

4/22/05

EPA-R09-OAR-2007-1110-25 (AR 25)

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PROPOSED COAL PLANTS IN THE INTERIOR WEST

BHP Cottonwood - any action from Agency (letter) to terminate application wants us to clarify that new application = new modeling + BACT analysis

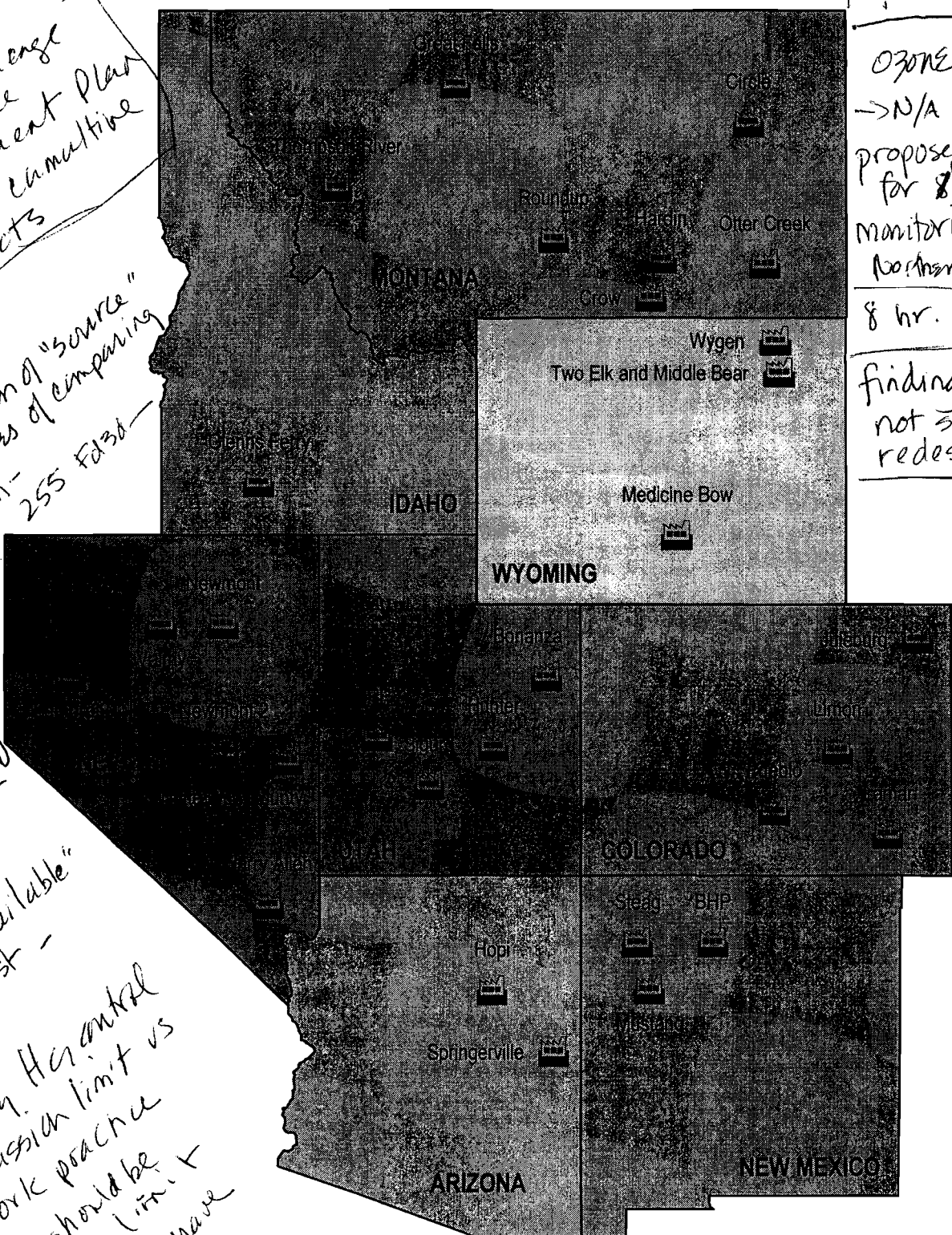
Legal Challenge to Resource Management Plan based on cumulative impacts

MACT -> definition of "source" for purposes of comparing Cement kiln - 255 Fed30

activated Carbon technology

using BACT "available" test -

expressing Hg control as emission limit vs work practice
if MACT -> should be emission limit + BACT - might have more room.



Ozone in Washoe Co -> N/A for 1 hr. proposed attainment for 8 hrs. monitoring data for Northern Washoe 8 hr.

finding of attainment not same as redesignation

IGCC, Mercury limits, NO_x limits, Ozone in Wisconsin (EPA R09-04R-2007-1116-25 (AR 25)), ENV. Justice

IGCC:

- proposed new projects - midwest bituminous coal; some PRB/Petroco blend
- co-production electricity/chemicals (eg methanol, fertilizer)
- GE acquired Chertex; joined Bechtel; ConocoPhillips + Fluor; Shell + Black & Veatch
- AEP, Cinergy, ArcLight
- better financing sources

Wyoming, Idaho proposals

Western issues -

altitude - gas turbines derate ⇒ oxygen production costs higher
 ⇒ economic; Siemens guarantee SO₂F on syngas / Novel Edge membrane technology may reduce O₂ costs

western coal - need more gasifiers for low rank coals to get enough heat blending with Petroco

Illinois - conventional coal plants competing w/ IGCC; IGCC has 1/3 sulfur policy issue - BACT

performance of IGCC - Bituminous coals - Peabody vs Steelhead

cost Minnesota/Excelsior/coproduction facilities/AEP, Cinergy -

reliability - Polk/Wabash = 80% (no spare gasifiers)

proposed new plants next worried about reliability -

Prairie State/Steelhead - Fluor is EPC contractor

George Legal

- Roundup Mt. ← → Montana DEQ said they had included IGCC but rejected it.
- Elmwood - Wisconsin - Administrative Law Judge ignored.

BACT definition - "source" ⇒ "maximum degree of reduction"

top-down steps: identify all control options: 1990 draft Manual

70 FR 9706 NSPS for Power Plants.

NO_x emissions limits.

Desert Rock - environmental justice issues

Black Mesa case - Hopi (aquifer depletion)

Desert Rock - Navajo Nation is joint partner; public participation - scoping for ~~NEPA~~ NEPA did not have local meetings

⇒ need better monitoring for communities; Navajo chapters - local gov. ⇒ consultation obligations

⇒ chapters have passed resolutions opposing DR

Four Corners power plant - "The Navajo Hour"

chapters - Bernam, Sinasti, Two Gray Hills

30 Day Average NOx Emission Rates for Coal-Fired Power Plant Units With SCR Retrofits During 3rd

Plant Name	State	Size	Type of Coal Burned	Average 30 day average NOx rate, lb/MMBtu	Highest 30 day NOx rate, lb/MMBtu	Lowest 30 day NOx rate, lb/MMBtu
WA Parish 5	TX	734	Subbit	0.03	0.03	0.03
WA Parish 6	TX	734	Subbit	0.03	0.03	0.03
WA Parish 7	TX	615	Subbit	0.03	0.03	0.03
WA Parish 8	TX	615	Subbit	0.03	0.03	0.03
Trimble Unit 1	KY	566	Bit	0.03	0.04	0.03
Montour Unit 1	PA	806	Bit	0.04	0.05	0.04
Montour Unit 2	PA	819	Bit	0.04	0.06	0.04
Pleasants Power Unit 1	WV	684	Bit	0.04	0.06	0.03
Mill Creek Unit 4	KY	544	Bit	0.04	0.05	0.03
Dan E Karn Unit 2	MI	265	Bit	0.04	0.04	0.03
Colbert Unit 5	AL	550	Bit	0.04	0.05	0.04
Mountaineer	WVA	1300	Bit	0.05	0.06	0.05
Pleasants Power Unit 2	WV	684	Bit	0.05	0.07	0.04
Gavin Unit 1	OH	1300	Bit	0.06	0.07	0.06
Gavin Unit 2	OH	1300	Bit	0.06	0.07	0.06
James H Miller Unit 3	AL	705	Bit	0.06	0.06	0.06
James H Miller Unit 4	AL	705	Bit	0.06	0.06	0.06
Keystone Unit 2	PA	936	Bit	0.07	0.09	0.03
Dan E Karn Unit 1	MI	265	Bit	0.08	0.12	0.05

Notes:

30 Day Average Data Calculated from Acid Rain/OTC Hourly Emissions Data available at <http://www.epa.gov/airmarkets/emissions/raw/index.html> for 3rd quarter 2004 (July - September 2004).
Size and type of coal burn from EGRID.