<u>MATS PROGRAM STATUS</u>

- Regulates Mercury, Metals HAPS, Acid Gases and Dioxin/Furans
- Mercury
 - <1.2 lbs Hg/Tbtu (except Pirkey 4.0# Hg/TBbtu)</p>
 - Monitored for reporting with Sorbent Traps on Fleet
 - Most plants will use mercury CEMS of operational indication
- Acid Gases
 - <0.002 lbs HCl/Mbtu
 - Reporting across fleet:
 - SO₂ as a surrogate (<0.2#SO₂/MBtu)

-or-

- Quarterly stack testing for HCl
- Non-Mercury Metal HAPS
 - Quarterly stack particulate monitoring (<0.03 lbs particulate/ Mbtu)
- Dioxin/Furans
 - Boiler inspections, repairs and tuning (CO, NO_x, O₂)
 - Annual reporting required.



Mercury Compliance Measures

MERCURY	ACID GASES	Non-Hg Metals
SCR & WFGD	WFGD	ESP – WFGD
ACI* & Fabric Filter	SBC** & Fabric Filter DFGS & FF	Fabric Filter
ACI & NID	NID	NID
ACI & ESP	SBC & ESP	ESP
ACI & CaBr2 & ESP	WFGD	ESP - WFGD
WFGD & GMCS	WFGD	ESP - WFGD

^{*} ACI – activated carbons are typically a halogenated variety.



^{**} SBC – Sodium bicarbonate – dry injected into fluework.

Mercury Compliance Variables

- Numerous options to comply very specific based upon plant.
 - Utilization of existing equipment.
 - Combustion process and <u>acceptable</u> fuel options.
 - Unit designed are specific to a specific type/range of coal.
 - Halogens in fuel --- Hg oxidation, corrosion, competing FGD reactions.

Economic Drivers

- Cost benefit - capital to costly = retire units
- Cost avoidance maintain ESP for ash sales/avoid landfill expansion.
- Holistic Process View (Total Evaluated Cost)
 - Sodium salts get to landfill and into landfill leachate.
 - Flyash collection in WFGD, contributes to increase arsenic in absorbers.
 - SCR ammonia slip affect on WFGD's Hg removal.
 - ESP performance with additional particulate (AC, trona, SBC).
- Equipment arrangement and space.
 - Utilize as much of existing equipment (ductwork, stack) in retrofits.
 - More remote areas increase capital and operating costs.

Schedule

- Compliance date.
- May limit options.





