



Duke Energy Gallagher Generating Station

Opted to Retire Plant



AEP Big Sandy

**Unit 1 260 MW
Wall-fired boiler**

**Will rebuild as a 640
MW gas-fired boiler**

Completion: 2016

AEP Clinch River

Units 1 and 2
470 MW Total
Vertical Firing

Will be refueled with
natural gas @ 422 MW

Completion: 2015



Xcel Black Dog Generating Station

Units 3 and 4 - 259 MW - Wall Fired

Convert to 688 MW gas-fired

Completion: 2016



Xcel Riverside Station

570 MW

Converted to gas in 2008



Xcel Highbridge Station

511 MW
Converted to gas in 2009



AEP

Muskingum River Plant



Unit 5
585 MW cell-fired

May be refueled with
natural gas @ 510 MW

Completion: 2014

Penn State West Campus Steam Plant

Units 2 and 3

Co-gen plant

4 coal-fired stoker
boilers

110,000 pph steam
each



May be replacement, not retrofit

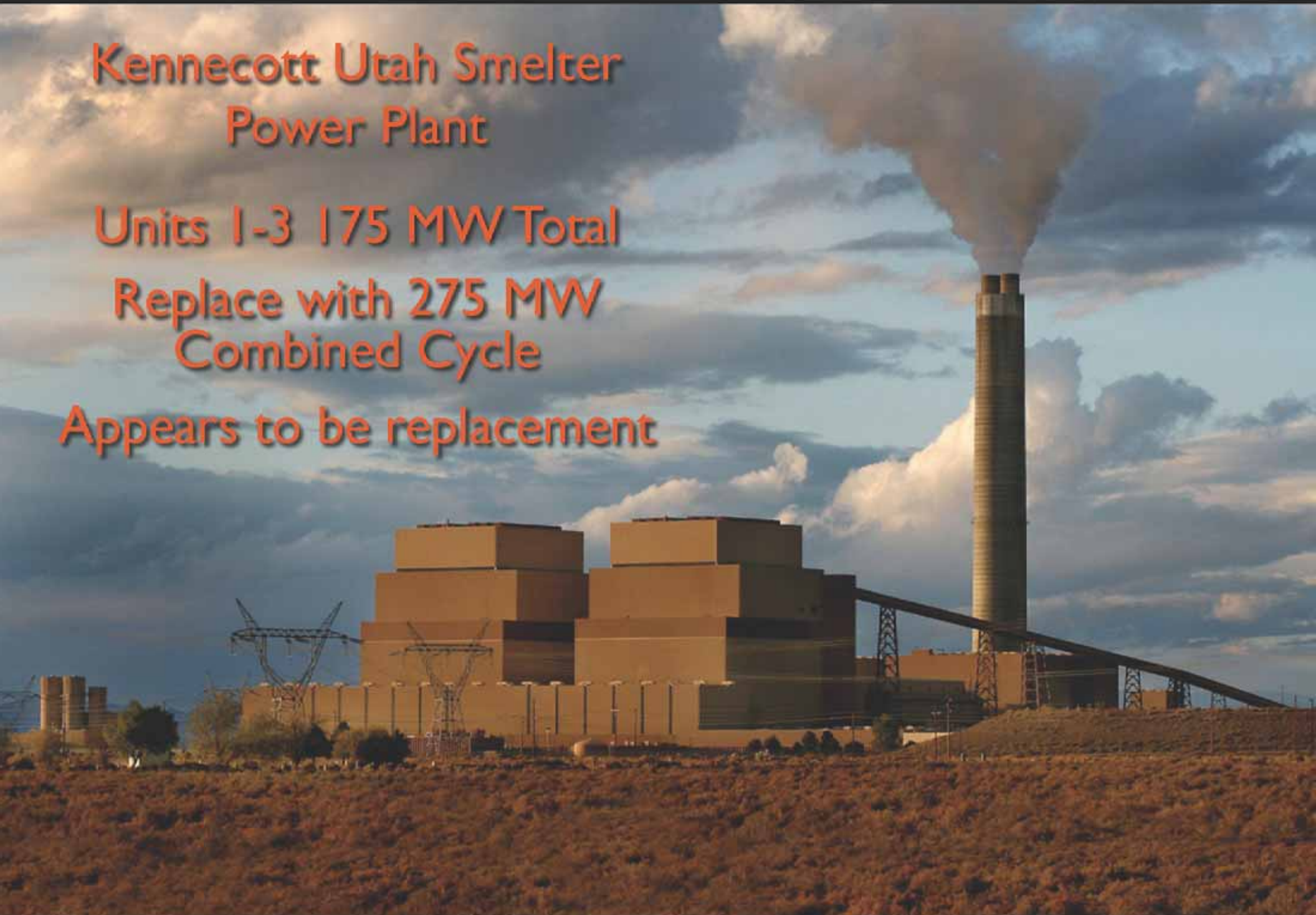
Completion: 2014

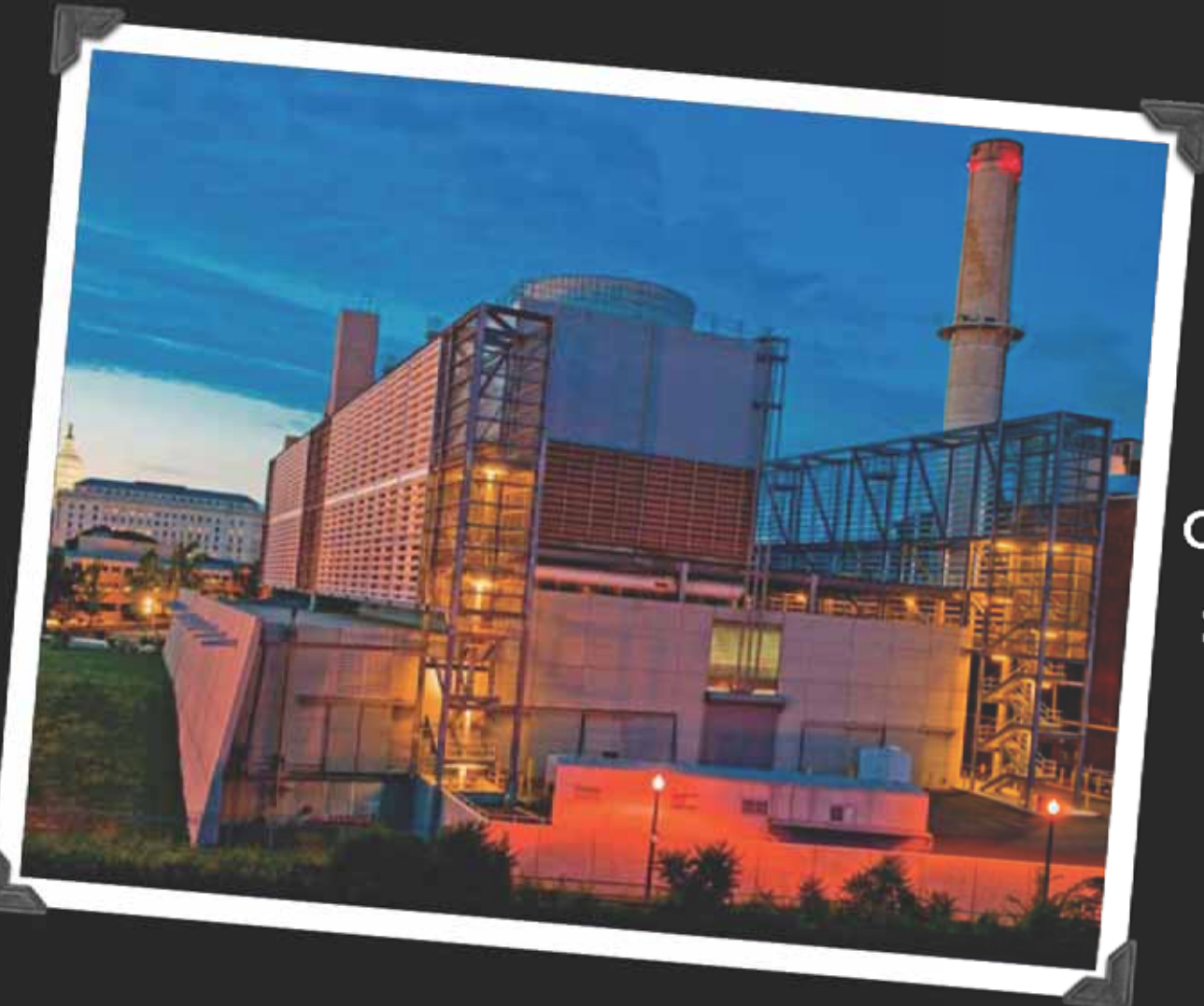
Kennecott Utah Smelter Power Plant

Units 1-3 175 MW Total

Replace with 275 MW
Combined Cycle

Appears to be replacement





US Capitol Power Plant

In 2009 Congress directed the plant to switch from coal to natural gas

After some burner redesign, the plant now burns 88% NG

Planning on adding combined cycle unit

Units 7, 8, 9
190 MW Total
Wall-fired

Completed
transition to 100
MW natural gas
in 2010

Unclear as to
changes made

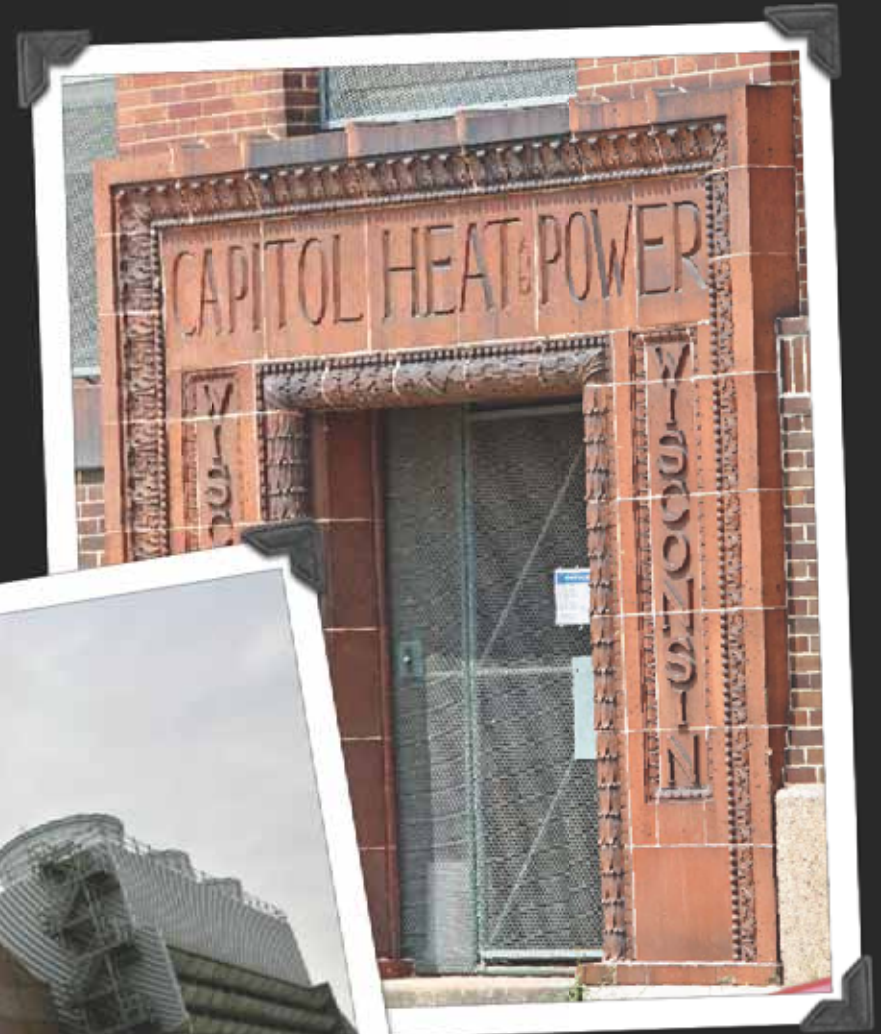
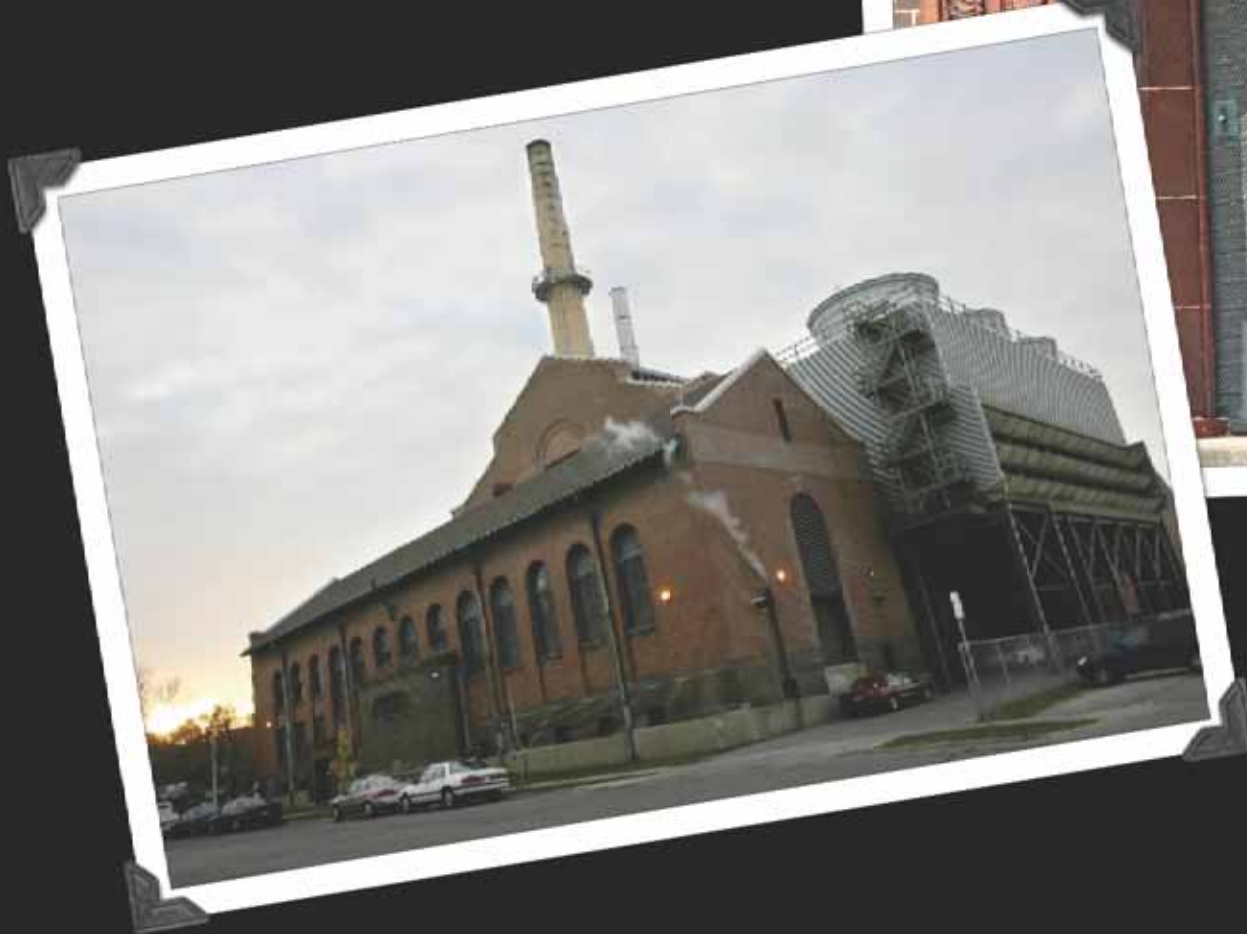


**Madison Gas and Electric
Blount Street Station**

Capitol Heat and Power Madison, Wisconsin

Completed

Appears to be replacement

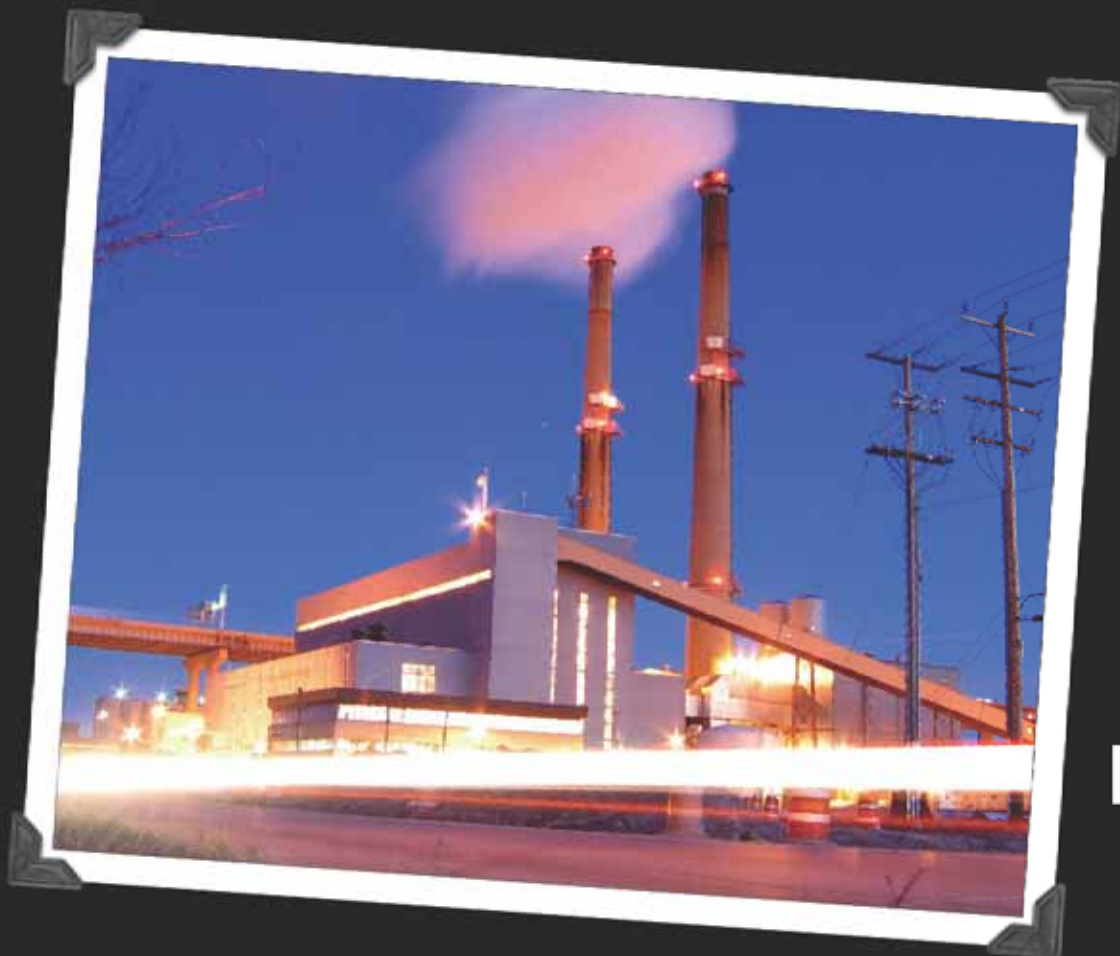


UW Madison Charter Street Heating Plant

Units 1-4

Appears to be replacement



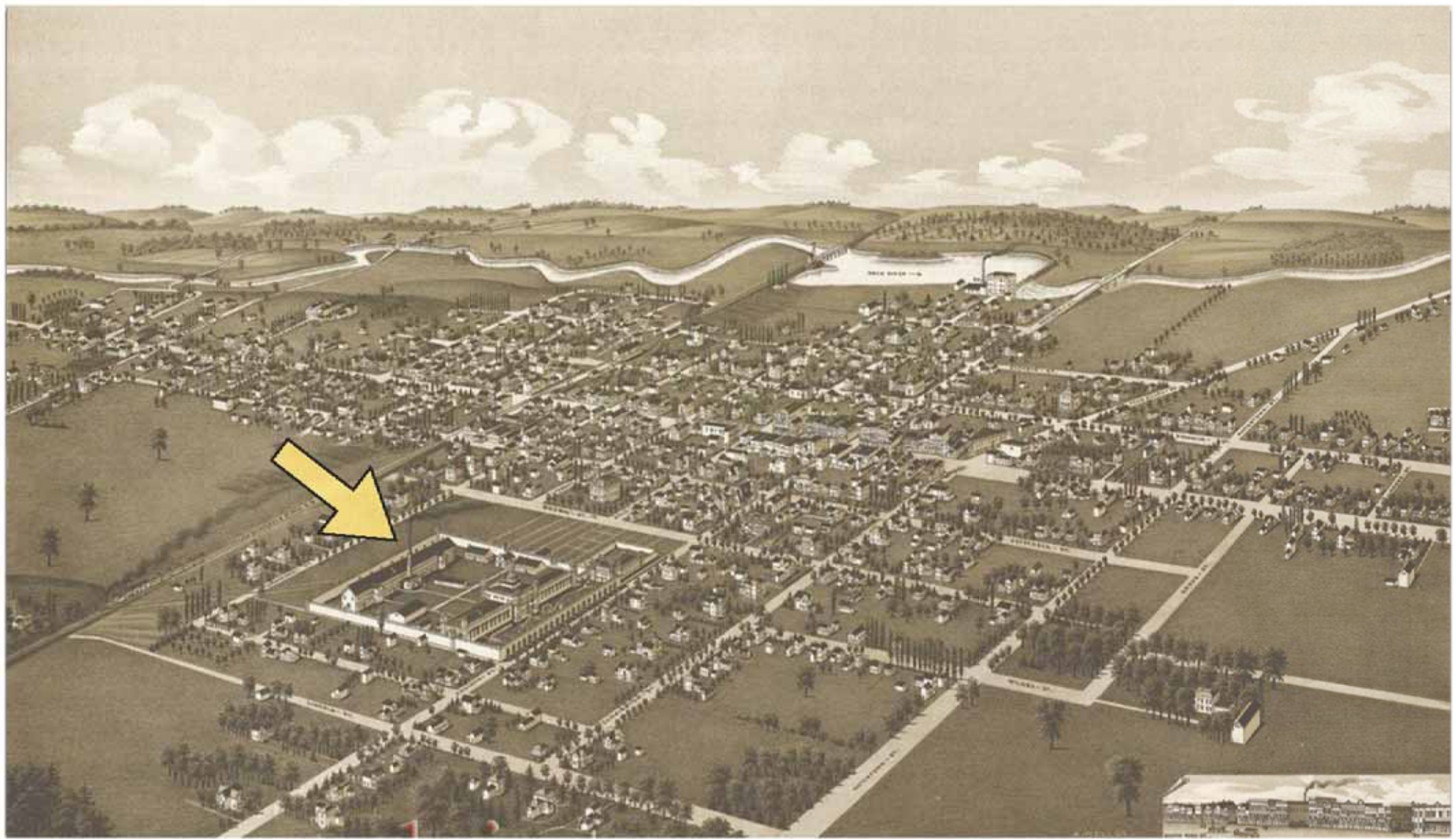


Units 1-4
280 MW Total
Wall-fired

Announced in 2011

Limited details available

We Energies Valley Station



Waupun Correction Central Heating Plant

2 Units
306 MW Total

First unit online
with NG in 2014



Ontario Power
Thunder Bay Generating Station

Taylorville Energy Center



Taylorville Energy Center (TEC) is a proposed 716-megawatt (gross), 602-MW (net) coal-fed power plant using an advanced technology called *Integrated Gasification Combined-Cycle (IGCC)* with *Carbon Capture and Storage (CCS)* to make it among the cleanest power plants in the world.



MATS Impacts

HAPs Covered by MATS

Mercury

Non-mercury metallic HAPs

Acid gas HAPs

Organic HAPs

Performance testing, monitoring, work practices

Filterable PM Monitoring Options

	Initial Compliance	Ongoing Compliance
PM CEMS	30 day CEMS	CEMS w/annual RATA
PM CPMS	stack test	CPMS w/annual stack test
Stack test	stack test	quarterly stack test

Note: If monitoring total or individual HAP metals, quarterly stack testing is required

LEE: Stack test every three years



PM CEMS Example



PM CPMS Example

HCl/HF Monitoring Options

	Initial Compliance	Ongoing Compliance
HCl/HF CEMS	30 day CEMS	CEMS w/annual RATA
Stack test	stack test	quarterly stack test
SO ₂ CEMS ^a	30 day CEMS	CEMS w/annual RATA

^a For units with FGD system only

LEE: Stack test every three years

Mercury Monitoring Options

	Initial Compliance	Ongoing Compliance
Mercury CEMS	30 day CEMS	CEMS w/annual RATA
Sorbent Trap	30 day Sorbent Trap	Sorbent Trap w/annual RATA

LEE: Stack test every year

Organic HAPs Work Practice

	Initial Compliance	Ongoing Compliance
With Neural Net	Tune up	Tune up every 48 months
Without Neural Net	Tune up	Tune up every 36 months

LEE: Not Applicable

LEE Limits

For mercury

<10% of limit

or

<29 lb/yr potential

For non-mercury HAPs

<50% of limit

LEE Limits

Category	Pollutant	Limit	
		lb/mmBtu	lb/MWh
1, 2, 4	Filterable PM	0.015	0.15
1, 2	Non-HAP Metals	0.000025	0.00025
4	Non-HAP Metals	0.0004	0.004
1, 2	HCl	0.001	0.01
4	HCl	0.001	0.005
1, 2	SO ₂	0.1	0.75
1	Hg	0.12 ^a	0.0013 ^b
2	Hg	0.4 ^a	0.004 ^b
4	HF	0.0002	0.002

^a lb/TBtu ^b lb/GWh



Hg Monitoring Costs^a

	Type	EPA Estimate ^b	Reality ^c
Capital Costs	CEMS	\$220,000	\$300-400,000
	Sorbent trap	N/A	\$100-150,000
Ongoing Costs ^d	CEMS	\$77,000	\$50-75,000
	Sorbent trap	N/A	\$20-30,000

^a Costs do not include stack or platform modifications

^b From EPA CEMS Cost Model 03/07/07 w/ 10% inflation adjustment to 2012

^c Vendor information

^d Annual Costs. Without capital recovery

Filterable PM Monitoring Costs^a

	Type	EPA Estimate ^b	Reality ^c
Capital Costs	CEMS	\$190,000	\$200-400,000
	CPMS	\$190,000	\$200-400,000
Ongoing Costs ^d	CEMS	\$40,000	\$40-80,000
	CPMS	\$32,000	\$35-50,000

^a Costs do not include stack or platform modifications. Based on beta-gauge technology

^b From EPA CEMS Cost Model 03/07/07 w/ 10% inflation adjustment to 2012

^c Vendor and user information (rough estimates based on limited data)

^d Annual Costs. Without capital recovery

HCl, HF, SO₂ Monitoring Costs^a

	Type	EPA Estimate ^b	Reality ^c
Capital Costs	CEMS	\$160,000	\$100-200,000
Ongoing Costs ^d	CEMS	\$22,000	\$15-30,000

^a Costs do not include stack or platform modifications. Costs are for a "typical" criteria pollutant and diluent system.

^b From EPA CEMS Cost Model 03/07/07 w/ 10% inflation adjustment to 2012

^c Vendor and user information (rough estimates based on limited data)

^d Annual costs. Without capital recovery

Estimated Stack Test Costs

Test	Approximate Cost
Filterable PM (M5)	\$7,600 - 11,400
HAPs Metals (M29)	\$12,400 - 18,600
HCl/HF (M26, M26A)	\$7,600 - 11,400
HCl (FTIR)	\$15,200 - 23,400
Hg (M30B - 30 days)	\$15,200 - 23,400
PM CEMS RATA (PS I I)	\$18,000 - 26,000
HCl CEMS RATA	\$9,200 - \$13,800

Note: Prices are for individual tests at a single location assuming no delays. Simultaneous testing with multiple methods may reduce overall costs. Actual testing costs will vary from these estimates based on site-specific conditions, variable travel costs, and current market conditions.

Interesting comparison...

Annual cost of quarterly stack tests: ~\$40,000

Annual operating cost of PM CEMS: ~\$40,000

Boiler tune ups estimated at

\$75,000 - 90,000

Every 36-48 months

Permitting Issues



GHG NSPS Proposal

“Although modified sources would not be subject to the 1,000 lb CO₂/MWh standard for new sources, the EPA anticipates that modified sources would become subject to the requirements the EPA would promulgate at the appropriate time, for **existing sources** under 111(d)” (p. 153).



“This is the battleground...”

“The reason we care desperately and have adopted a policy of leaving **no coal plant unopposed** is because each of them is such a massive new source of air pollution and a particularly large source of global warming air pollution.”

Bruce Nilles, Sierra Club
Kansas City Star, April 11, 2006

beyond oil.

BEYOND

COAL



BEYOND



NATURAL GAS

The End?

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