

Archived: Thursday, May 31, 2012 3:41:17 PM
From: [Eric M. Robeson](#)
Sent: Monday, October 03, 2011 4:35:00 PM
To: ADAM.C.LANDRY@sargentlundy.com
Subject: RE: BREC Utility MACT and 316(b) Issues
Importance: Normal

[Can we talk Tuesday](#)

[Open between 7:30 and 8:30 and 10:30 to 11:30](#)

[Eric](#)

From: ADAM.C.LANDRY@sargentlundy.com [<mailto:ADAM.C.LANDRY@sargentlundy.com>]
Sent: Friday, September 23, 2011 4:05 PM
To: Eric M. Robeson
Subject: BREC Utility MACT and 316(b) Issues

Eric,

I want to bring to your attention a few issues that we should fully understand:

1. Section 3.3.5.3 of the Environmental Regulatory Review discusses the proposed utility MACT rule governing non-mercury metal HAP emission limits. As the rule is currently stated, the utility will have the option to use TPM as a surrogate for continuous monitoring. The rule also states that during initial testing both non-mercury HAP metals and TPM will be tested. What is unknown is what will happen if a utility fails to meet both total non-mercury HAP metals and TPM emissions limits during initial testing. There have been several comments on this portion of the rule as the ICR data shows conflicting data with respect to existing ESP performance. Several utilities have shown that they are able to achieve the TPM limit with existing ESP technology or ESP upgrades and still not be able to meet individual or total non-mercury HAP metals limits. Because the utility MACT rule has not been finalized and this particular issue has raised a fair amount of controversy, there is inherent risk in choosing how to approach compliance. BREC will most likely be able to meet the TPM limits with ESP upgrades or existing ESPs but the recent stack testing data shows that it is unlikely that total non-mercury HAP limits would be achievable without use of a baghouse.

I am aware that other utilities are taking different stances concerning this unknown. One approach taken is that regardless of the outcome of the initial testing, compliance with only one option will be required, and therefore they are moving forward with ESP upgrades to achieve TPM compliance. The other approach taken is that compliance with the more stringent release will be required, and therefore, baghouse retrofits

will be required to meet the non-mercury metal HAP emission limits, as compliance with the non-mercury HAP emission limits will most likely not be possible with the ESPs.

2. As currently constructed, 316(b) is separated into three phases. The first phase governs only new units and has been implemented. Phase two governs existing facilities with a total design intake flow of greater than 2 million gallons per day from waters of the US **and** twenty-five percent or more of the water it withdraws is used exclusively for cooling purposes. (measured on an average annual basis for each calendar year) Therefore, Sebree may be exempt from the proposed rule if 75% or more of the water being taken in is used by the city of Henderson for purposes other than cooling. More operational data regarding the actual flow rates used by the plant and the city are required as well as knowledge of what the city of Henderson does with the water sales. We will be contacting Sebree to determine if we can ascertain the amount of water used on-site vs. the amount delivered to the city of Henderson, to see where we may fall.

Regards,

Adam C. Landry
Professional Engineer of Indiana, Illinois, Alberta
Project Manager

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