From: <rmeyer@amp-ohio.org>
To: "Rod Windle" <Rod.Windle@epa.state.oh.us>
CC: "Dean Ponchak" <dean.ponchak@epa.state.oh.us>, "Chuck Taylor" <ctaylor@g...
Date: 4/9/2009 11:15 AM
Subject: Re: References for Response to Question No. 5
Attachments: ranking presentation.doc; summary 02 2002.pdf; ICR Hg Data.xls

Rod:

Here are our responses. Let me know if additional questions come up.

RMeyer
Director of Environmental Affairs
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(See attached file: ranking presentation.doc)(See attached file: summary 02 2002.pdf)(See attached file: ICR Hg Data.xls)

1. The reference to "continuous monitoring" in the second paragraph on page 2 was included to distinguish stack-test data from continuous monitoring. Specifically, a short-term testing program, such as a single stack test, was not sufficient to demonstrate "achieved in practice". Continuous monitoring would have to reflect the range of operating variables (i.e., load shifts, boiler upsets, fuel changes, equipment variability, etc.) over several years to reflect the emission limit that can be achieved in practice. Although the data theoretically could be assembled from a series of carefully timed stack tests, the most practical means of obtaining these data is through a mercury CEMS which has not been deployed on sources similar to AMPGS. Again, AMP-Ohio is not aware of any long-term mercury emissions monitoring data for boilers similar to the proposed AMPGS that is sufficient to demonstrate a mercury emission rate less than 1.9 lb/TBtu has been "achieved in practice".

2. With respect to the use of the phrase "no discernible best controlled similar source for HAPs other than mercury" in the third paragraph on page 2, AMP-Ohio has identified three other utility projects that appear to be similar to the AMPGS in terms of basic boiler design, size and fuel type: Thoroughbred Generating Station, LLC Units 1 &2, LG&E Trimble Unit #2 and Duke Energy Cliffside Unit #6. These permits include the following limits for HAPs other than mercury:

The permit for Thoroughbred includes lb/mmBtu limits for beryllium (quarterly average), lead (quarterly average), and hydrogen fluoride (30-day rolling average). Thoroughbred also has a ton per year limit for a number of other HAPs.

The permit for LG&E Trimble includes a lb/hr limit for a single HAP, hydrogen fluoride (3-hr rolling average).

The permit for Duke Energy includes provisions that limit emissions of each HAP to less than 10 TPY and total HAPs to less than 25 TPY. Duke Energy must also meet a 99.913% control efficiency for hydrogen chloride emissions.

AMP-Ohio could not discern a best controlled similar source given the significant differences (different pollutants, different averaging times, etc.) in the approaches employed by the various permitting agencies to establish MACT limits at the three facilities that appear to be similar to the AMPGS.

AMP-Ohio has proposed lb/mmBtu (3-hr average), lb/hr (3-hr average) and tons per rolling 12-month period MACT limits for the AMPGS for VOC (surrogate for organic HAPs) and hydrochloric acid (surrogate for all acid gas HAPs). In addition, AMP-Ohio has proposed a lb/mmBtu (3-hr average) MACT limit for PM10 (surrogate for metal HAPs). We believe the limits proposed by AMP-Ohio are appropriate Section 112(g) MACT limits for the AMPGS.

3. The reference to "test data" in the fourth paragraph on page 2 relates to our understanding of the information and data made available by US EPA during the rule development. Attached are several files that include information/data confirming the emissions information compiled by US EPA to support the development of the CAMR rule including short-term (i.e., 3-hr) mercury emission testing. The file "ICR Hg Data.xls" is a summary spreadsheet of data collected in response to US EPA's Information Collection Request (ICR). The third tab of this spreadsheet has detailed information/data for each facility and refers to test data runs 1, 2 and 3. The file "summary 02 2002.pdf" presents minutes from the Clean Air Act Advisory Committee Permits/New Source Review/Air Toxics Subcommittee Utility MACT Working Group Summary of Working Group Meeting on 02/05/02. Those minutes refer to a discussion of the "measurement bias of the stack tests". The file "ranking presentation.doc" summarizes a Presentation to the Utility MACT Stakeholder Group on December 18, 2001 that refers to the assignment to "rank the stack test data". All of these files are referring to the same test data. The attached files can be obtained at:

http://www.epa.gov/ttn/atw/combust/utiltox/utoxpg.html#ICR

"Rod Windle"
<Rod.Windle@epa.state.oh.us>
04/08/2009 03:33 PM

To <rmeyer@amp-ohio.org>
cc "Dean Ponchak" <dean.ponchak@epa.state.oh.us>
Subject Re: References for Response to Question No. 5

Thanks for the response,

We have a few points needing some clarification.

1.) On page 2, the second paragraph has an explanation of achieved in practice. The result was a long term compliance demonstration (i.e. through continuous monitoring). Is the "i.e. through continuous monitoring" meant to be an example or is that AMP's position on what long term compliance demonstrations means?

2.) On page 2, the third paragraph speaks to HAPs other than Hg. What does discernable mean in the second sentence in relation to HAP emissions at other facilities and AMP's project?

3.) On page 2, the fourth paragraph speaks to tests that were performed for NSPS Dc. AMP identified the tests being performed as one 3-hour set of stack tests each. Is this fact or an assumption? If was the position based upon (i.e any documentation)?

Thanks again,
Rod

>>> <rmeyer@amp-ohio.org> 4/8/2009 8:19 AM >>>

Rod:

Here are three references for our statement in response to Question No. 5
regarding chlorine content in PRB coal:

CONTROL OF MERCURY EMISSIONS FROM COAL-FIRED ELECTRIC UTILITY BOILERS: INTERIM REPORT INCLUDING ERRATA DATED 3-21-02 (EPA-600/R-01-109; April 2002) Refer to pages ES-7, 5-4, and 6-7 in this document.

Performance and Cost of Mercury and Multipollutant Emission Control Technology Applications on Electric Utility Boilers (EPA-600/R-03-110; October 2003) Refer to pages 5,15 and 36 in this document.

A Review of DOE/NETL's Mercury Control Technology R&D Program for Coal-Fired Power Plants (April 2003) Refer to page 6 in this document.;

If additional questions come up during review, let me know.

Thanks.

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