

Archived: Thursday, May 31, 2012 3:41:07 PM
From: [Eric M. Robeson](#)
Sent: Thursday, December 22, 2011 10:08:00 AM
To: ADAM.C.LANDRY@sargentlundy.com
Subject: RE: MATS'
Importance: Normal

I take item 1 as good for BREC in that all units except Reid were under the 0.03 standard

What is impact of item 3?

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Sent: Thursday, December 22, 2011 10:05 AM
To: Eric M. Robeson
Subject: Re: MATS'

Eric,

The Mercury Air Toxic Standards (or the MATS Rule) document is some 1,117 pages. A very preliminary assessment of the main changes from the proposed MACT:

(1) It appears as though the condensable portion of PM has been excluded. The MATS rule is allowing non-Hg HAP compliance to be demonstrated by the surrogate of filterable particulate matter only, at an emission rate of 0.03 lb/MBtu for existing units. In the proposed rule, 0.03lb/MBtu was the emission limit for total PM (filterable and condensable), so they have relaxed the requirement.

(2) Mercury (1.2 lb/TBtu) and HCl (0.002 lb/mmBtu) limits are unchanged from the proposed rule

(3) If a Unit has an FGD system and has a main stack and bypass stack exhaust configuration it appears that it can not qualify as a Low Emitting EGU. We initially are interpreting this as that the Sebree and Wilson Units could get LEE status for HCl but not the Coleman Units (due to the bypass stack).

(4) Bypass stacks - The final rule states that there are 2 options for bypass stacks; (1) Monitor the bypass stack, or (2) treat any hours of bypass stack use as periods of monitor downtime and hours of deviation from the monitoring requirements (as long as the 30 boiler operating-day emission limits are met). So depending upon frequency of

bypass stack use at Coleman there may not be a necessity for CEMS on the Bypass stacks.

Regards,

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Date: 12/21/2011 03:07 PM
Subject: MATS'

Can you do quick review and see if standards differ from assumptions in our study?

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