California's Success in Controlling Large Industrial Sources

Endicott House 2006 Symposium

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Today's Presentation

Background

- New Source Review in California
- Industrial Source NOx Control Overview
 - Power Plants
 - Oil/Gas Production and Refining
 - Other Sources: Glass Manufacturing, Cement Manufacturing, Stationary Diesel Engines
- Questions

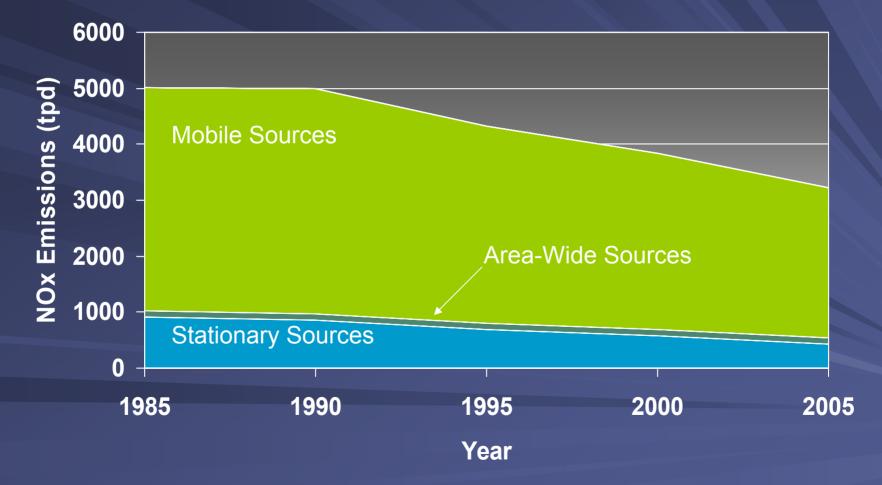
Background: California Regulatory Structure ARB regulates mobile sources, consumer products, and air toxics Local air districts regulate stationary sources and other emission sources - 35 local air districts - Responsible for permitting/prohibitory rules ARB has oversight authority

Background: 2005 Annual Average Emissions Statewide

| Category | NOx (tpd) | ROG (tpd) | SOx (tpd) |
|--|-------------------|------------------|--------------|
| Total Stationary Sources | 420 (13%) | 473 (19%) | 112 (37%) |
| Total Fuel Combustion | 324 | 48 | 38 |
| Total Waste Disposal | 3 | 14 | <1 |
| Total Cleaning and Surface Coatings | <1 | 210 | <1 |
| Total Petroleum Production & Marketing | 9 | 145 | 46 |
| Total Industrial Processes | 84 | 55 | 28 |
| Total Area-Wide Sources | 112 (4%) | 750 (31%) | 11 (4%) |
| Total Mobile Sources | 2687 (83%) | 1207 (50%) | 179 (59%) |
| TOTAL STATEWIDE | 3,219 | 2,430 | 302 |

Source: ARB Almanac Emission Projection Data

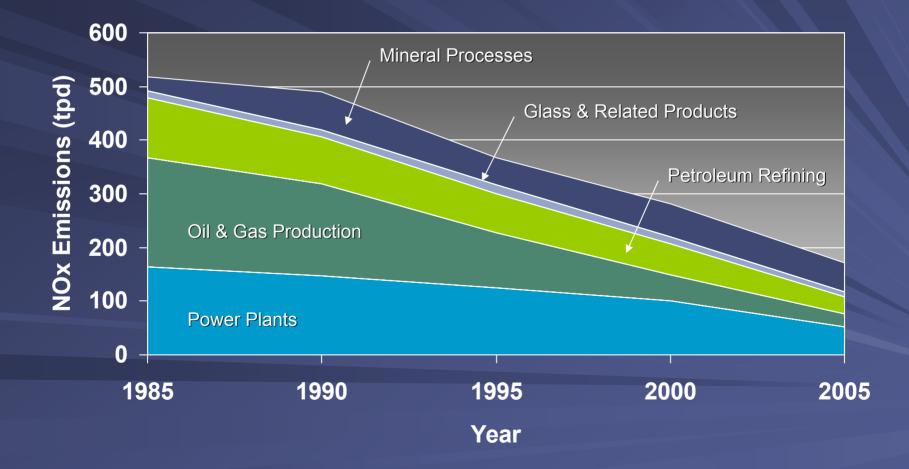
Background: Statewide NOx Emission Trends (1985-2005)



Background: 2005 State Top 10 NOx Sources

| | 2005 Annual Average Emissions |
|----|---|
| 1 | Heavy Duty Diesel Trucks |
| 2 | Light Duty Cars |
| 3 | Ships & Commercial Boats |
| 4 | Off-road Equipment (construction and mining) |
| 5 | Trains |
| 6 | Off-road (other) |
| 7 | Farm Equipment (tractors) |
| 8 | Manufacturing & Industrial (boilers, engines) |
| 9 | Heavy Duty Gas Trucks |
| 10 | Service & Commercial (boilers, engines) |

Background: Industrial Source Statewide NOx Emission Trends (1985-2005)



NSR's Success in California

California's NSR in effect over 20 years BACT is cornerstone California BACT akin to federal LAER - Applied on emissions unit basis - In severe areas, BACT at 10 lb/day; some areas have BACT triggers of ≤2 lb/day NSR contributes to air quality improvements NSR not deterrent to economic expansions

NSR Challenges: Offsets

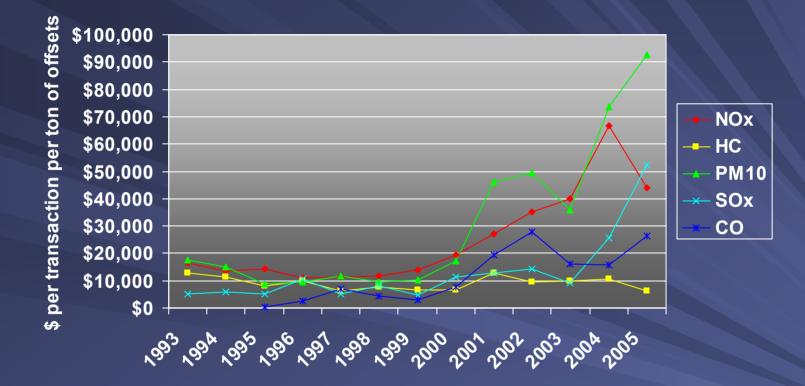
Offsets available in some areas, constrained in others

1999 power plant expansion impacted supply/cost
 "Surplus" criteria difficult due to air quality problems

Focus now on "non-traditional" sources

- South Coast pilot credit rules are U.S. EPA approved for RECLAIM
 - truck stop electrification and marine vessel repowering
 - South Coast only district in California to modify NSR rules to allow use of limited-life offsets

Statewide Average Offset Costs

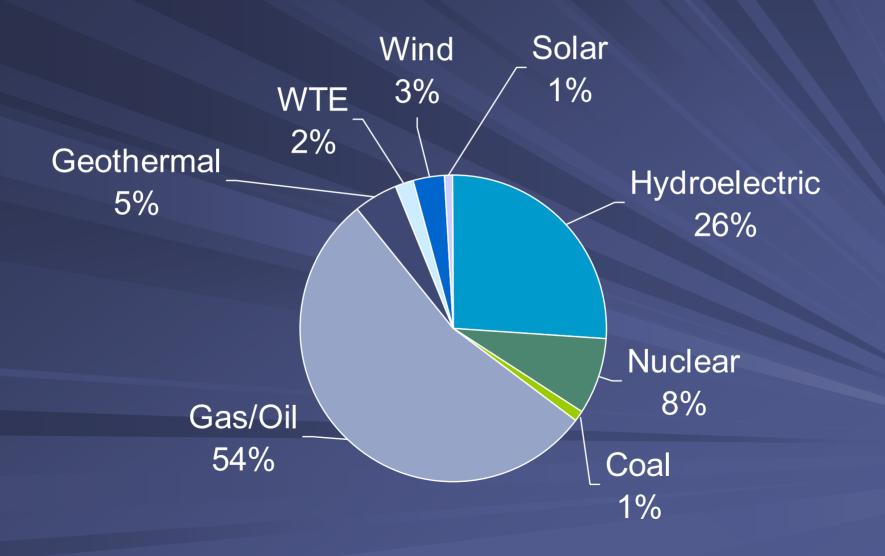


Prices for several pollutants rose with California energy crisis; significant increase in PM10 cost since 2001
 Offset availability a factor in driving emission reductions

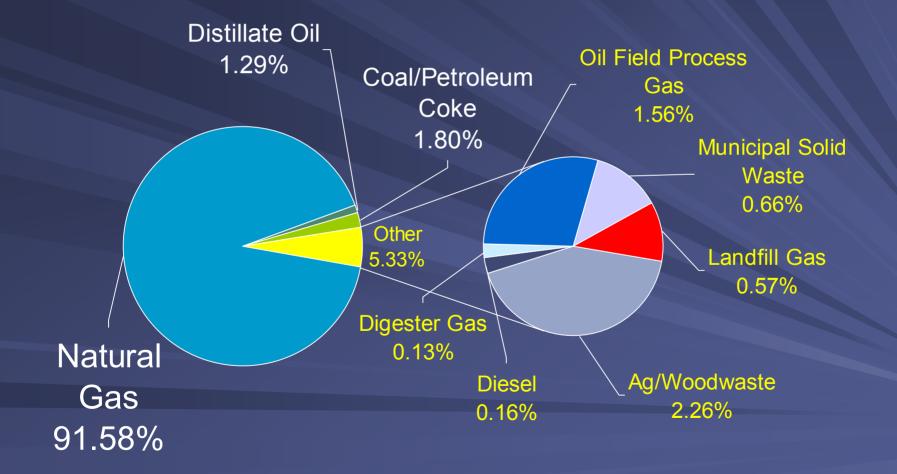
POWER PLANTS

California Power Mix

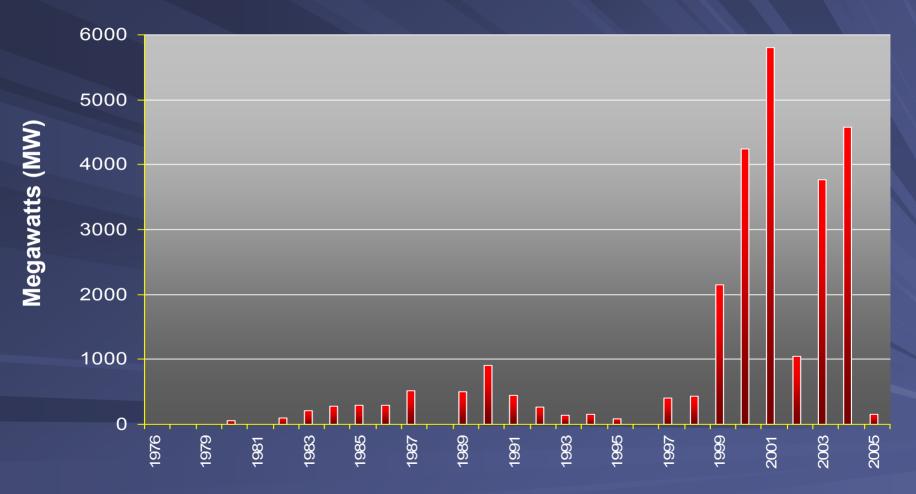
(Based on Installed Capacity)



California In-State Fuel-Fired Generation



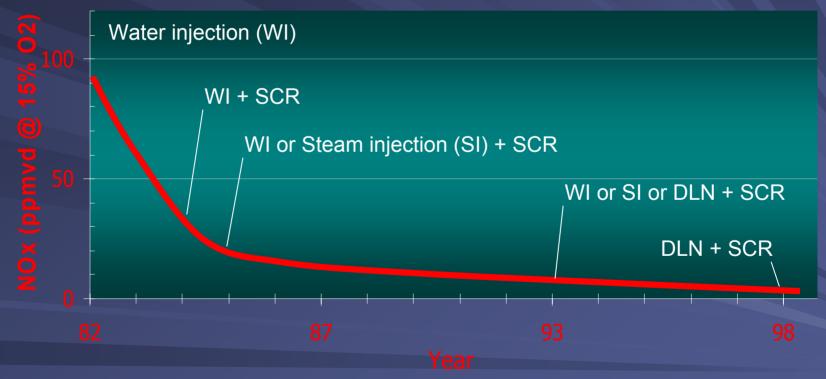
Power Plant Projects Approved By Year (1976 to 2005)



Source: California Energy Commission

Power Plant NOx BACT Trend: Combined-Cycle/Cogeneration Turbine Configurations

97% Reduction Since 1982



Typical Turbine NOx Requirements

| | Turbine Configuration | NOx (ppm @ 15% O ₂) |
|------------------|---------------------------|---------------------------------|
| BACT | Simple cycle, gas-fired | 2.5 |
| (new units) | Combined cycle, gas-fired | 2.0 |
| BARCT | Simple cycle | 5* (gas)/ 25 (oil) |
| (existing units) | Simple cycle ≤ 877 hr/yr | 25** (gas)/ 42** (oil) |
| | Combined cycle | 5* (gas)/ 25 (oil) |

* Sources opting for extended compliance date must meet 3 (gas)
** Sources opting for extended compliance date must meet 5 (gas)/25 (oil)

Common combustion controls: water/steam injection, dry low-NOx combustors
 Common add-on controls: SCR, SCONOx

Cost of Emission Controls

Typical 500-MW combined-cycle plant costs \$250 to \$300 million

Cost of NOx/CO controls \$6.5 to \$7.5 million

Percent of capital cost less than 3%

Additional cost of 0.2¢ per kWh generated



National vs. California Emissions For Thermal Electric Generation

| | lb/MWh | | Tons/yr | |
|-----------------------|--------|-------|-----------|------------|
| | NOx | SOx | NOx | SOx |
| California (2005) | 0.357 | 0.033 | 26,400 | 1,900 |
| South Coast air basin | 0.232 | | | |
| Western U.S.* | 1.74 | 1.32 | 616,000 | 470,000 |
| U.S. Average* | 2.99 | 7.79 | 4,400,000 | 11,400,000 |

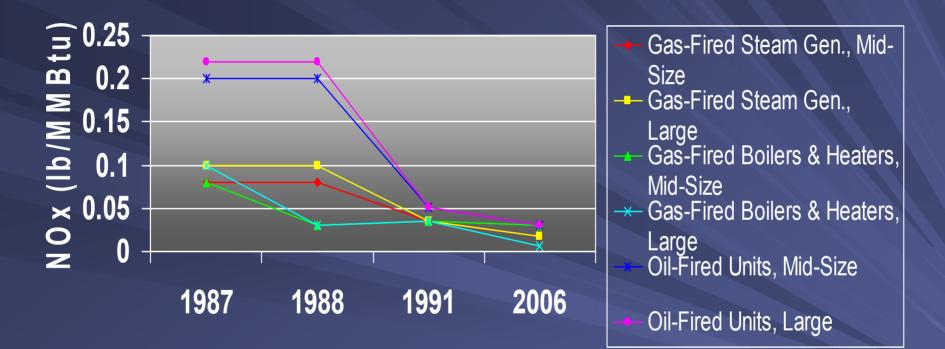
* Based on Energy Information Administration (EIA) data for 2004

Push for California-Level Controls in Border Region

- ARB comments on cross-border projects, both transmission and power generation projects
- Concern over poorly controlled power plants that transport emissions into California
- Two turbine plants that will export electricity to CA agreed to emission levels close to CA BACT
 - 2.5 ppm NOx (SCR), 4 ppm CO (oxidation catalyst)
 - 3.5 ppm NOx (SCR), 30 ppm CO



NOx Control History: Boilers, Steam Generators & Process Heaters



For gas-fired units, approximately 63% to 94% reduction since 1987
 For oil-fired units, approximately 85% reduction since 1987

Boiler NOx BACT

Based on most stringent CA BACT guidelines

| Size Rating | NOx Emission Level (@ 3% O ₂) | Typical Technology | Rest of U.S.* |
|--|--|---|-------------------|
| <20 MMBtu/hr, natural gas or propane | 12 ppm (0.015 lb/MMBtu) | Low NOx burner | 0.03 Ib/MMBtu |
| ≥20 MMBtu/hr, natural gas or propane | 7-9 ppm (0.009-0.011 Ib/MMBtu) | Low NOx burner, SCR or equivalent | 0.034 Ib/MMBtu |
| Dual fuel or oil fired | 30 ppm or weighted average (0.036 for gas and 0.039 lb/MMBtu for oil) | Low NOx burner | |

* Most stringent limit found in EPA RACT/BACT/LAER Clearinghouse

Refinery Process Heater NOx BACT

Based on most stringent CA BACT guidelines

| Size Rating | NOx Emission Level (@ 3% O ₂) | Typical Technology | Rest of U.S.* |
|--|---|--|---------------|
| ≤50 MMBtu/hr, natural gas and/or LPG | 30.0 ppm, achieved (0.036 lb/MMBtu) 1.7-25.0 ppm, feasible (0.002-0.031 lb/MMBtu) | Low NOx burner Low NOx burner, low NOx burner + SCR | 0.03 lb/MMBtu |
| >50 MMBtu/hr, natural gas or treated refinery gas | 9.0 ppm, achieved (0.011 lb/MMBtu) 1.7-9.0 ppm, feasible (0.002-0.011 lb/MMBtu) | SCR LTO system, low NOx burner + SCR | 0.08 lb/MMBtu |

* Most stringent limit found in EPA RACT/BACT/LAER Clearinghouse

Oilfield Steam Generator NOx BACT

Based on most stringent CA BACT guidelines

| Size Rating | NOx Emission Level (@ $3\% O_2$) | Typical Technology |
|---|--------------------------------------|------------------------|
| ≥5 MMBtu/hr, natural gas, treated waste | 20.0 ppm (achieved) | Low NOx burner |
| gas, or recovered gas | 9.0-14.0 ppm (feasible) | Low NOx burner, SCR |

Oilfield Steam Generator NOx BACT Trend



OTHER SOURCES: Glass, Cement, Diesel

Typical Glass Furnace NOx Requirements

| | Furnace Type | Combustion Type | NOx Limit (lb/ton glass pulled) |
|---------------------------|----------------------------------|---|---|
| CA BARCT (existing units) | Container glass or fiberglass | 100% air fuel fired, Oxygen assisted combustion | 4.0 (24-hr block average) |
| | Flat glass | 100% air fuel fired, Oxygen assisted combustion | 9.2 (24-hr block average), 7.0 (30-day rolling average) |
| RACT, Rest of U.S.* | Container glass | | 5.5 |
| CA BACT | Container glass | Using oxy-fuel system | 3.0 (achieved in CA) |
| | Flat/float glass | Using SCR system | 3.70 |
| LAER, Rest of U.S.* | Float glass | | 6.5 |
| BACT, Rest of U.S.* | Flat/float glass | | 7.0 |

* From EPA RACT/BACT/LAER Clearinghouse

Cement Kiln NOx RACT/BARCT

| Type of Kiln | NOx Limit* |
|-----------------------|--|
| Preheater-precalciner | 6.4 lb/ton clinker produced (30-day average) |
| Long dry | 6.4 lb/ton clinker produced (30-day average) |
| Short dry | 7.2 lb/ton clinker produced (30-day average) |

* Adjustment to NOx limit for systems that recover waste heat and generate electricity

Typical controls: combustion controls, low NOx burners, staged combustion, NOx reducing fuels (includes tire-derived fuels)

Stationary Diesel Engines

1998: ARB identified diesel PM as a toxic air contaminant

Diesel PM contributes >70% of state estimated potential cancer risk levels and contributes to premature death

2000: ARB adopted a Diesel Risk Reduction Plan

Goal: 85% reduction in diesel PM by 2020

Stationary Diesel Engines

February 2004: ARB adopts ATCM for stationary diesel engines

 Use best available diesel PM controls and lowest-emitting diesel engines

After-treatment technology shown effective

 Diesel Particulate Filter: \$38/hp capital cost
 Diesel Oxidation Catalyst: \$10/hp capital cost

80% reduction in diesel PM from all stationary engines by 2020 relative to 2002

Summary

NSR effective at time of installation Offsets are a continuing challenge Significant emission reductions achieved through cost-effective technology Controls applicable nationwide Future challenges exist to further reduce emissions due to ongoing air quality problems

QUESTIONS?