

COMPARISON OF EGU1 AND EGU2 TO CONSENT DECREES AND BACT LIMITS

Submitted On Behalf of
Midwest Ozone Group
Utility Air Regulatory Group

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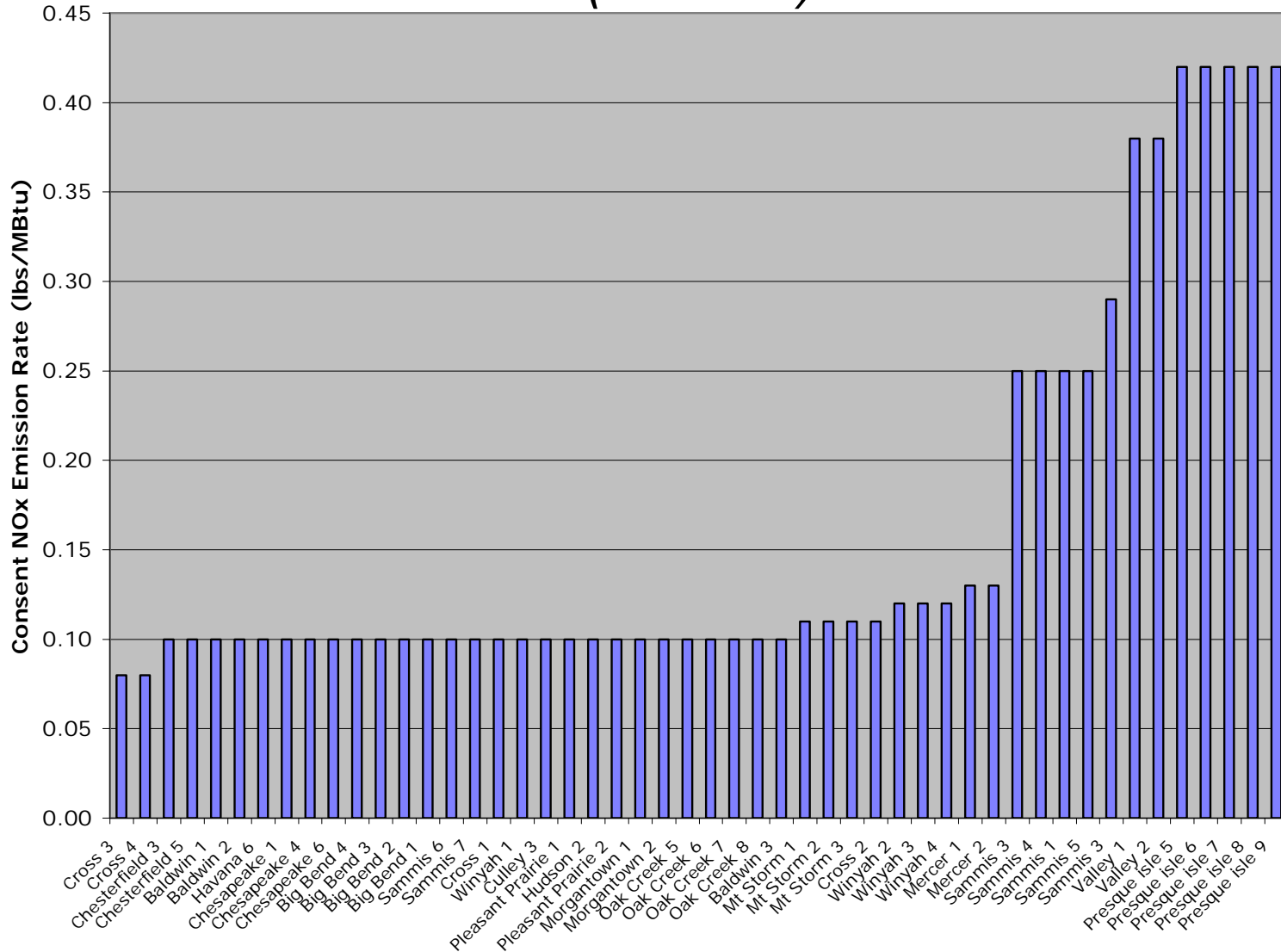
ID EGU 1: CONSENT DECREE BASIS

(per April, 2005)

- 12 Utilities, 125 Total “Affected” Units
- NOx “Actions”: 50 Units
 - SCR: 38
 - alternative controls: 12
 - retire, repower, “average”: 75
- SO₂ “Actions”: 56 Units
 - FGD @ 95%: 20
 - Rate: 36
 - retire, repower, “average”: 69

CONSENT DECREE ACTIONS: NO_x

(50 units)



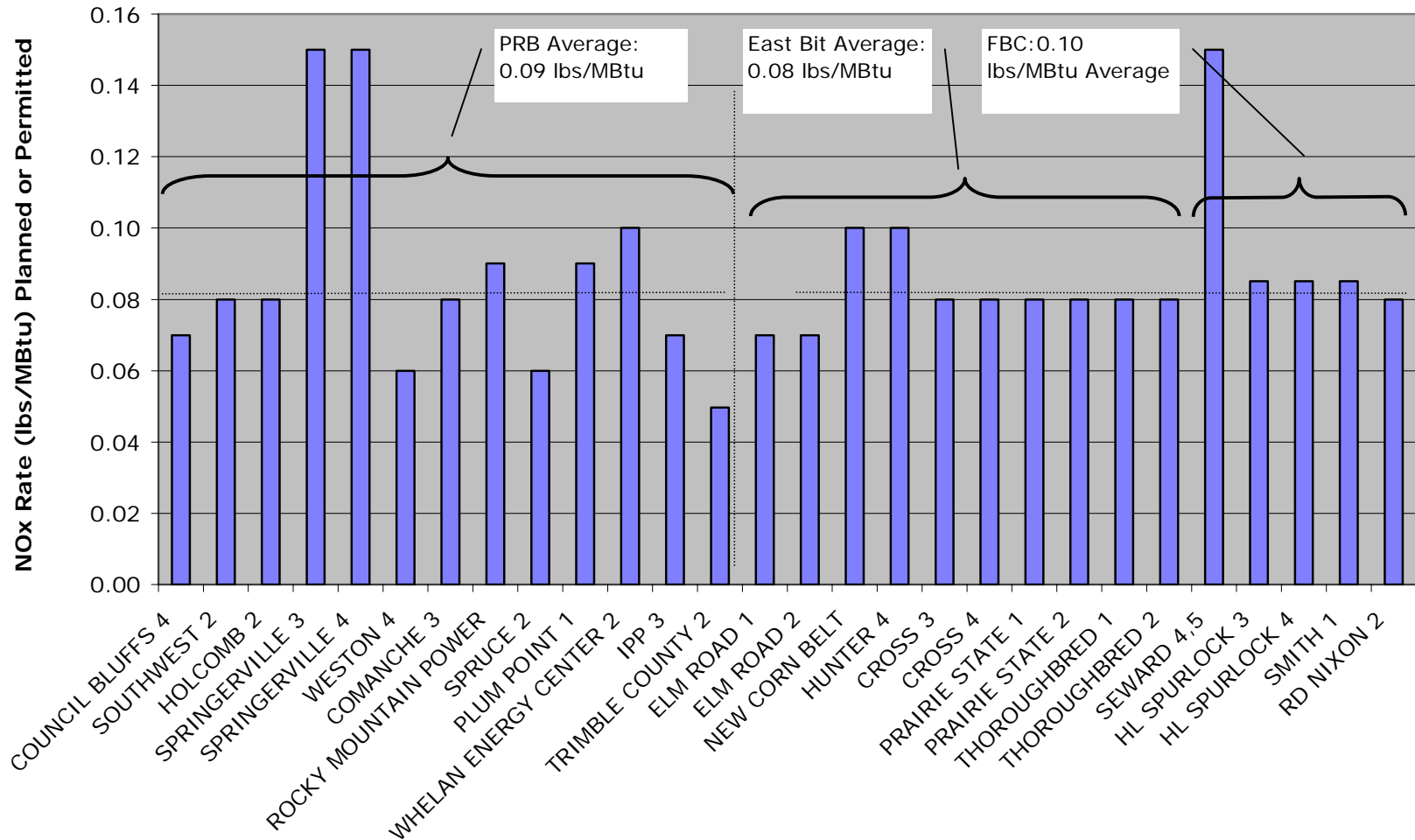
STRINGENCY OF ID EGU 1

- NO_x: 0.10 lbs/MBtu
 - lower than average of 50 units affected by consent decrees (0.16 lbs/MBtu)
 - equal to SCR-equipped units, not system average
- SO₂: 0.15 lbs/MBtu Similar to:
 - 20 units plan 95% FGD (~0.13 lbs/MBtu)
 - 10 of 20 “capped” at 95% SO₂ removal
 - EGU 1 requires > 95% SO₂ Removal for coal S > 1.6%

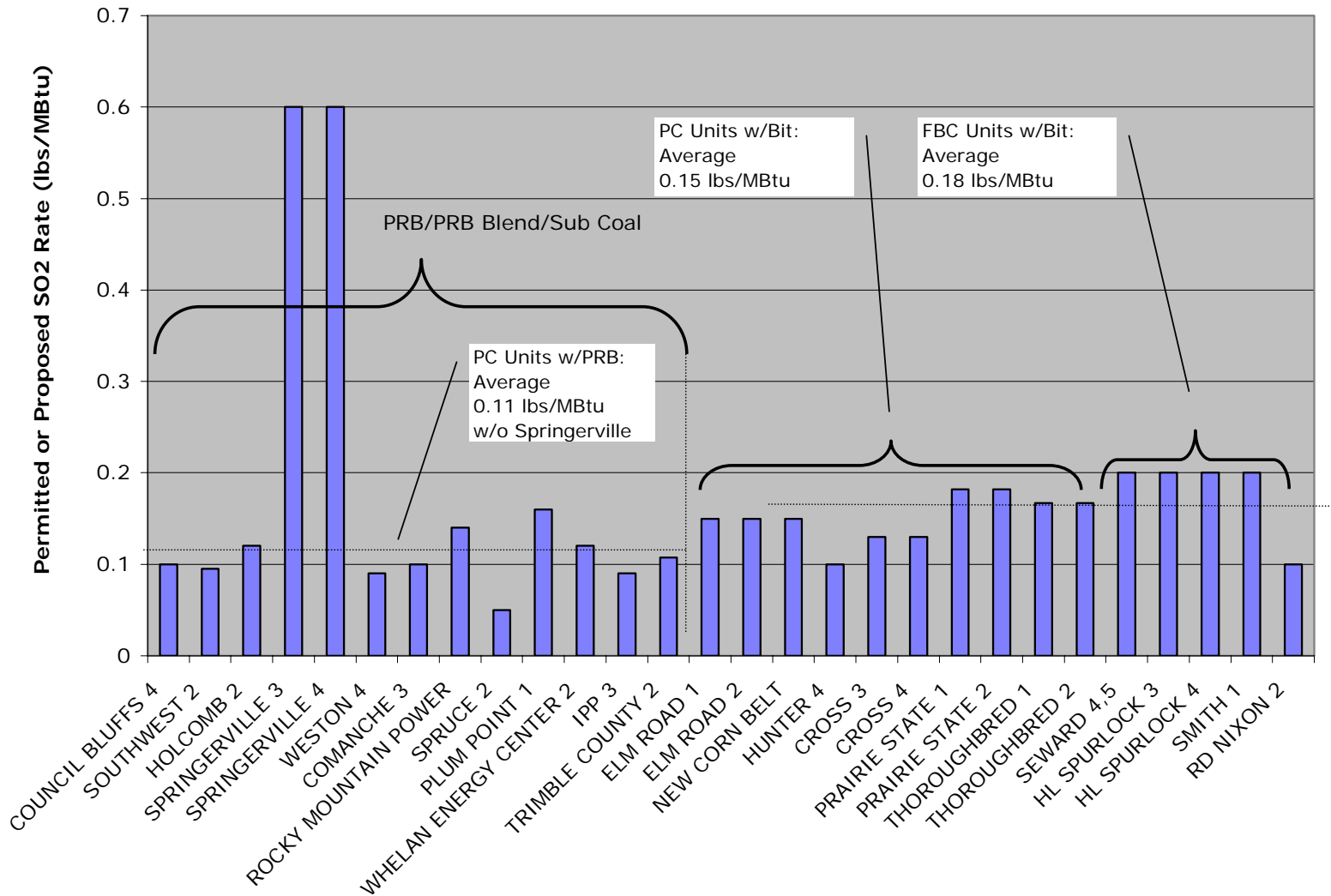
ID EGU 2: NEW UNIT BACT BASIS

- 29 Proposed Units
- Three Categories Pending Boiler Type, Coal
 - PC boiler, PRB or PRB-blends: 13 units
 - PC boiler, eastern bit: 10 units
 - Fluid bed boiler, eastern bit: 6 units

RECENT BACT ACTIONS: NO_x



RECENT BACT ACTIONS: SO2



STRINGENCY OF ID EGU 2

- NO_x: 0.07 lbs/MBtu Lower Than
 - proposed NSPS: 0.11 lbs/MBtu
 - same as PRB-fired: 0.07 lbs/MBtu
 - average bit coal-fired: 0.08 lbs/MBtu
 - average FBC: 0.10 lbs/MBtu
- SO₂: 0.10 lbs/MBtu Lower Than
 - proposed NSPS: 0.21 lbs/MBtu
 - average PRB-fired: 0.11 lbs/MBtu
 - average bit coal-fired: 0.15 lbs/MBtu
 - average FBC: 0.18 lbs/MBtu

OBSERVATION

- ID EGU 1: More Stringent Than Consent Decree Mandates
 - Reflects lowest emitters, not system average
- ID EGU 2: More Stringent Than New Unit BACT Emissions
 - Reflects lowest emitters
 - Exception: same as PRB-fired new unit NO_x levels