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# Permitting Natural Gas Combustion Should Be Easy!







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# Permitting Considerations

PSD/Non-Attainment Review/State NSR



The following multi-state nonattainment area, Chicago-Gary-Lake County, IL-IN 8-hr Ozone area, has some states in the area that have been redesignated, but it is not considered a maintenance area until all states in the area are redesignated. The counties for this area are clipsiayed as nonattainment areas:







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Rules of Thumb for Gas Turbines (<25 MW)

#### **Federal**

- New Source Performance Standards (NSPS)
  - 25 ppm NOx for NG and 74 for Other Fuels
- Best Available Control Technology (BACT)
  - 15 to 25 ppm NOx Natural Gas
  - 60 to 74 ppm NOx Liquid Fuel
  - 15 to 74 ppm NOx on Landfill
  - 15-25 ppm on Landfill Gas
- Lowest Achievable Emission Rate (LAER)
  - 2 2.5 ppm NOx Natural Gas
  - 6 ppm NOx Liquid Fuel
  - 15-25 ppm on Landfill Gas

### State/Local BACT

- 15 to 25 ppm NOx on Natural Gas
- 25 to 74 ppm NOx on Liquid Fuel
  - 65 ppm NOx Level Common
  - 15 to 74 ppm NOx on Landfill
  - CA: 2 to 5 ppm, Natural Gas
  - MA: 2 or 2.5 ppm NOx, Natural Gas
  - CT: "...We Want Control On Everything..."

#### SCR Total Capital Investment (TCI) and Cost Effectiveness Estimate

(Purchased Equipment, Direct Installation, CEMs, Indirect Costs)

Turbine Size (MW)	SCR TCI (\$MM)	~\$/ton NOx Removed w/o Duct Firing	~\$/ton NOx Removed w/Duct Firing
~5.7	\$3.2	\$61,000	\$19,000
~7.9	\$3.5	\$56,000	\$17,000
~14.6	\$4.5	\$39,000	\$12,000
~21.7	\$5.2	\$36,000	\$11,000



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	PSD Major Source	Title V Major Source	Tailoring Rule Major Source		F Signi Leve
NOx	250 tpy	100 tpy	45 tpy		40
CO2e	555,000 tpy	222,000 tpy	100,000 tpy		89,0
MW 110		44	19.8		1

Program Level

Factor of 5.5!!!

PSD Significance Level (NOx)	Tailoring Rule Major Modification
40 tpy	34 tpy
89,000 tpy	75,000 tpy
17.6	14.9

**Calculation Basis** 

	Titan 250 (15 ppm NOx, 38.8% eff, no duct firing)			
NOx	49.3 tpy			
CO2e	109,400 tpy			
MW	21.7			



# Typical CHP Gas Turbine Emissions Signatures



Turbine Size (MW)	~Unfired Steam (Ib/hr)	NOx (tpy)	CO (tpy)	PM (tpy)	CO2e <sup>*</sup> (tpy)	~Max Fired Steam <sup>†</sup> (Ib/hr)	NOx (tpy)	CO (tpy)	PM (tpy)	CO2e <sup>*</sup> (tpy)
~ <b>4.6</b> Mercury 50	13,700	3.5	4.3	3.5	23,400	100,000	40	41	12	76,800
~ <b>5.7</b> Taurus 60	29,700	16	16	5.3	35,200	125,000	56	56	14	93,500
~ <b>7.9</b> Taurus 70	36,400	20.4	20.7	6.8	43,500	155,000	70	70	18	115,800
~ <b>14.6</b> Titan 130	64,500	37.4	37.9	12.6	83,200	295,000	130	131	33.5	218,600
~ <b>21.7</b> Titan 250	77,600	49.3	50	16.6	109,400	405,000	180	181	45.9	300,100

\*Note CO2e in short tons. Permitting is based on short tons. Reporting programs based on metric tons.

<sup>†</sup> Assumed 0.08 lb/MMBtu (HHV) duct burner.





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  - Netting
  - Dispersion Modeling
  - NSPS/MACT

NO/NO2 Ratios					
SoLoNOx	0.3				
Conventional	0.15				
Mercury 50	0.15				

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**Solar Turbines** 

A Caterpillar Company

- Dispersion Modeling
- NSPS/MACT

#### • The CHP Catch 22

- Executive Orders and Incentive Programs Encouraging CHP Development
- GHG Cap and Trade Impacting CHP Use and Development
- Tailoring Rule Impacting Industrial Development ...including CHP
- Texas "Gets It"
  - Permit by Rule for Natural Gas Fired CHP







# **Bottom Line**



- CHP Saves on Energy Costs: CHP helps U.S. manufacturers be more competitive by efficiently generating electricity and thermal energy on-site (distributed generation). CHP is up to 80% efficient versus historic grid efficiencies well below 50%
- CHP Lowers the cost of New Generation Capacity: CHP is a low-cost approach to efficient new generation capacity and does not require additional power transmission investments (power lines).
- CHP has Low GHG Emissions: CHP is highly efficient and operates on natural gas or renewable fuels like landfill methane and biogas. With efficiencies up to 80%, CHP minimizes the amount of GHG produced per unit of useful energy. CHP is the most efficient method of burning natural gas to product electric and thermal power.
- CHP Strengthens Grid Security and Reliability: CHP is "on-site" power which shelters its users from grid outages caused by natural or human events. CHP can also export electricity to the grid to help supplement central power station capacity.