

Archived: Thursday, May 31, 2012 4:00:32 PM
From: Tom Shaw
Sent: Thursday, March 15, 2012 8:01:00 AM
To: Eric M. Robeson
Subject: RE: Meeting with KY Division for Air Quality
Importance: Normal

Eric,

Our maximum heat rate is descriptive in our Title V permits so we are not specifically limited by heat rate as we would be if it were a permit limit. That is the reason why I was not interested in bringing heat rate into the discussion of a permit modification. I expect that sometime in the future we will get a permit limit on heat rate, a lot of states already impose one.

Tom

From: Eric M. Robeson
Sent: Wednesday, March 14, 2012 3:12 PM
To: Tom Shaw
Subject: RE: Meeting with KY Division for Air Quality

We can easily say a wet limestone FGD system with 98% removal

I didn't mean we should change heat input, just figured it was already set at max heat input

From: Tom Shaw
Sent: Tuesday, March 13, 2012 4:56 PM
To: Eric M. Robeson
Subject: RE: Meeting with KY Division for Air Quality

Eric,

I will need some commitment on the type of scrubber. I don't think I will need the exact removal efficiency since the unit is already required to meet a 90% removal as a subpart Da source. My intent is to submit an application that states BREC will be

increasing the removal efficiency and possibly provide a range. In regards to the maximum heat input I would rather not change what is currently in our permit concerning that issue.

Tom

From: Eric M. Robeson
Sent: Tuesday, March 13, 2012 4:16 PM
To: Tom Shaw
Subject: RE: Meeting with KY Division for Air Quality

What sort of data will we need to submit relative to Wilson FGD?

We have conceptual emission rates, but no contract guarantees yet.

I assumed it will be based on maximum heat input

Thanks

Eric

From: Tom Shaw
Sent: Tuesday, March 13, 2012 4:05 PM
To: Eric M. Robeson; Mark Bailey; Bob Berry; Jim Miller (jmillersmsmlaw.com); Bryan Reynolds
Subject: Meeting with KY Division for Air Quality

Gentlemen:

Mark Bertram and I met with the KY Division for Air Quality on Monday March 5th to discuss the process to revise Title V permits, for the proposed air pollution control

equipment. The Division appeared to be very interested in hearing about our tentative plans to meet compliance with MATS and CSAPR. I laid out BREC's plan to comply with CSAPR and MATS along with submitting a filing to the PSC in early April.

The agency's position is that all of the affected Title V permits will need to be modified prior to the installation of the control equipment. The agency will act on our permit modifications as quickly as possible, but there is an underlying concern that outside interests may slow the process down with comments. The meeting was in my opinion very positive and I believe the agency will work with BREC to craft the modifications in such a way, that if BREC were to cancel a project we would not be required to construct it. The agency is currently reviewing the Wilson Title V permit and they would like to incorporate the new scrubber modification into this review, as opposed to reopening the permit later in the summer. The plan will be for the agency to hold the Wilson Title V permit for a couple of months for BREC to submit the information on the new scrubber.

Mark Bertram and I will begin the process of creating the modification to the Green and Wilson Title V permits immediately, with the intent to provide the information on the Wilson scrubber first (within the 2 month window). This should give the agency enough time to issue it to BREC prior to the start of construction in 2013. The Green Title V permit has already been issued so it will require reopening the permit to add the SCR. The addition of the SCR will require additional work as in New Source Review issues. I expect to have the Green Title V permit modification to the agency by the first of June. This should be enough time to get the Title permit modified prior to construct in 2013. The remaining Title V permit modification for Reid 1 will begin as soon as the others are completed.

Mercury control will also be included in the permit modifications, but given the time line for construction this will not be a critical path issue for Title V permits this early in the process. The agency is receptive to a one year extension for compliance with MATS, but I will need additional information such as a construction schedule that shows the need for the additional year before I ask for the extension.

I will update the group as I have more information, however, If you have additional questions concerning the meeting or the schedule please do not hesitate to ask.

Tom