.
- (2) Residential R(m) is the average of total monthly residential revenue for the 12 months ending with the current expense month. Total revenue includes residential revenue, including all riders, but excluding environmental surcharge mechanism revenue.
- (3) Non-Residential R(m) is the average of total monthly non-residential revenue for the 12 months ending with the current expense month. Total revenue includes non-residential revenue, including all riders, but excluding environmental surcharge mechanism revenue, base fuel revenue and FAC revenue.
- (4) The current expense month (m) shall be the second month proceeding the month in which the Environmental Surcharge is billed.

### SERVICE REGULATIONS, TERMS AND CONDITIONS

The supplying and billing for service and all conditions applying thereto, are subject to the jurisdiction of the Kentucky Public Service Commission, and to Company's Service Regulations currently in effect, as filed with the Public Service Commission of Kentucky.

Issued by authority of an Order of the Kentucky Public Service  
Commission dated ~~October 12, 2023~~ in Case No. ~~2024-~~  
~~001522022-00372~~.

Issued: ~~October 27, 2023~~ July 25, 2024

Effective: ~~October 13, 2023~~ August 26, 2024

Issued by Amy B. Spiller, President /s/ Amy B. Spiller