



Seward
Generation

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FACILITY	PADEP LIMIT	PM	EPA MATS PM LIMIT	EPA MATS LIMIT PROPOSED	RECENT TESTED PM EMISSION VALUE
Seward Generation	0.10 lbs/mmbtu		0.030 lbs/mmbtu	0.010 lbs/mmbtu	0.00736 lbs/mmbtu

Under the MATS Rule, there is a requirement to install PM CEMS. Seward submits that the technology to implement such standard is not available, installing relevant upgrades that are needed to comply by the Rule's Compliance Deadline is not feasible, converting to Gas-fired Boilers is not feasible by the rule's compliance deadline, and that there are various issues with PM CEMS that demonstrate a lack of technical availability by of means of demonstrating compliance with the rule.

Seward believes that EPA significantly underestimated costs associated with a PM CEMS. Installation of a PM CEMS at a single unit, including site preparation and engineering activities, analyzer equipment and installation cost, and initial PS-11 correlation testing is estimated to range from \$180,000 to over \$400,000 (depending on vendor and brand). However, Seward estimates that the installation of PM CEMS at all three plants could exceed \$350,000-\$550,000.00 and would include analyzers, engineering stack studies/port installation, upgraded umbilical collection lines, revise DAHS programming, daily calibrations, semi-annual RATA certifications, and annual maintenance. Another factor is that CEMS parts need to be replaced over time. Manufacturers have stopped making CEMS replacement parts, making it necessary to replace an entire PM CEMS system more often. In addition, EPA did not account in its MATS Rule for the fact that PM CEMS needing to be replaced every 10 years or the cost of the replacement (\$180,000 to over \$400,000).

Seward notes that ongoing PM CEMS correlation testing with injection of media in the effluent to artificially raise emission levels costs at least \$250,000 per test evolution at one source, and testing is required by MATS once every three years. For some EGUs, annual costs associated with a PM CEMS are estimated to range from \$92,900 to over \$154,600, whereas annual costs associated with stack testing are estimated to range from \$24,000 to \$32,000.