# Attachment A
(Case Studies)

to

Air Enforcement Division's Comments on the Draft New Source Review Clean Air Interstate Rule
(August 24, 2005 draft)
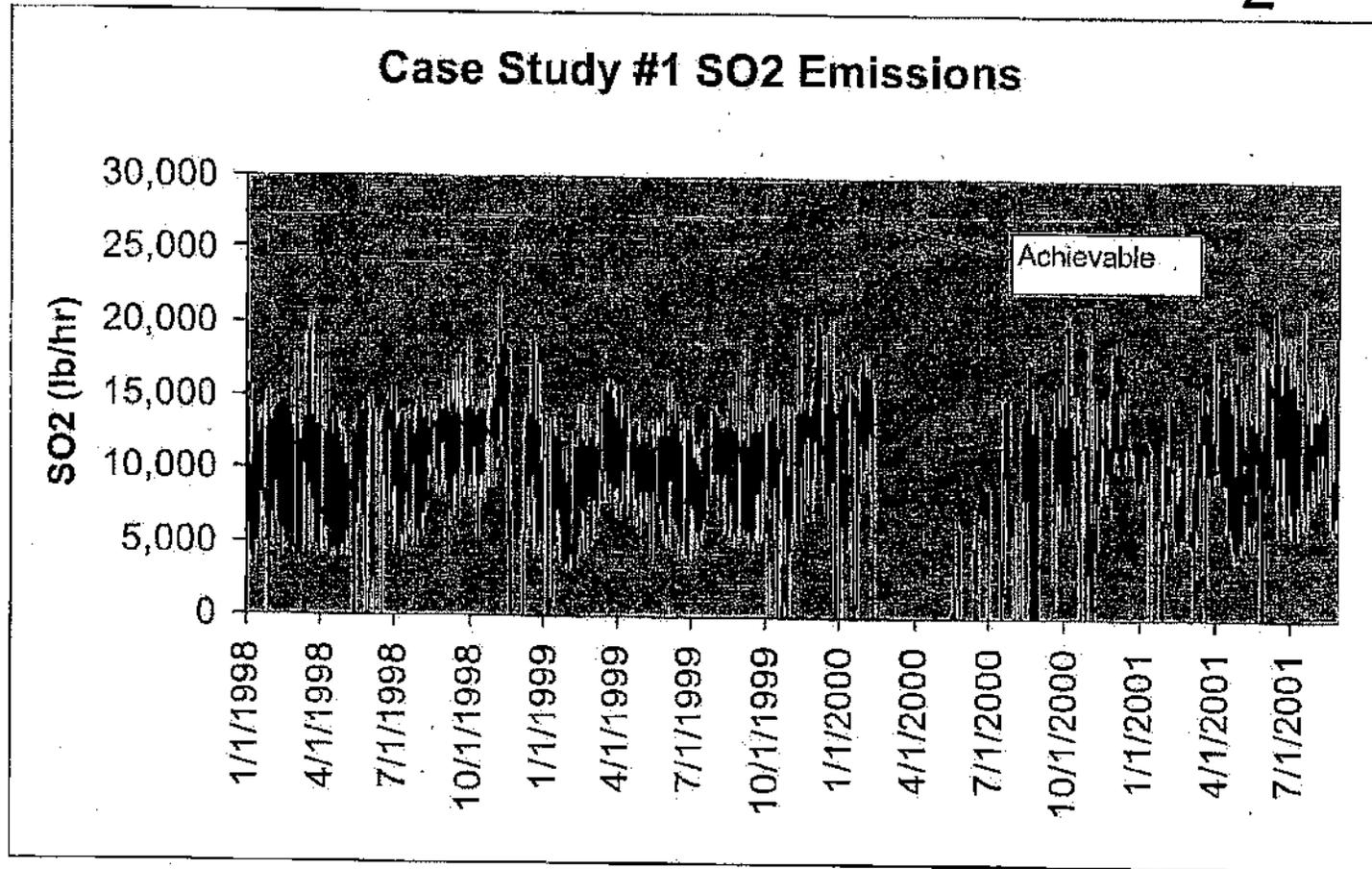
August 30, 2005

Case Study #1

- 1,080 MW Unit.

- 2000 project -- redesign and replace economizer (increased surface area), replaced the horizontal reheater with upgraded material; and, replaced steam path.

- SO_2 emissions increased by 13,096 tons/year.

Was there an increase capacity?

Case Study #1 Heat Rate
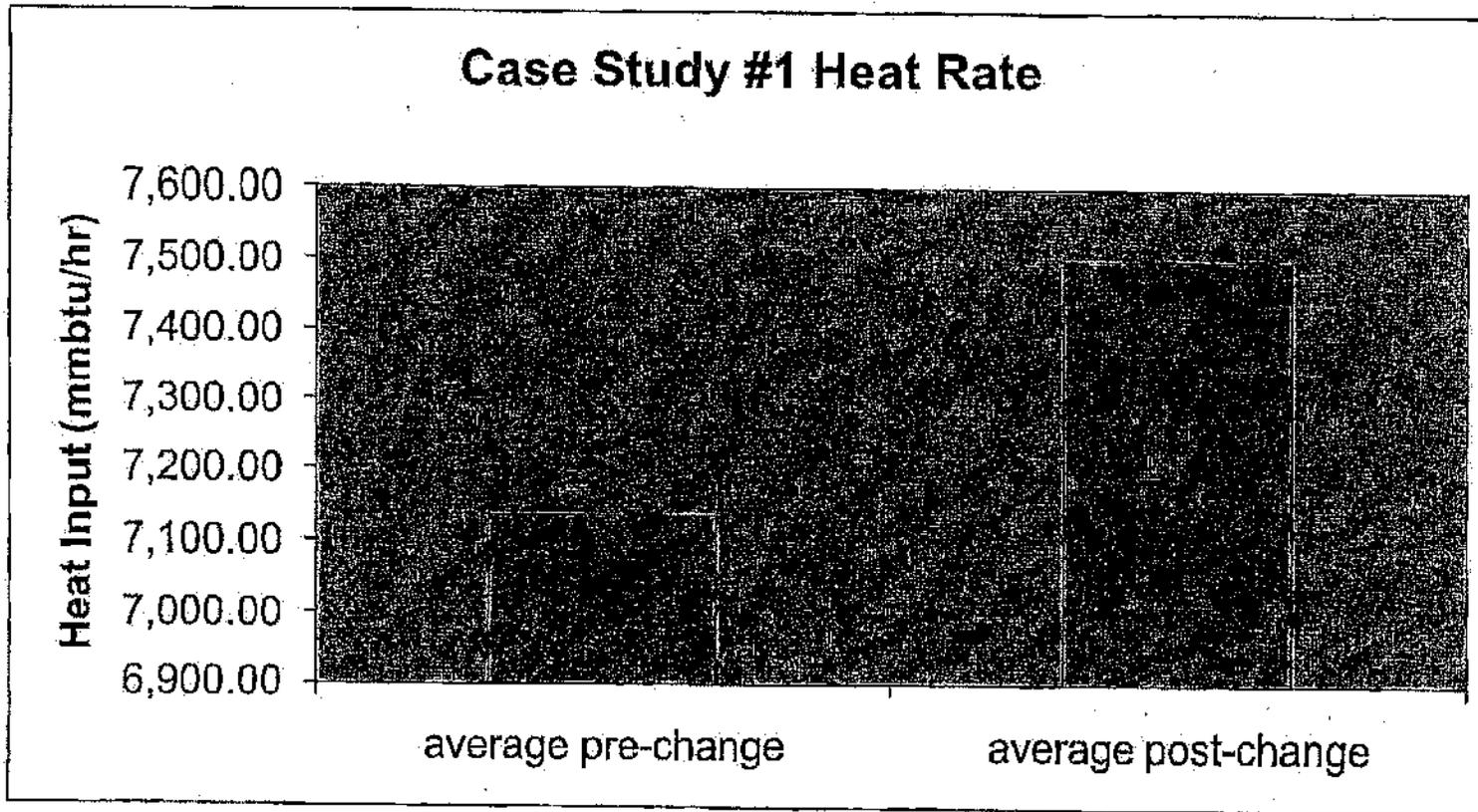
Average Heat Input = Average hourly heat input available data from EPA
Clean Air Markets Division (post 1994).

Maximum Achievable – SO_2

Case Study #1 SO2 Emissions
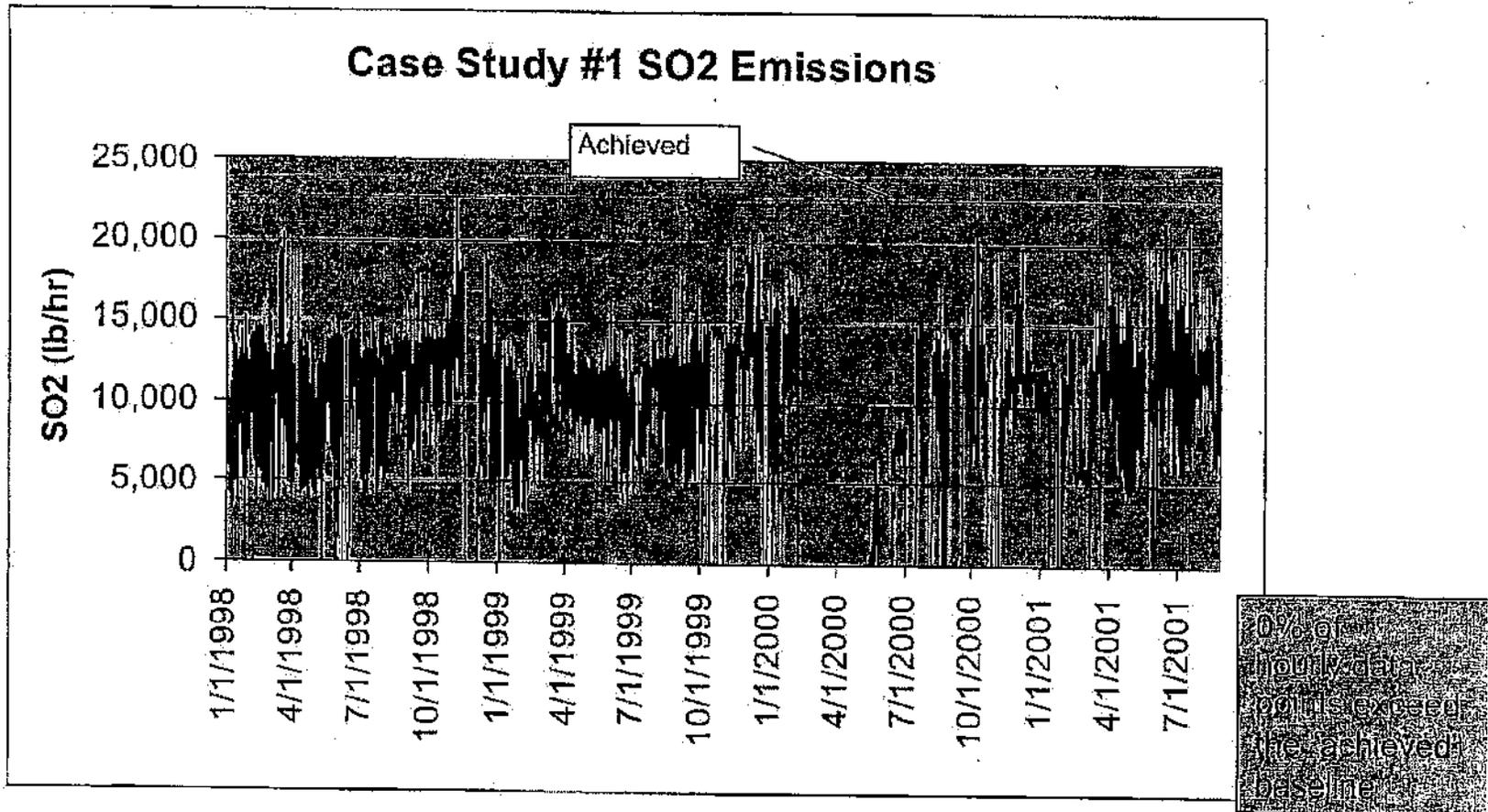

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

All data (post-1994) was obtained from EPA's Clean Air Markets Division as reported.
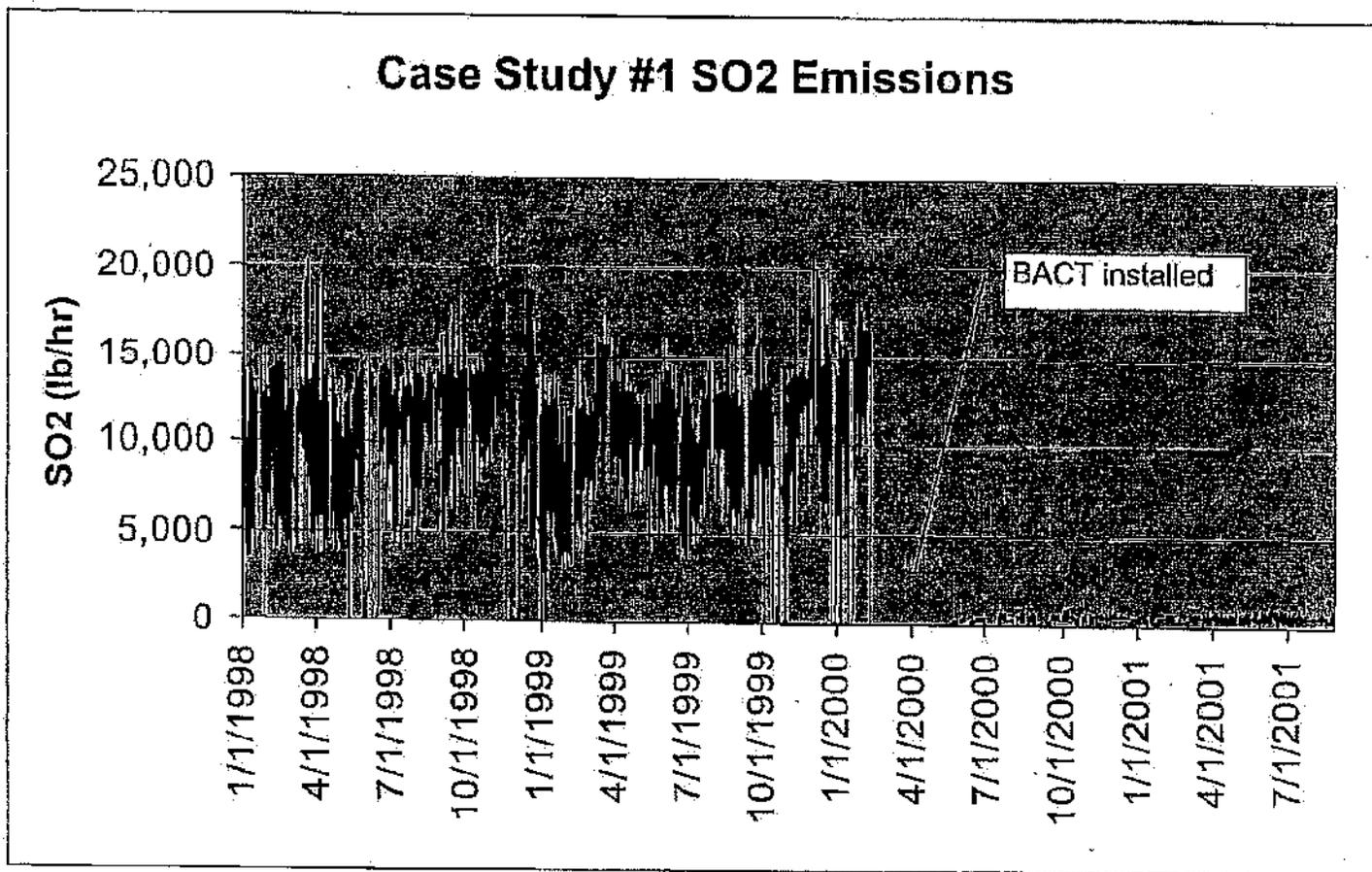
Maximum Achieved – SO$_2$

Case Study #1 SO2 Emissions

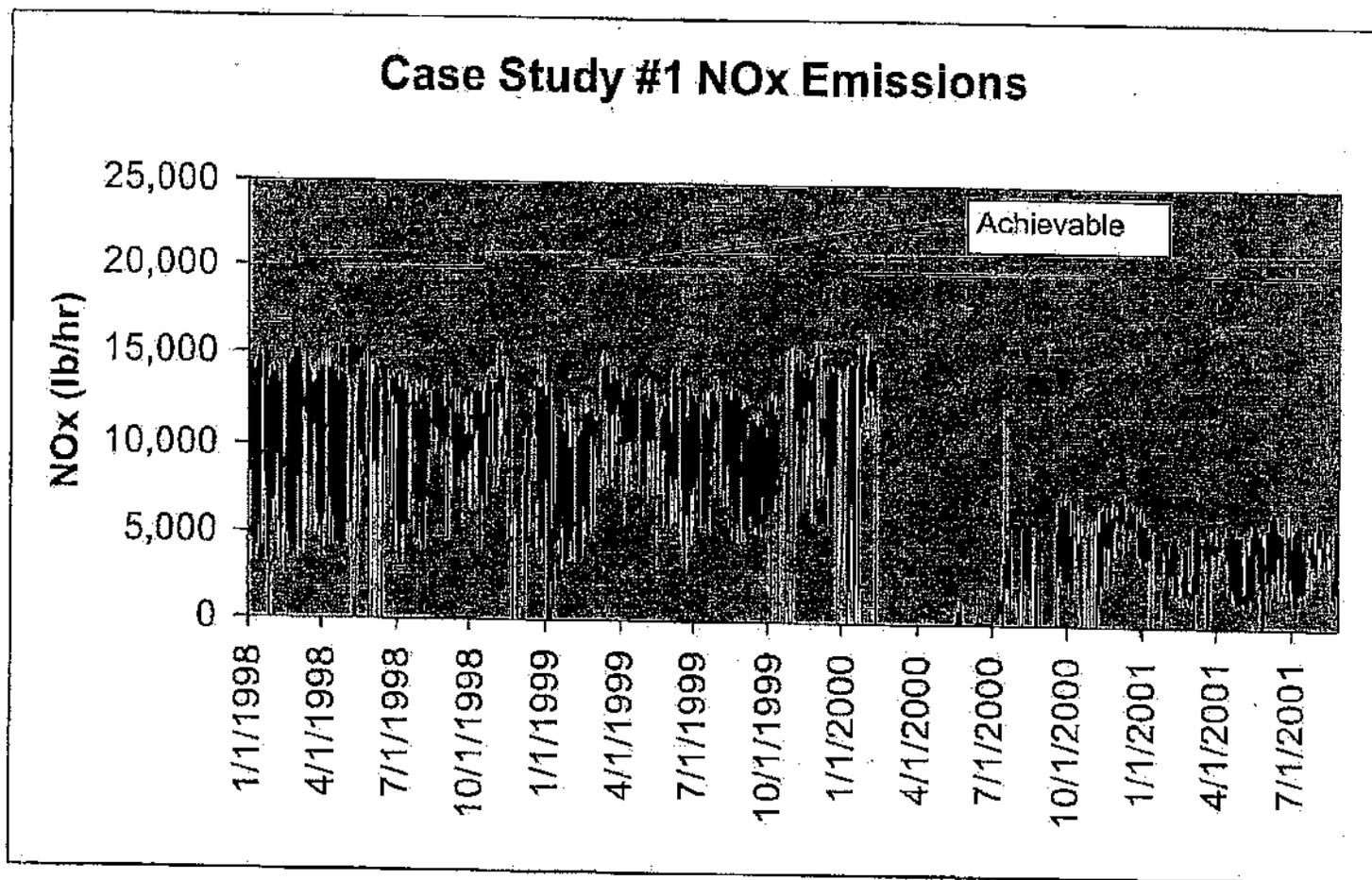Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if SO$_2$ controls were installed?

Case Study #1 SO2 Emissions

SO$_2$ BACT assumed 95% emission reductions

Maximum Achievable - NO$_X$

Case Study #1 NOx Emissions
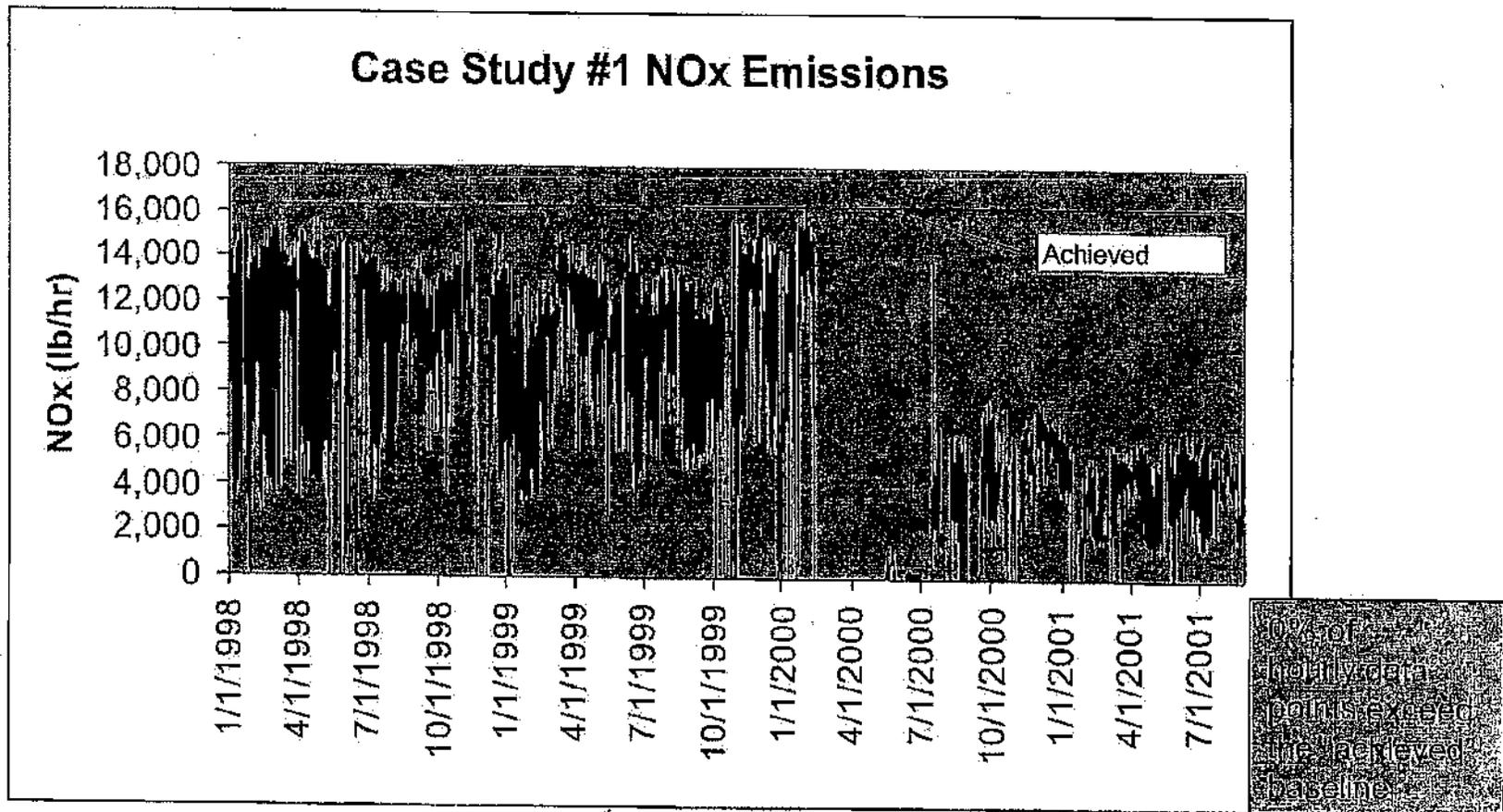
Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

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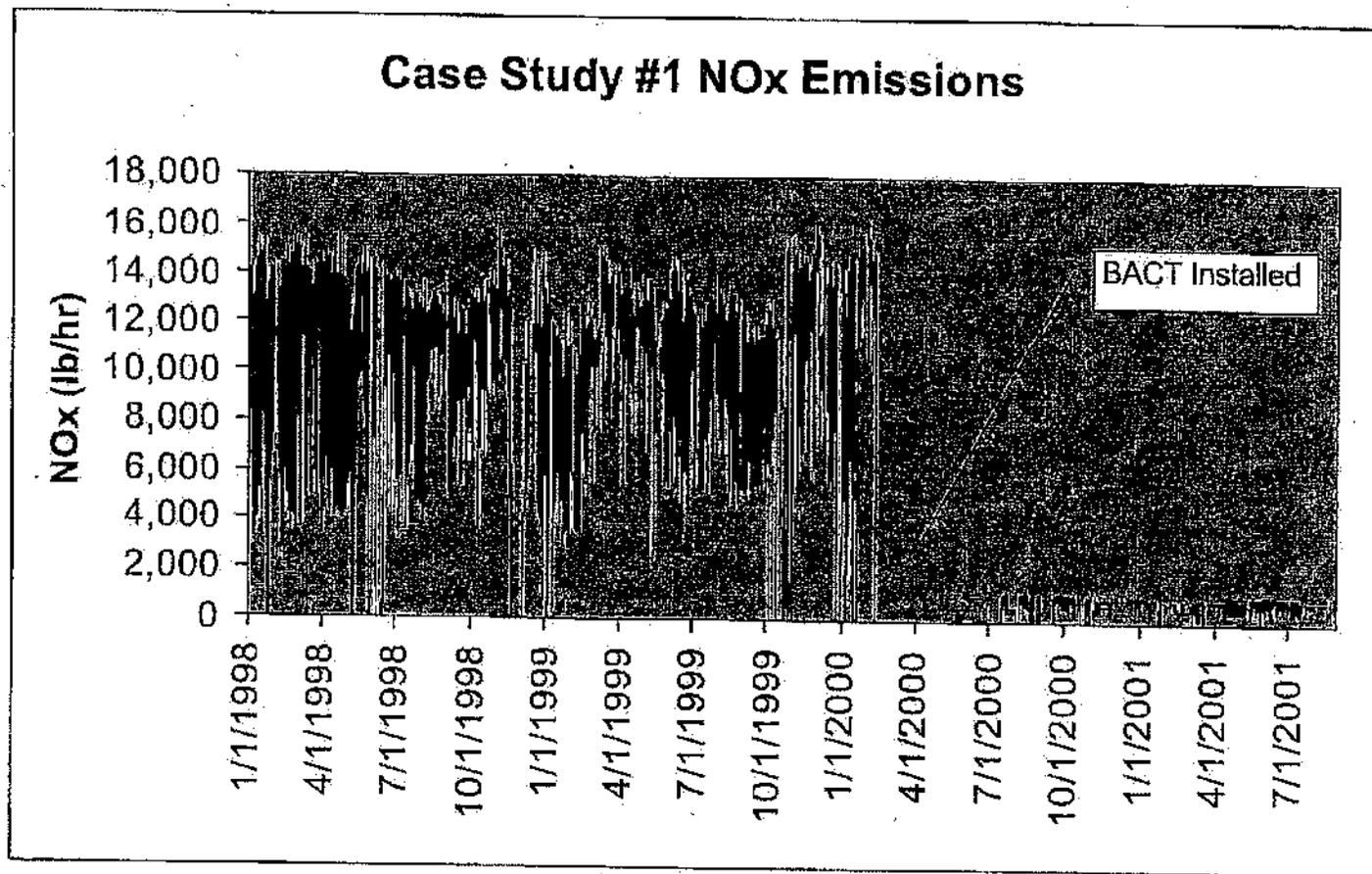
Maximum Achieved - NO_x

Case Study #1 NOx Emissions

Achieved

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if NO$_X$ controls were installed?

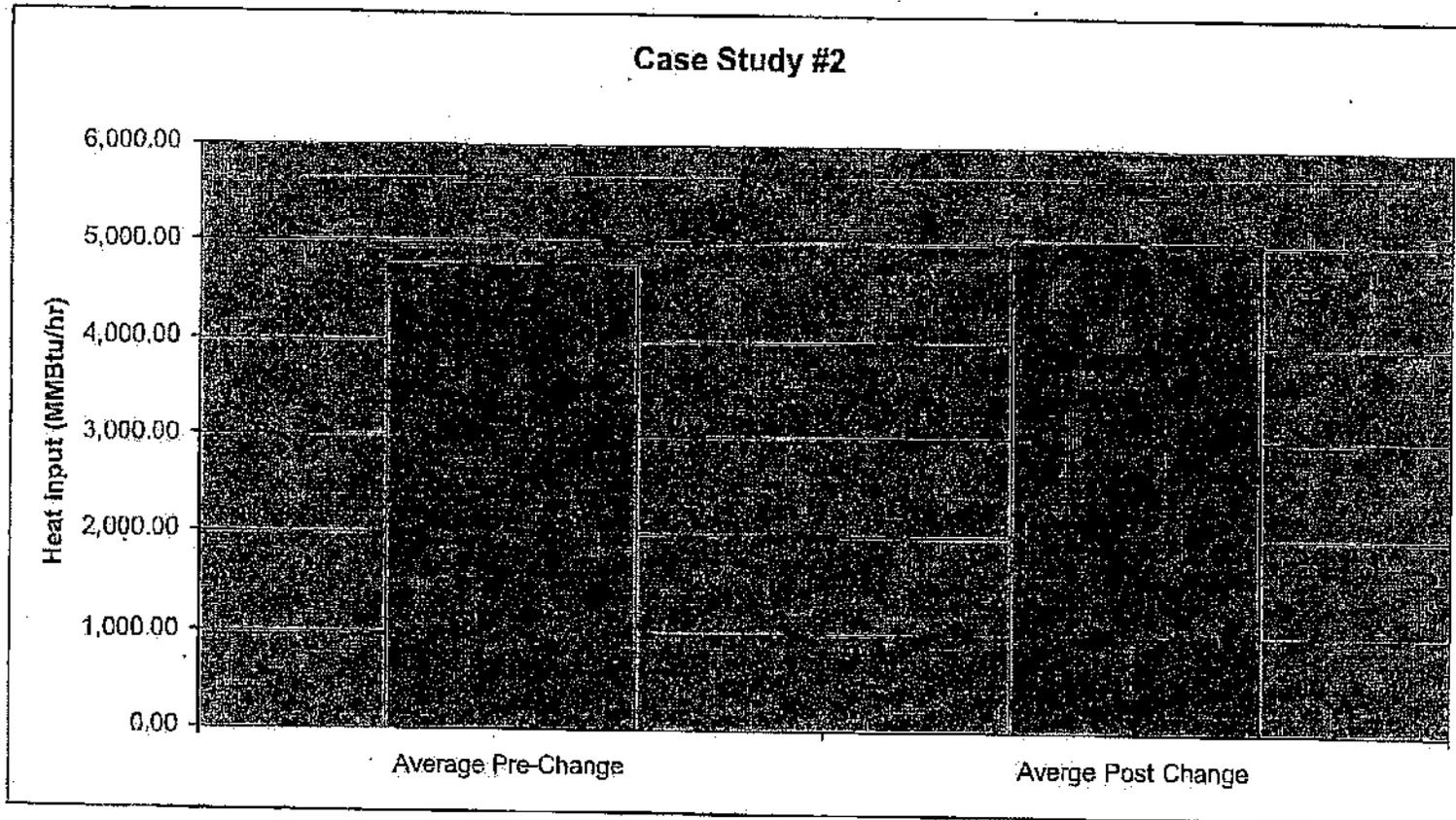## Case Study #1 NOx Emissions
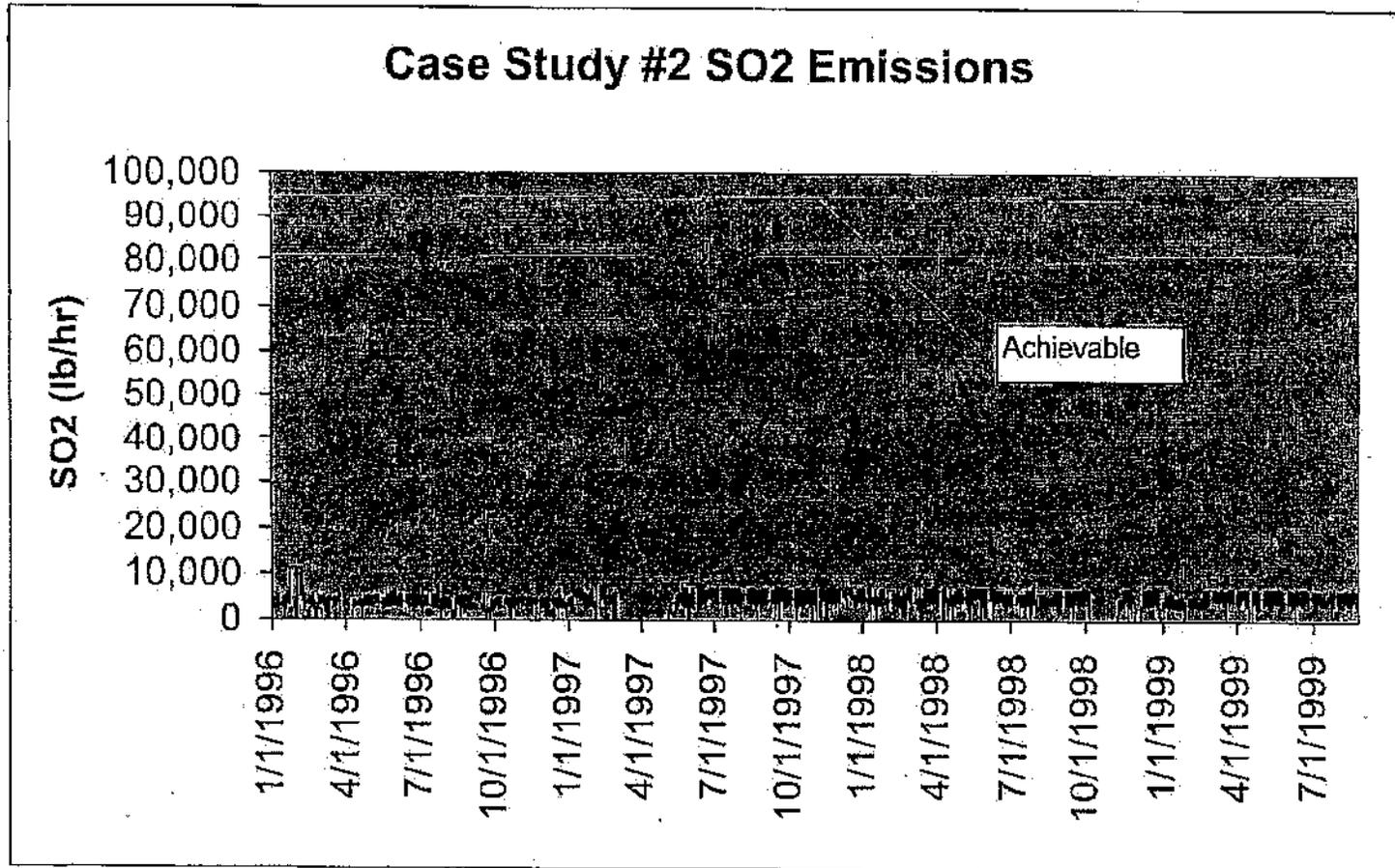

NO$_X$ BACT assumed 0.100 lb/mmbtu

Case Study #2

- 638 MW Unit.

- 1998 project -- redesign and replacement of reheater resulting in 10% increase in capacity of the unit.

- SO_2 and NO_X increased by 50 and 978 tons/year, respectively.

Was there an increase capacity?

Case Study #2

Heat Input (MMBtu/hr)

Average Pre-Change	Averge Post Change

?Average Heat Input = Average hourly heat input data available from EPA Clean Air Markets Division (post 1994).

Maximum Achievable – SO$_2$

Case Study #2 SO2 Emissions
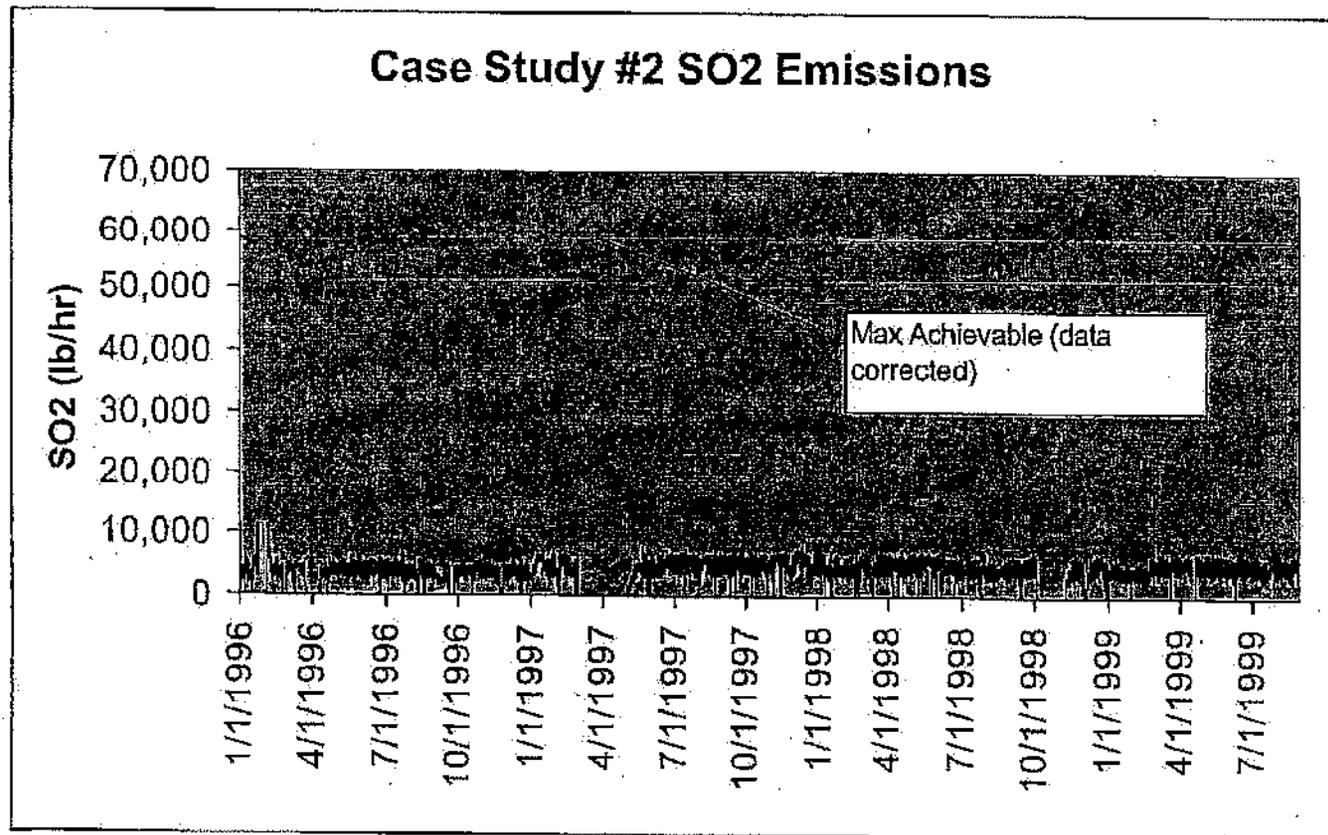

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achievable (Corrected) – SO$_2$
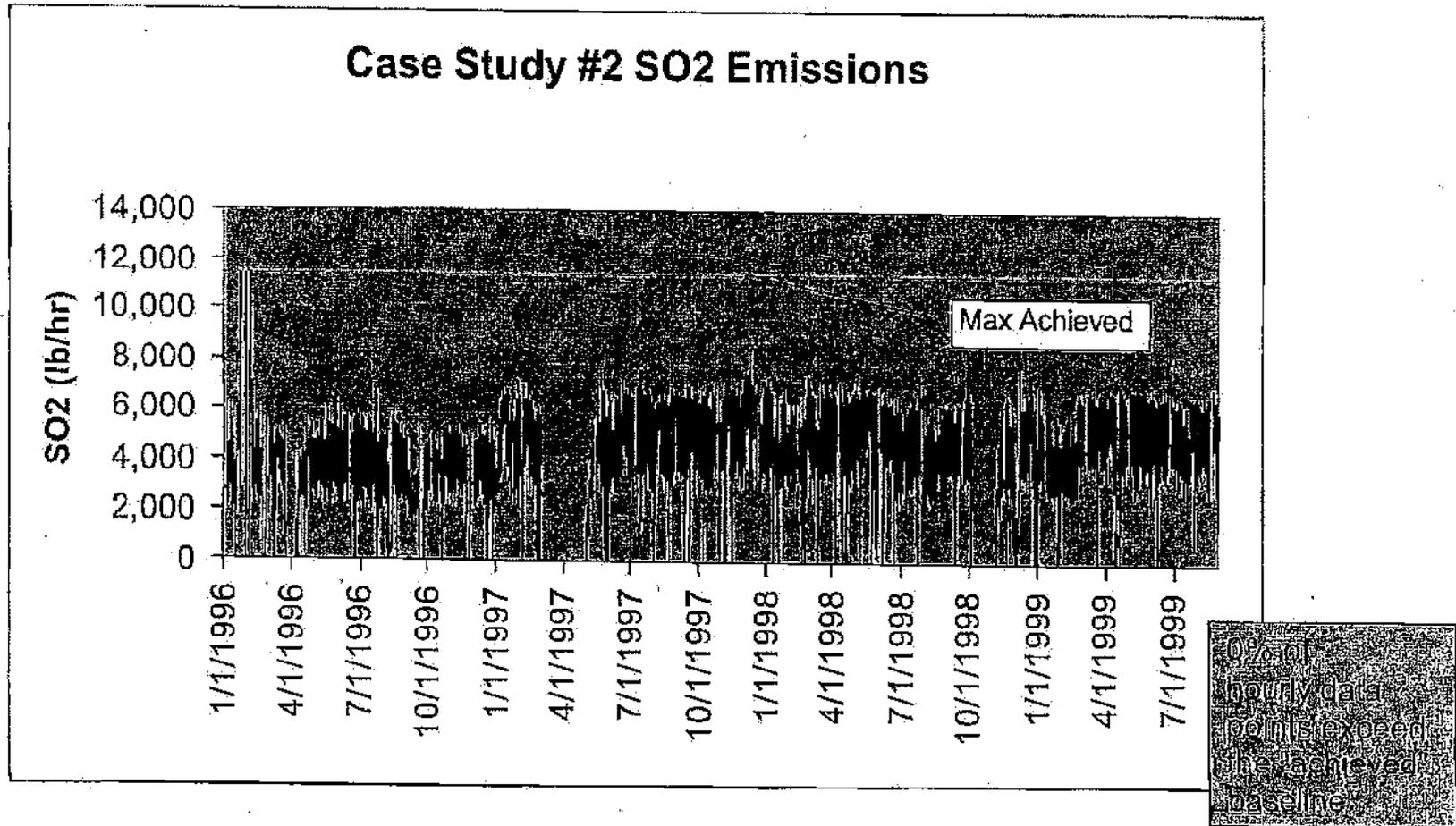
Case Study #2 SO2 Emissions

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

Achievable baseline is corrected to eliminate 0.1% of outlying data points in the heat rate. Note: Proposed rule does not allow for data correction.

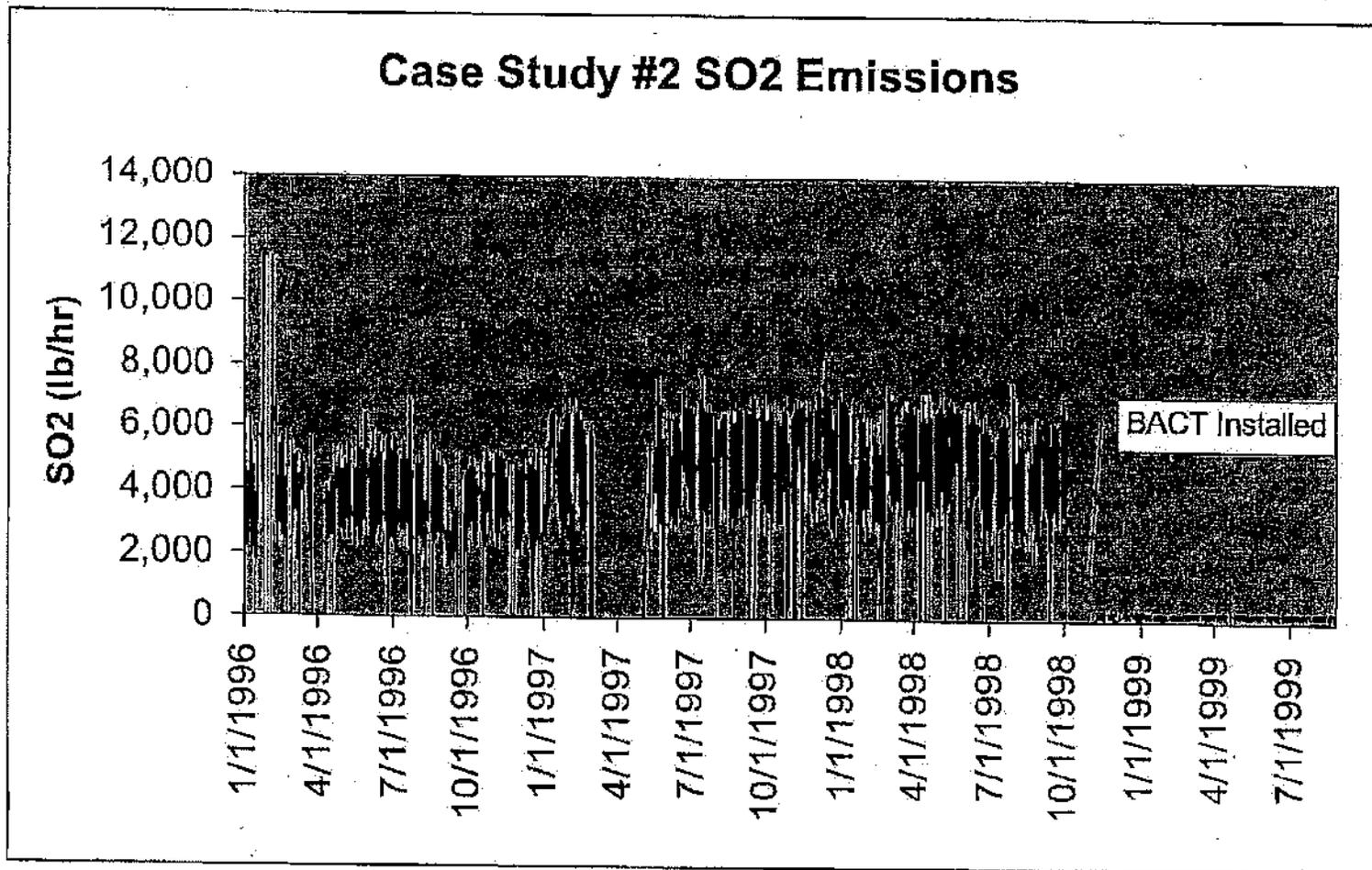All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achieved – SO$_2$

Case Study #2 SO2 Emissions

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

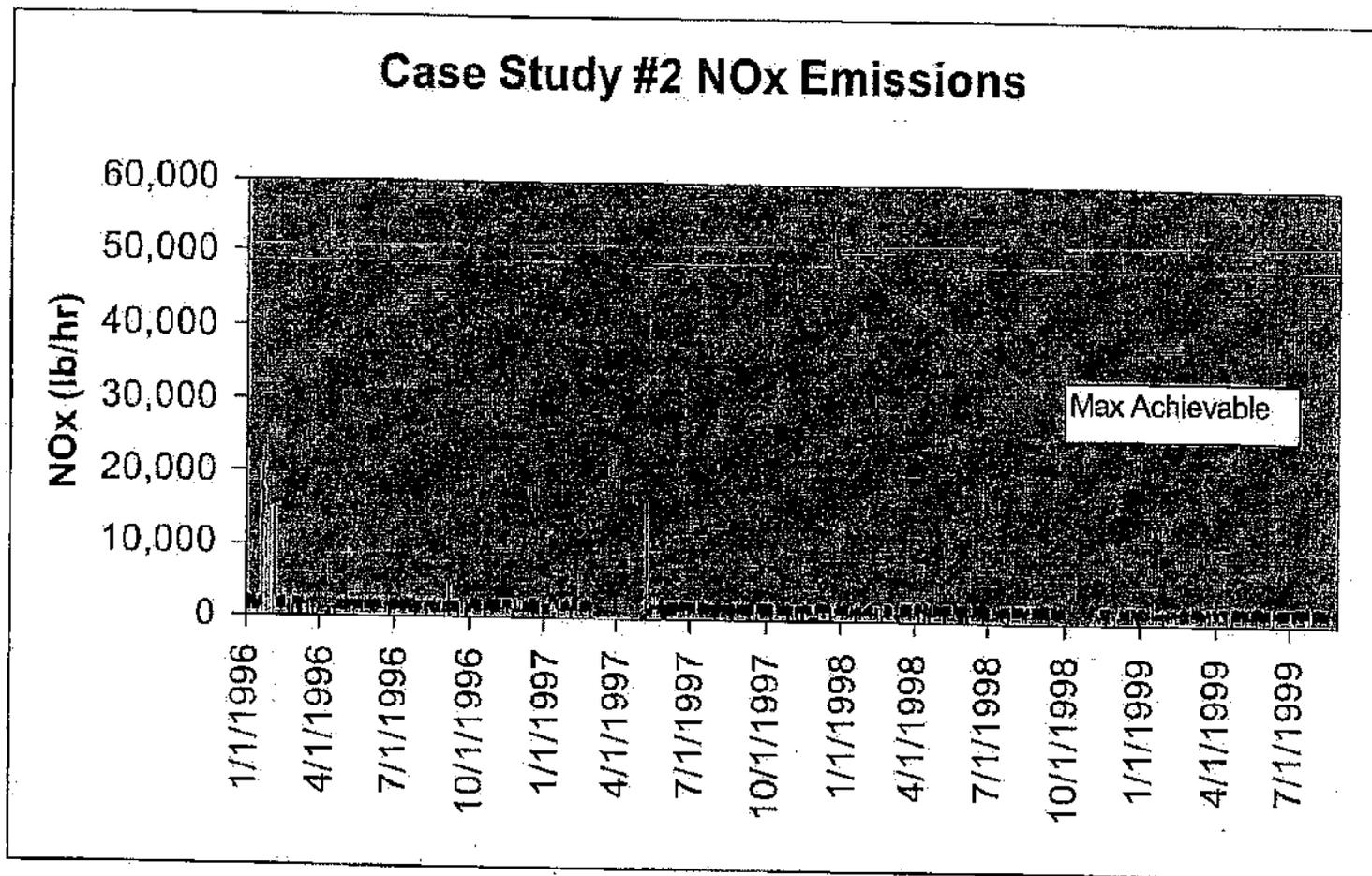All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if SO$_2$ controls were installed?

Case Study #2 SO2 Emissions

SO$_2$ BACT assumed 95% emission reductions

Maximum Achievable - NO_X

Case Study #2 NOx Emissions

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achievable (Corrected) – NO$_X$

Case Study #2 NOx Emissions
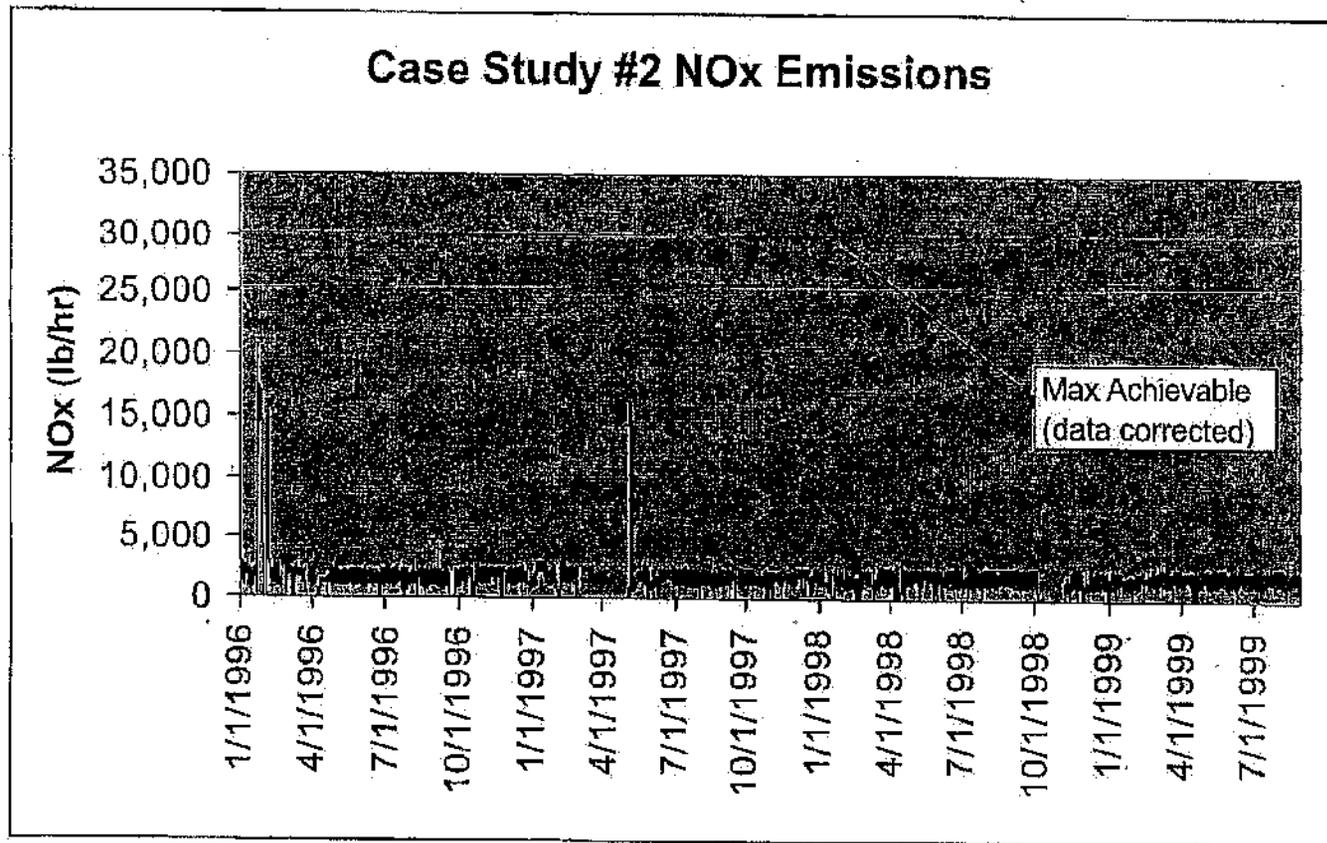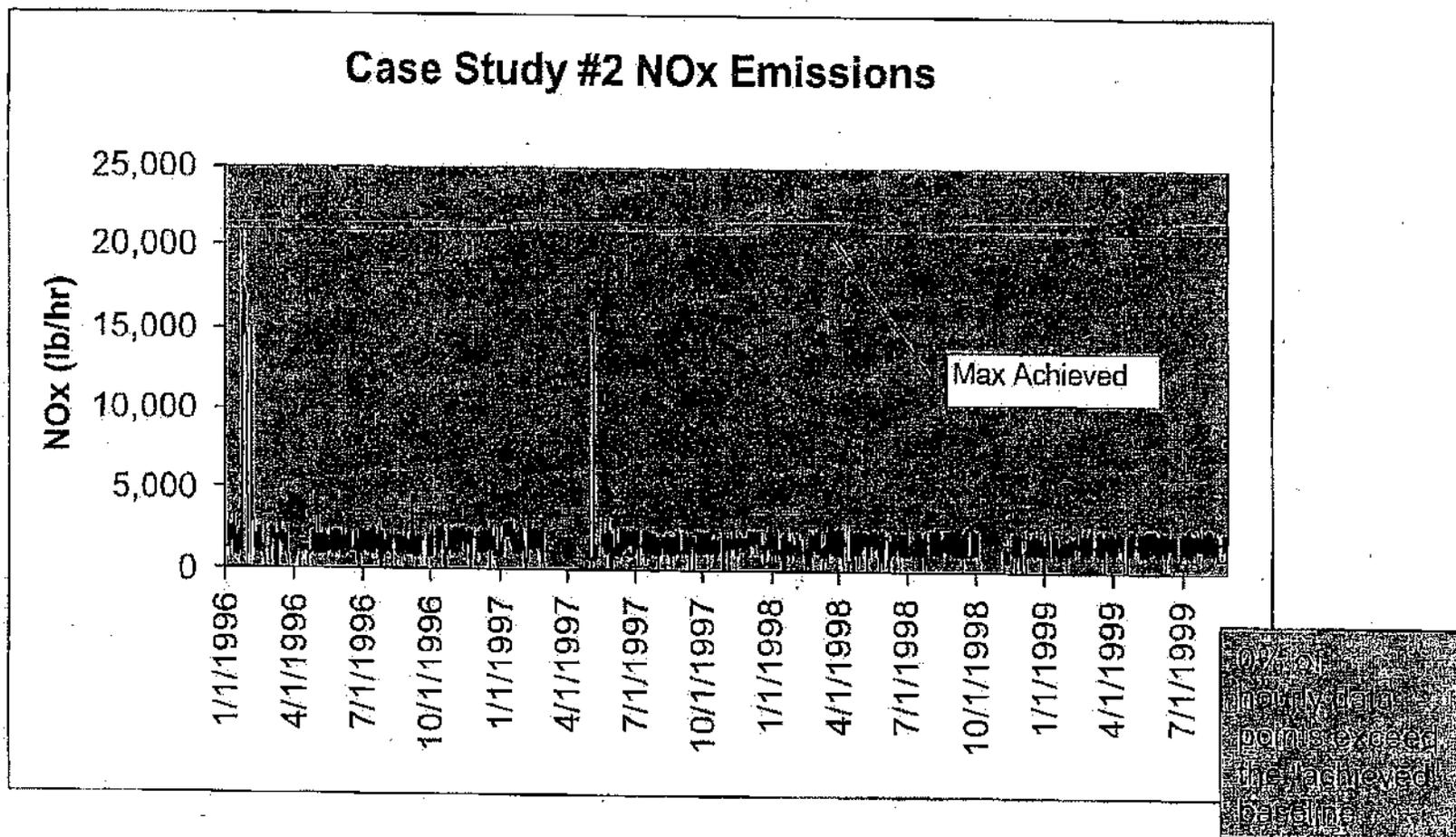
Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

Achievable baseline is corrected to eliminate 0.1% of outlying data points in the heat rate. Note: Proposed rule does not allow for data correction.

All data (post-1994) was obtained from EPA's Clean Air Markets Division.
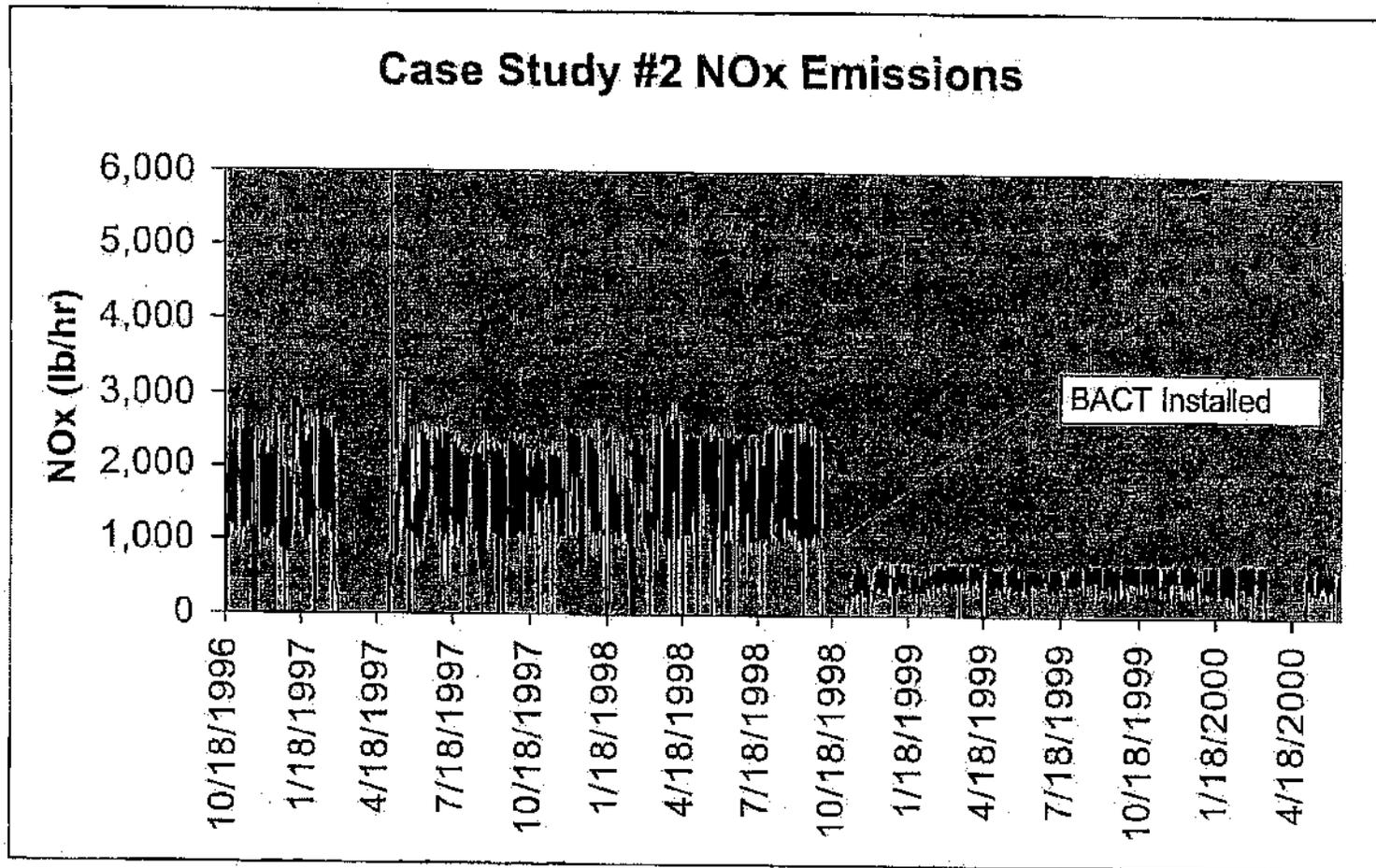
Maximum Achieved - NO$_X$

Case Study #2 NOx Emissions

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if NO$_X$ controls were installed?
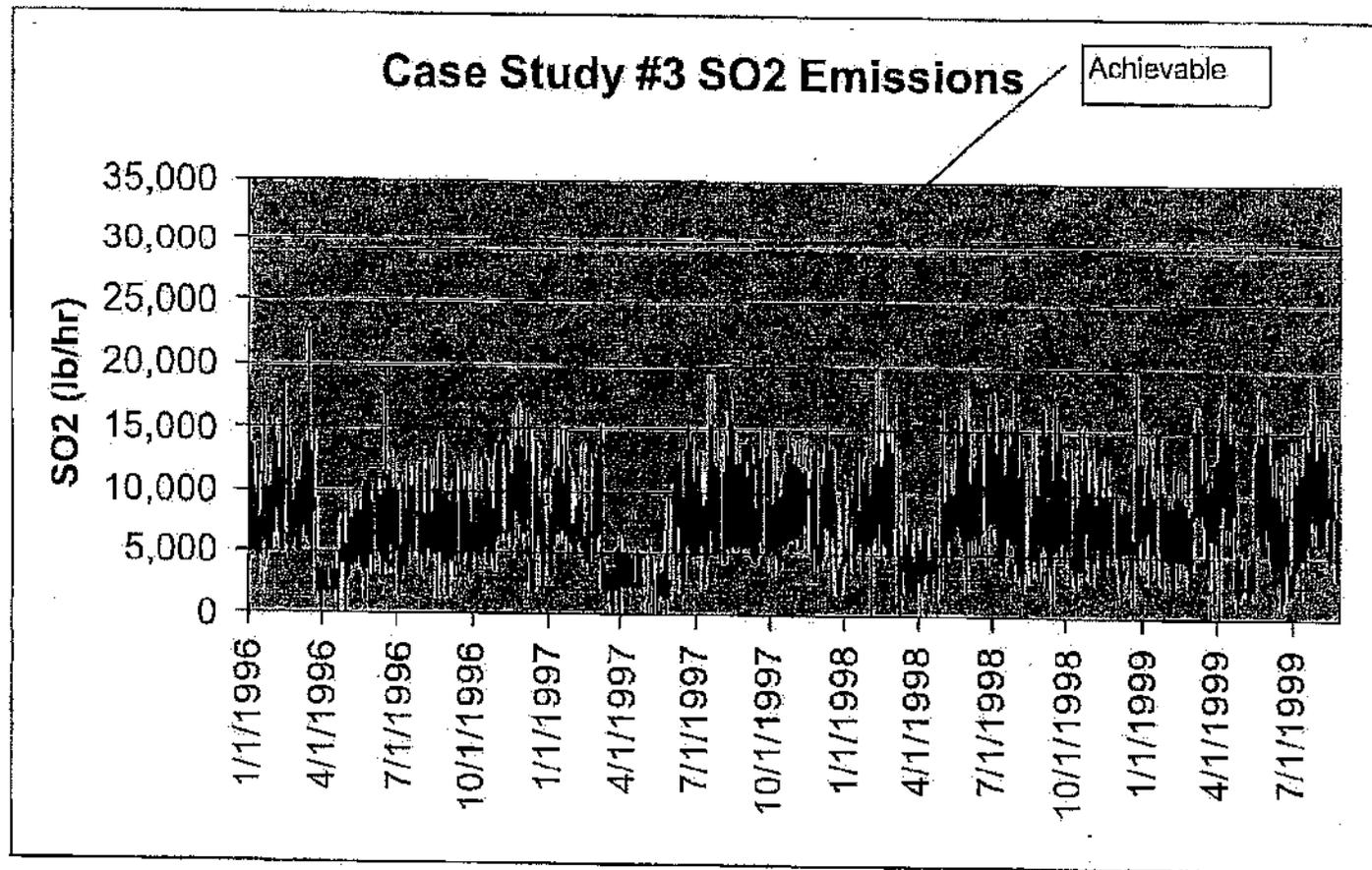

Case Study #2 NOx Emissions

NO$_X$ BACT assumed 0.100 lb/mmbtu

Case Study #3

- 446 MW Unit.

- 1997 -- new, higher capacity turbines; new design reheater with 8% greater surface area; rear arch waterwall replacement; and, pulverizer upgrades.

- Capacity increase of 46 MW (Unit 3 previously rated at 400 MW).

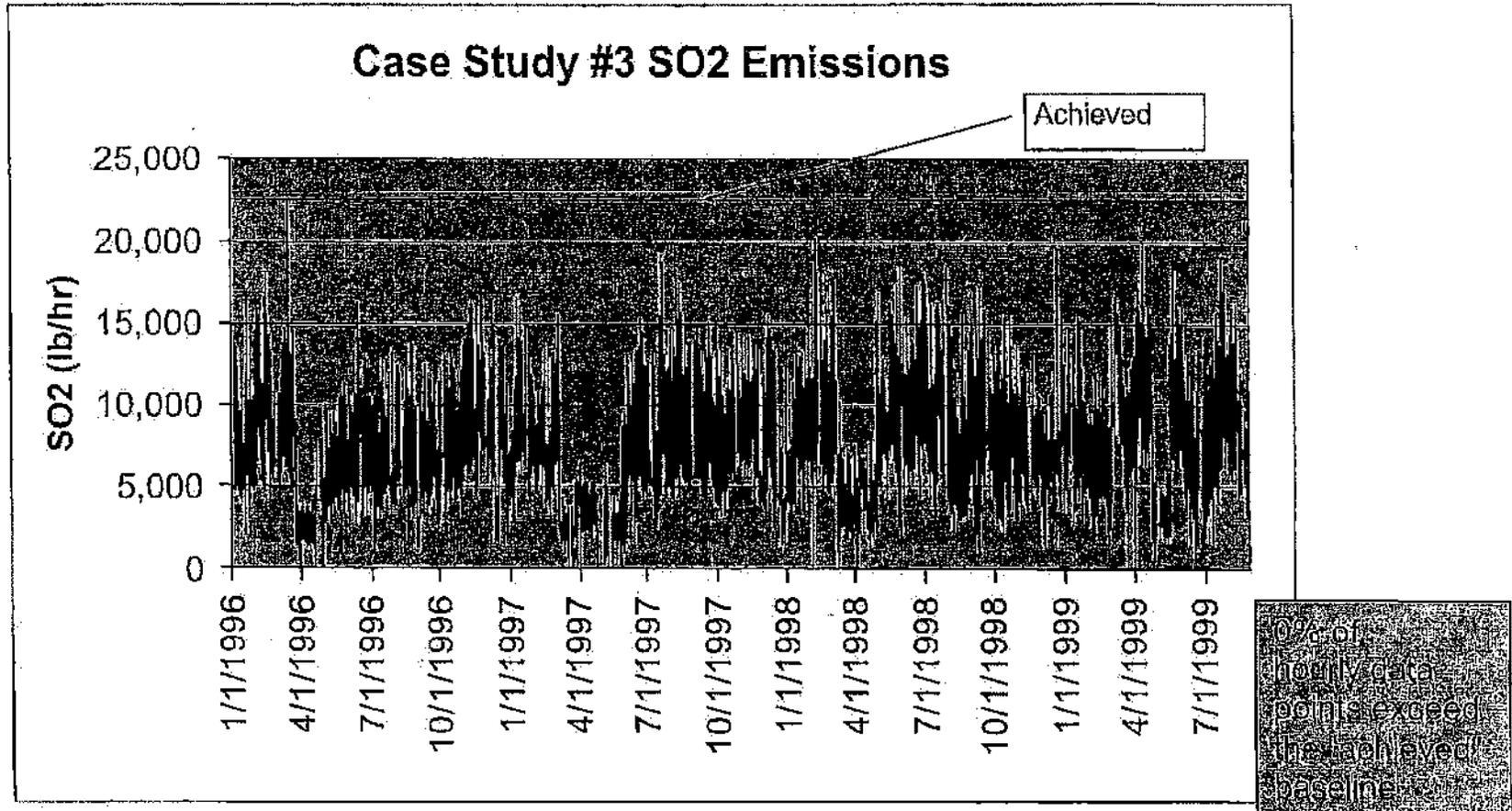- SO_2 and NO_X increased by 939 and 1,405 tons/year, respectively.

Maximum Achievable Test - SO$_2$

Case Study #3 SO2 Emissions

Achievable

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achieved Test - SO$_2$

Case Study #3 SO2 Emissions

Achieved

SO2 (lb/hr)

25,000
20,000
15,000
10,000
5,000
0

1/1/1996 · 4/1/1996 · 7/1/1996 · 10/1/1996 · 1/1/1997 · 4/1/1997 · 7/1/1997 · 10/1/1997 · 1/1/1998 · 4/1/1998 · 7/1/1998 · 10/1/1998 · 1/1/1999 · 4/1/1999 · 7/1/1999

0% of hourly data points exceed the achieved baseline

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if SO$_2$ controls were installed?

Case Study #3 SO2 Emissions

SO$_2$ BACT assumed 95% emission reductions

Maximum Achievable Test - NO$_x$

Case Study #3 NOx Emissions

Achievable

Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

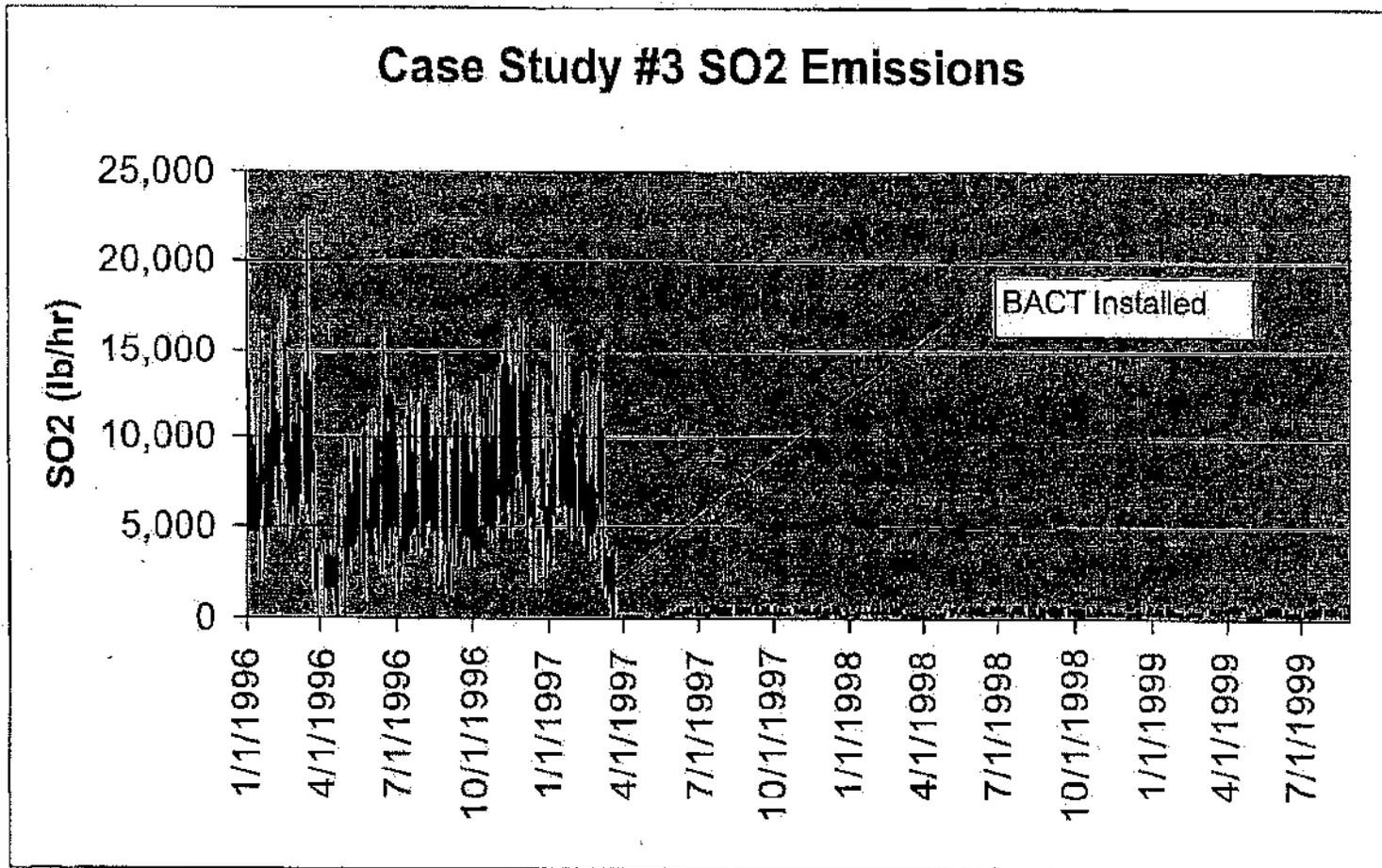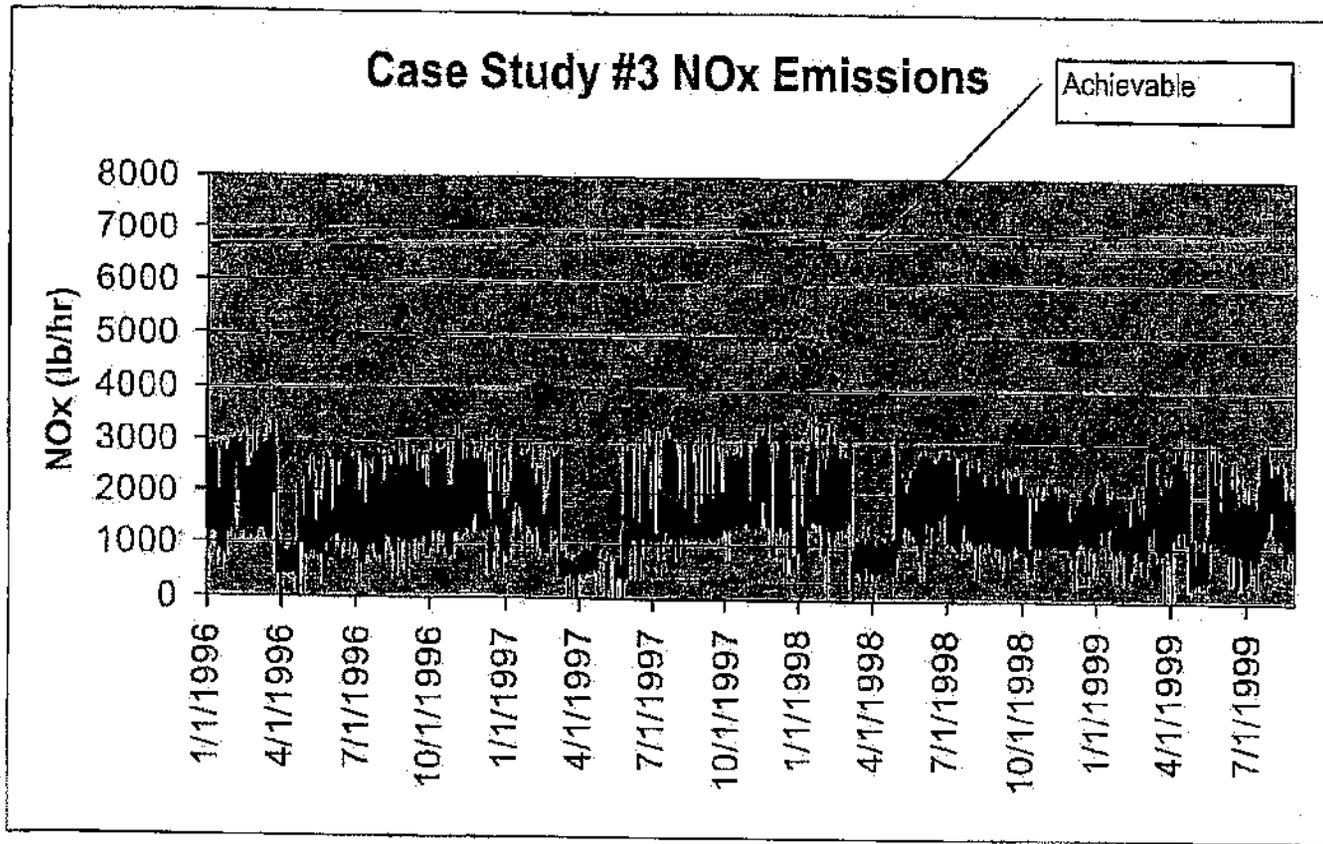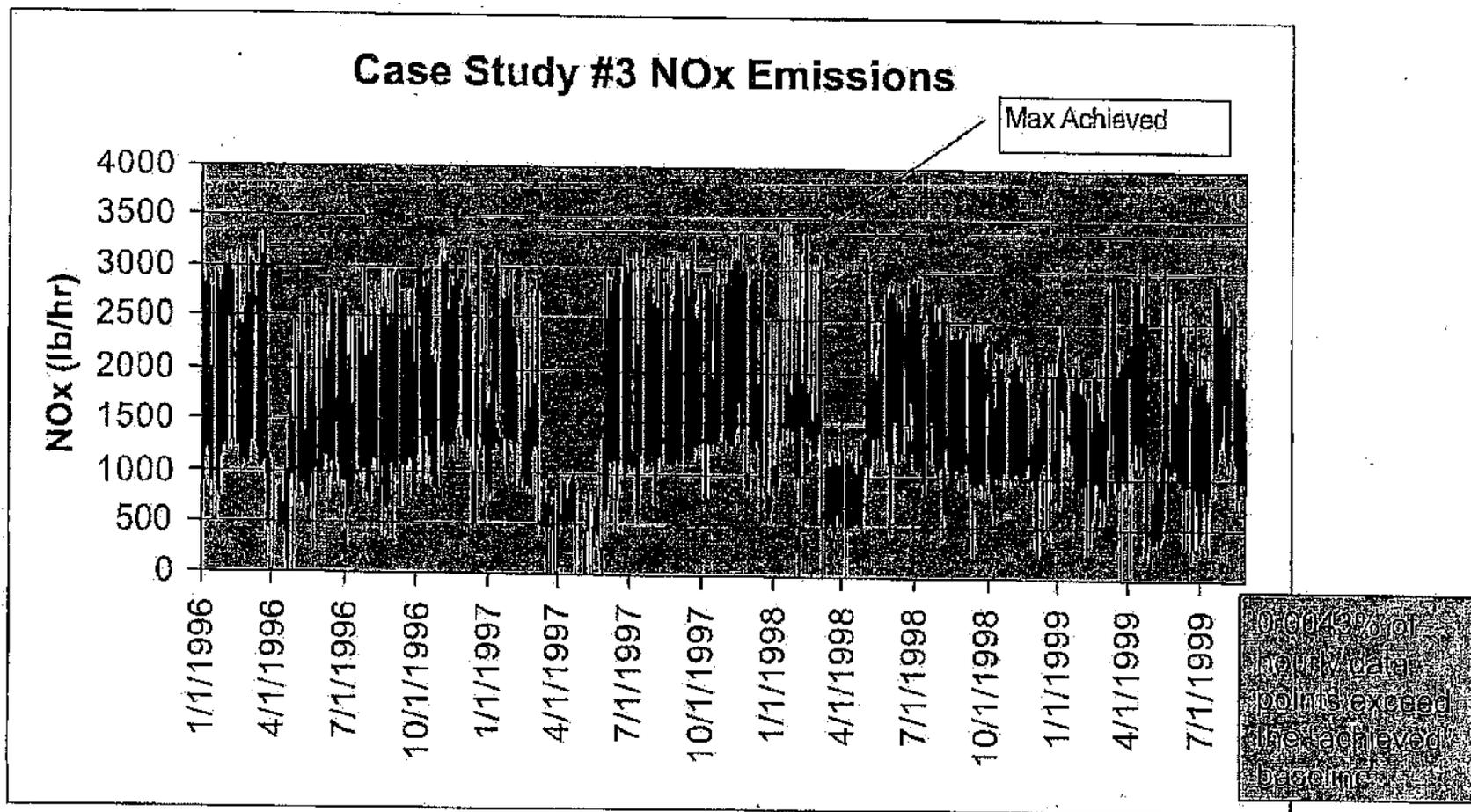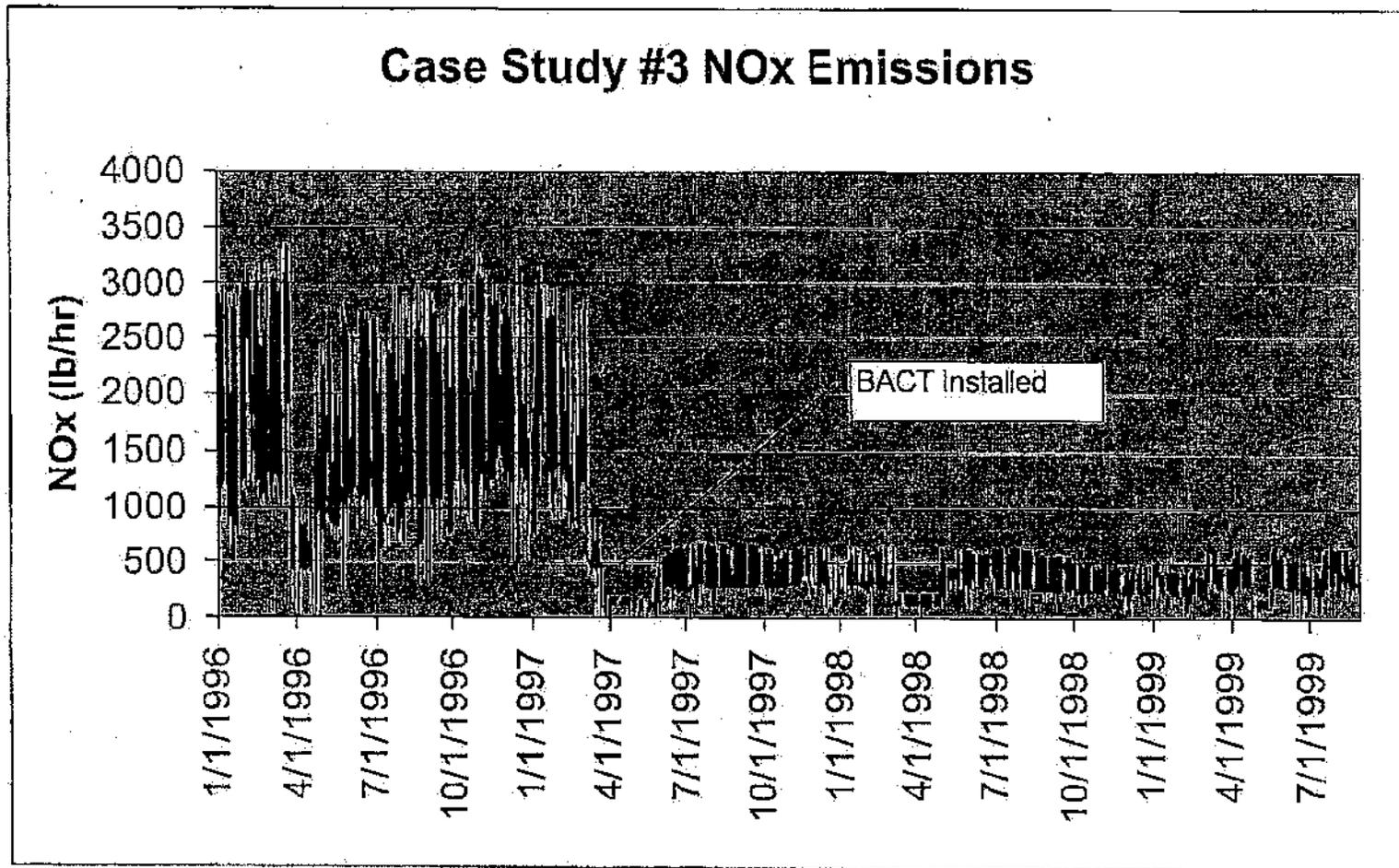All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achieved Test - NO$_x$

Case Study #3 NOx Emissions

Max Achieved

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if NO$_X$ controls were installed?
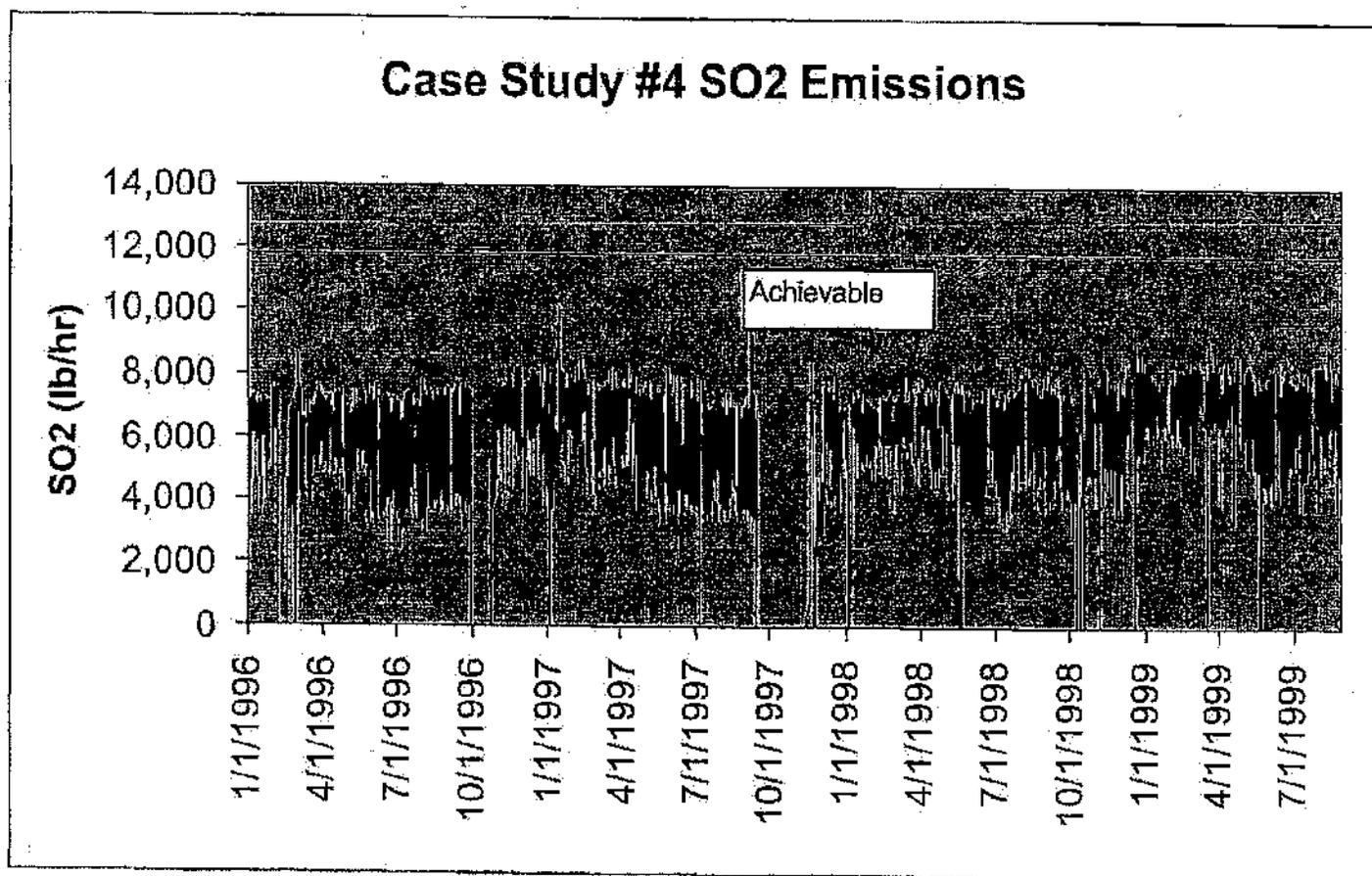

Case Study #3 NOx Emissions

NO$_X$ BACT assumed 0.100 lb/mmbtu

Case Study #4

- 508 MW Unit.

- 1997 project -- Change in method of operation - EKPC installed a newly designed turbine. Increase in capacity of 77 MW (the rated generation of the unit went from 508 to 585 W).

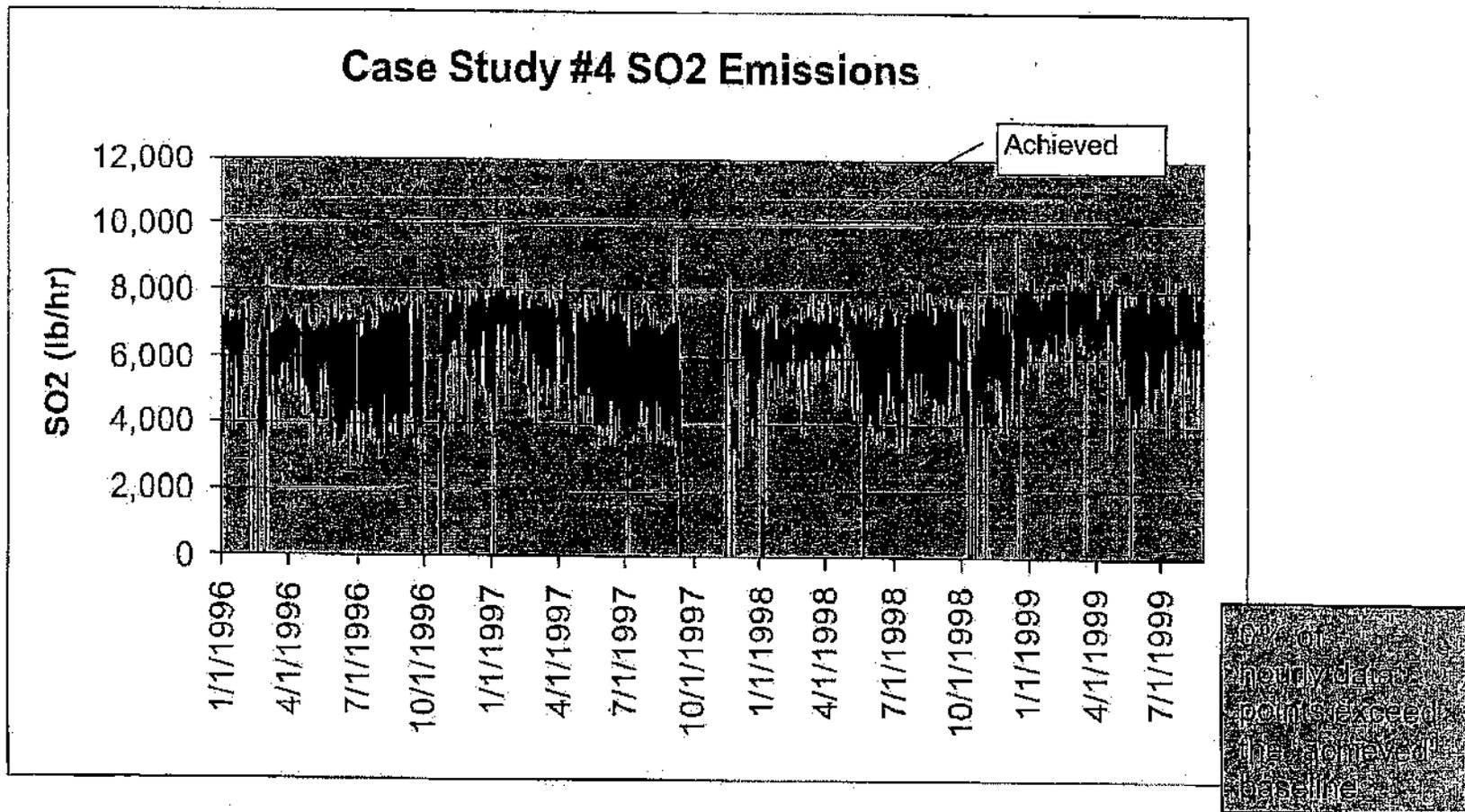- SO_2 and NO_X increased by 1,700 and 507 tons/year, respectively.

Maximum Achievable – SO$_2$

Case Study #4 SO2 Emissions

Achievable

**Achievable baseline** (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

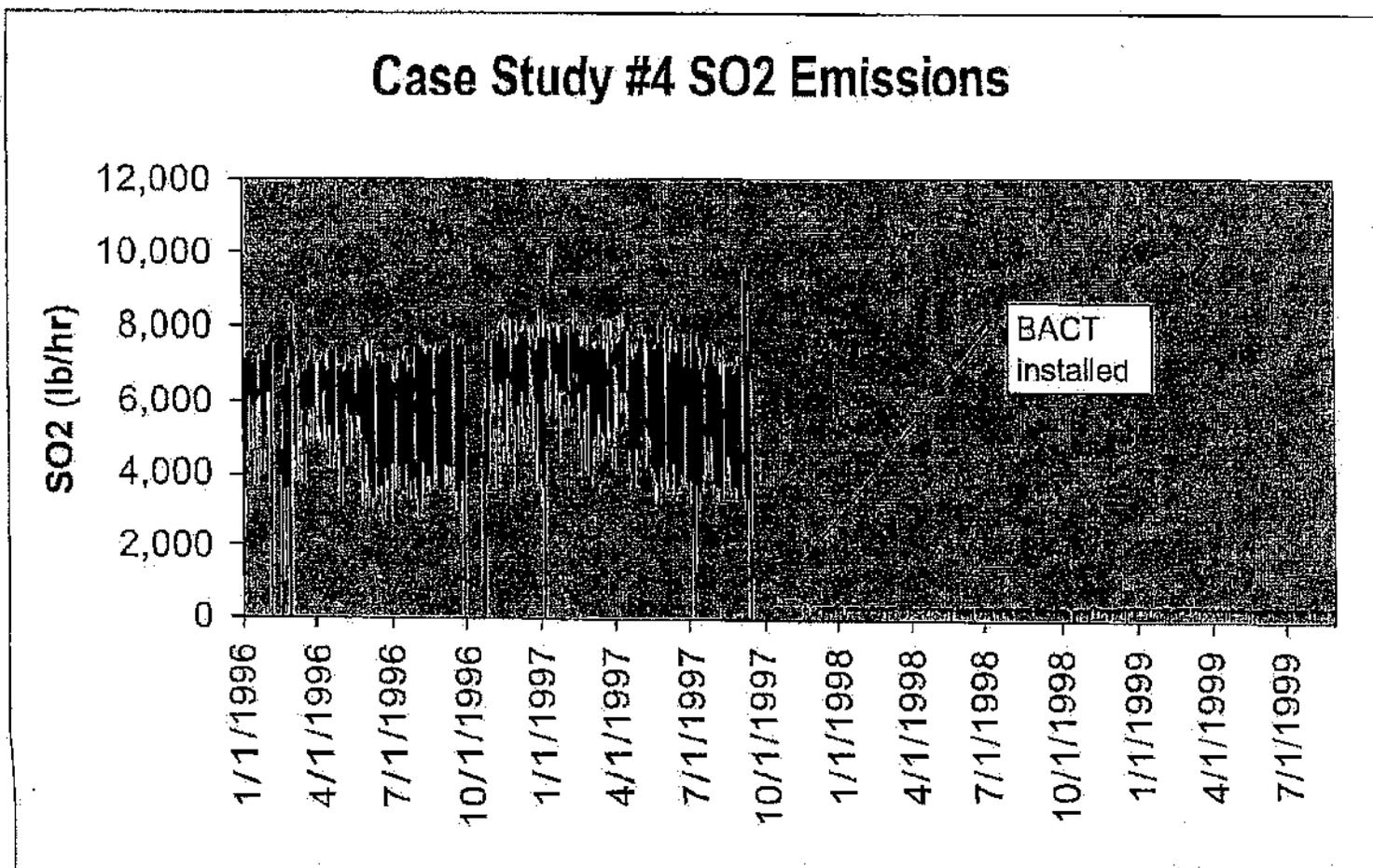All data (post-1994) was obtained from EPA's Clean Air Markets Division.

Maximum Achieved – SO$_2$

Case Study #4 SO2 Emissions

Achieved

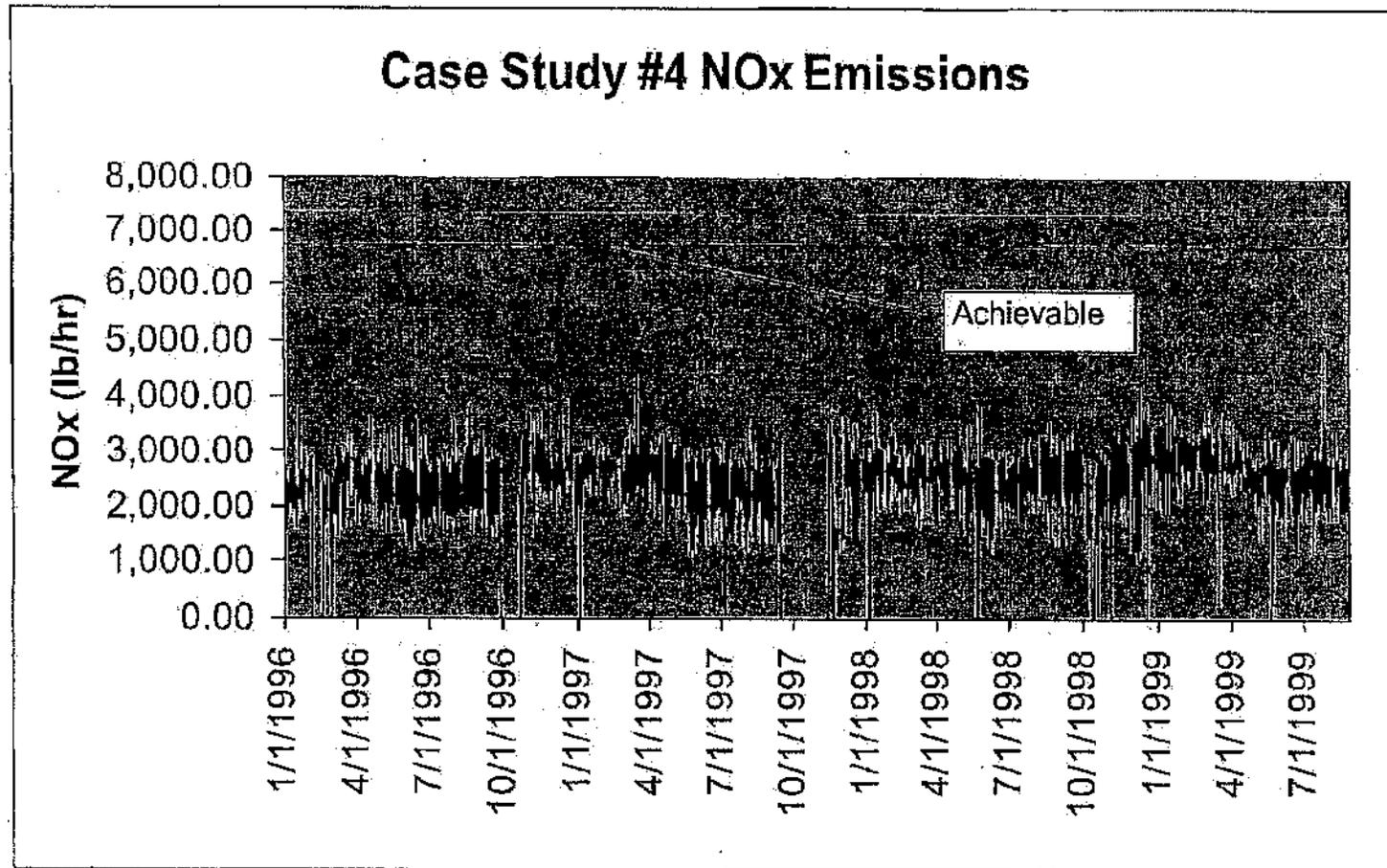Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if SO$_2$ controls were installed?

Case Study #4 SO2 Emissions

SO$_2$ BACT assumed 95% emission reductions

Maximum Achievable - NO$_X$

Case Study #4 NOx Emissions
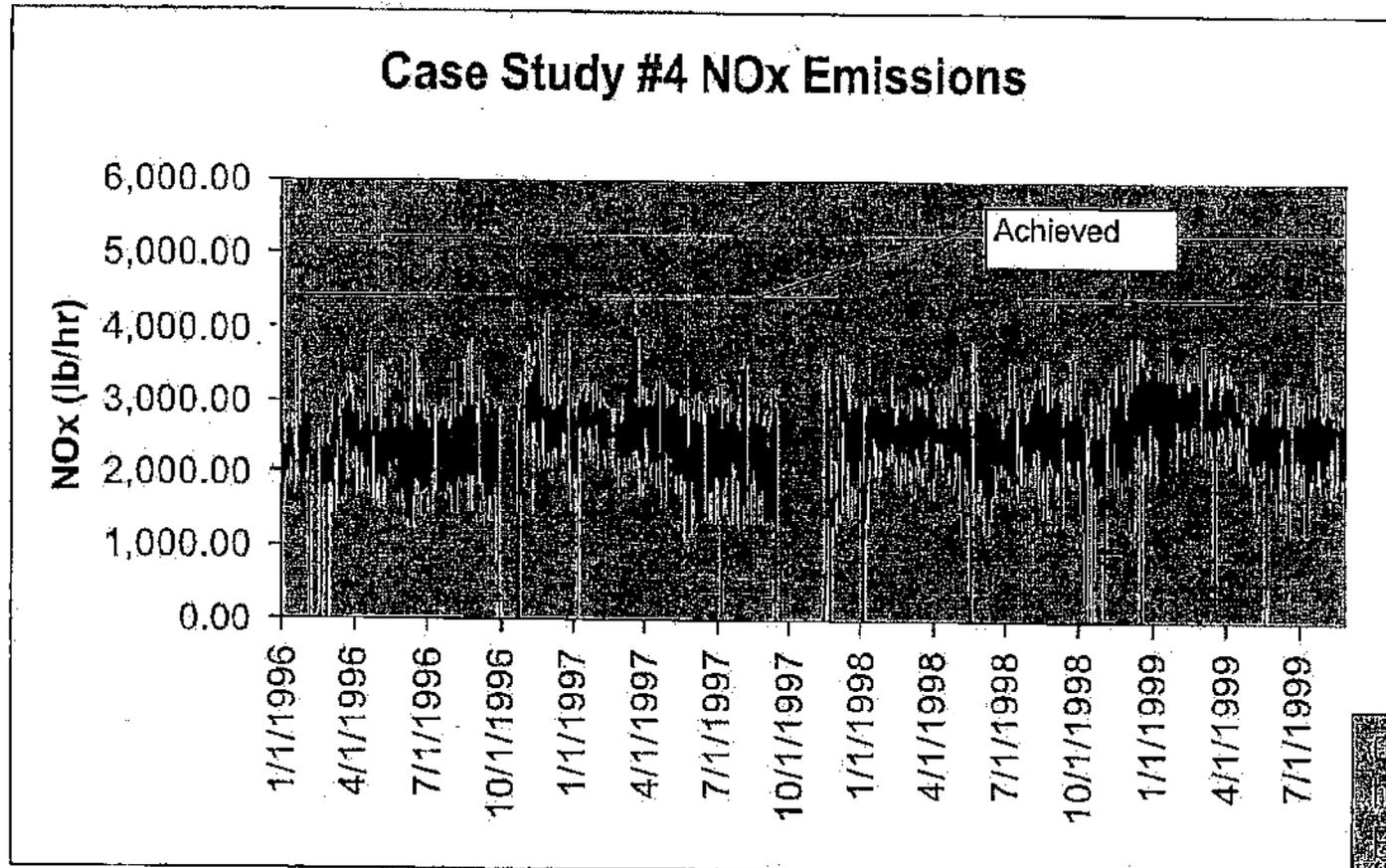
Achievable baseline (5 yrs (where available) preceding the change) = maximum emission rate in any hour x maximum heat rate in any hour.

All data (post-1994) was obtained from EPA's Clean Air Markets Division.
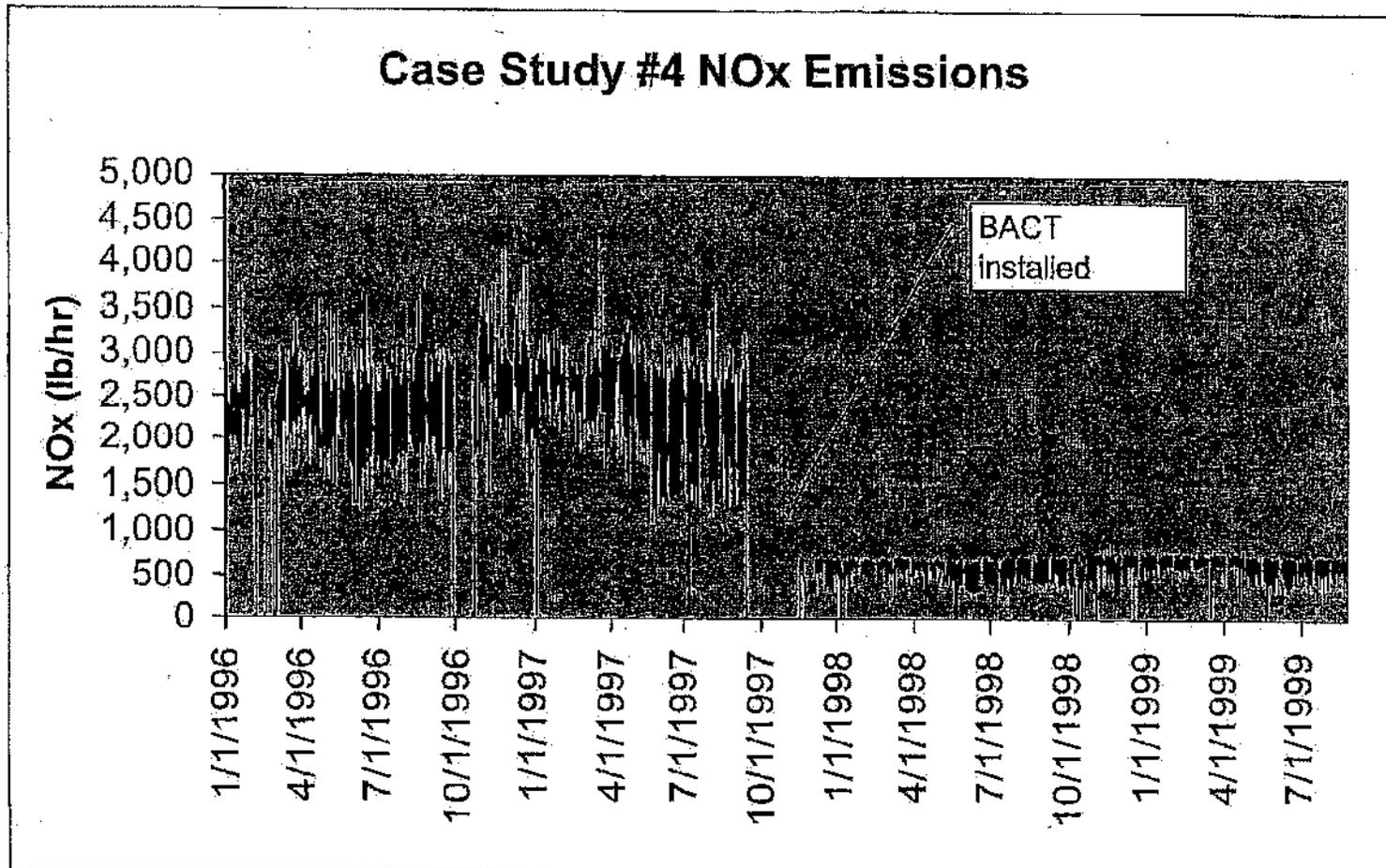
Maximum Achieved - NO$_x$

Case Study #4 NOx Emissions

Achieved baseline (5 yrs (where available) preceding the change) = maximum hourly emission rate (lbs/hr).

All data (post-1994) is from EPA Clean Air Markets Division as reported.

What if NO$_X$ controls were installed?

Case Study #4 NOx Emissions

NO$_X$ BACT assumed 0.100 lb/mmbtu

Calculations

- All information calculated using acid rain data (1995-2004).

- "Achievable" baseline calculated using maximum heat rate (mmbtu/hr) multiplied by maximum emission rate (lb/mmbtu) in the 5 years prior (where available) to the change.

- "Achieved" baseline calculated by using the maximum hourly emission rate (lb/hr) in the 5 years prior to the change.

- "Achievable baseline with data corrections" was calculated by eliminating 0.1% of outlying data points in the maximum heat rate and then multiplying the corrected maximum heat rate (mmbtu/hr) by the maximum emission rate (lb/mmbtu).

- Heat rate before and after the change was calculated using the average heat rate within the period before the change and after the change.