



DEPARTMENT OF
ECOLOGY
State of Washington

Technical Support Document for Second BART (Best Available Retrofit Technology) Order Revision

*TransAlta Centralia
Generation Plant*

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Executive Summary

TransAlta requested a revision to their existing BART order to mitigate fouling of their electrostatic precipitators (ESPs) with ammonia sulfate. In 2019, TransAlta experienced emission opacity readings that would have exceeded the opacity limits if TransAlta had not reduced plant capacity to compensate. The proposed mitigation is for TransAlta to install and operate a Combustion Optimization System with Neural Network (Neural Net) and have a lower nitrogen oxides (NOx) emission limit on the unit that is operational beyond 2020.

TransAlta was previously required to install Selective Non-Catalytic Reduction (SNCR) for control of nitrogen oxides emitted from their Centralia Power Plant. As a condition of the BART order issued to the facility, an optimization study was required to be performed and the results of that study implemented by the facility. After conducting the optimization study, TransAlta discovered that the ESPs were fouled from ammonia use required in the current BART order (Revision 1).

Southwest Clean Air Agency agreed to use enforcement discretion in 2019 on the urea injection rate while TransAlta was tuning the Neural Net. At the end of Calendar Year 2019, TransAlta had enough data to agree that the Neural Net system would be able to meet a 0.18 lb/MMBtu emission standard. TransAlta submitted a request to revise their BART order in January 2020.

TransAlta, Southwest Clean Air Agency, and Ecology agreed on the conditions for Revision 2 for the BART order to include lower nitrogen oxides limits, changes to the use and monitoring of ammonia, and removal of the requirement to analyze the coal sulfur and nitrogen content.

Reason for this Revision

Trans Alta requested a revision to their existing BART order to mitigate fouling of their electrostatic precipitators (ESPs) with ammonia sulfate. The proposed mitigation is for TransAlta to install in one boiler unit a Combustion Optimization System with Neural Network (Neural Net) in order to reduce the urea injection rate (the source of the ammonia). The other boiler unit is currently slated to cease coal-fired power generation on December 31, 2020 and is not scheduled to have the Neural Net installed. Ecology and Southwest Clean Air Agency are willing to accept a lower urea injection rate if TransAlta is willing to accept a lower nitrogen oxides emission limit. Ecology has determined that the nitrogen oxides reduction resulting from lowering the emission limit to 0.18 lb/MMBtu nitrogen oxides will be slightly beneficial for the environment and reduce regional haze.

Ecology will modify the BART order by:

- Lowering the nitrogen oxides emission limit on one unit to 0.18 lb/MMBTU
- Requiring the unit that continues to provide coal-fired power production after 2020 to meet the 0.18 lb/MMBtu nitrogen oxides.
- Changing the language to “Permanently cease coal-fired power generation operations of one Boiler in 2020 and the other Boiler in 2025, which dates are prior to the 2035 end of their expected useful lives” to match the new language in the MOA.
- Removing the requirement to sample the coal for nitrogen and sulfur content.
- Removing the requirement to report to Southwest Clean Air Agency results of coal test.
- Removing the requirement of a specific urea injection rate to allow TransAlta to inject urea as required (or if required) to meet the new emission standard.
- Changing the requirement for ammonia emission monitoring only to require monitoring when using a urea injection rate of greater than 1.5 gallons per minute

Ecology is also modifying the compliance schedule to eliminate the requirement to demolish the coal units to align the BART order’s language with language in the Memorandum of Understanding (MOA) between the State of Washington and TransAlta.

SNCR and Other Related Changes

The requirement to install SNCR along with the requirement to meet Washington's greenhouse gas emission performance standard was enacted by the legislature in 2010. The legislative requirement resulted in the first BART order revision. This first revision was finalized in December 2011 and approved by EPA December 16, 2012.

Originally, Revision 2 was intended to incorporate the results of the SNCR Optimization Study required by Condition 5 of the First Revision of the amended 2012 BART order. The study was to demonstrate the proper use of ammonia in controlling emissions of nitrogen oxides generated by the combustion of coal in the TransAlta boilers. Goals of the study were to determine how low nitrogen oxides emissions could be attained while meeting an ammonia slip limit of 10 ppm.

TransAlta completed the required ammonia injection optimization testing in two phases. The first phase was completed and the required report submitted in September 2014. Ecology and Southwest Clean Air Agency requested additional testing. This additional testing was performed and updated test results were submitted in August 2016. The updated test results were accepted by Ecology and Southwest Clean Air Agency on November 7, 2016. Ecology's letter accepting the final report included a requirement for urea injection in Unit 1 at 1.2 gallons per minute and 2.0 gallons/minute in unit 2. The prescribed urea injection level was constant for all power generation levels.

Condition 5 of the First Revision of the BART order required TransAlta to submit a request to revise the BART order to reflect the results of the study. In a letter dated November 28, 2016, TransAlta requested specific revisions to the BART order to reflect the findings of the study.

Before Ecology was able to take action on TransAlta's request, TransAlta started a third optimization study in response to a compliance order with Southwest Clean Air Agency. The intent of the third optimization study was to fine-tune certain plant operating parameters and verify the result of the second optimization study. The results of the third study would augment or replace the results of the previous studies. An initial SNCR optimization test plan was submitted to Ecology by email on February 6, 2019.

In the summer of 2019, TransAlta experienced emission opacity readings that would have exceeded the opacity limits if TransAlta had not reduced plant capacity to compensate. During a maintenance shut-down of the facility, the electrostatic precipitators (ESPs) were examined. The ESPs had a visual fouling of all interior components, which dramatically reduced their efficiency. Samples of the material in the ESPs were analyzed and identified as ammonia sulfate. The source of ammonia in the system was from the reactions of urea in the SNCR system.

To decrease the ammonia slip in the SNCR, TransAlta installed a computerized emission control system called a Combustion Optimization System with Neural Network program (Neural Net). The Neural Net is able to monitor and adjust more system variables at the same time than the manual control system. TransAlta notified Ecology and Southwest Clean Air Agency by email on July 8, 2019 of the installation of the Neural Net and the start of tuning the system.

TransAlta submitted a request on January 30, 2020 to modify Revision 1 of the BART order. The modification proposes the installation of the Neural Net and eliminates the mandatory urea injection requirements.

Revision 2 incorporates those changes and removes outdated requirements.

Compliance schedule related change

On July 13, 2017, the Memorandum of Agreement (MOA) between the State of Washington and TransAlta was amended. Subsection D(5) of the Recitals was modified. The 2011 MOA stated, “permanently cease power generation...” The 2017 MOA amendment reads:

(5) permanently cease coal-fired power generation operations of one Boiler in 2020 and the other Boiler in 2025, which dates are prior to the 2035 end of their expected useful lives, in each case pursuant to the terms and subject to the conditions of this MOA.

The change in the MOA does not require decommissioning of the units as envisioned (but not explicitly required) in 2011 with the passage of Chapter 180 (see Laws of 2011 - ESSB 5769 in 2011, codified in several locations). The change in the order reflects the pertinent portions of this law as codified in Chapters 80.80 and 80.82 RCW.

Ecology used the 2011 expectation that the plant would close to comply with the greenhouse gas emissions performance standard in RCW 80.08.040(3). Ecology also used the planned closure of the plant in the 2011 Regional Haze State Implementation Plan to project visibility benefits from the plant meeting the standard according to the schedule in the law. If power generation of the coal plant is replaced with a different form of combustion power generation (e.g., natural gas), the impact to regional haze would have to be analyzed separate from this BART order modification.

If TransAlta decides to switch to non-coal power generation, a Notice of Construction application would need to be submitted to Southwest Clean Air Agency by the company. Ecology would require the company to do, at a minimum, emissions modeling that would be required under the BART process to quantify the visibility impacts resulting from the operation as a natural gas boiler plant (EGU). This is similar to what we would require of a new power plant to determine if it meets the requirements of WAC 173-400-117, special protection requirements for federal Class I areas.

Basis for Decision

SNCR related changes and optimization study

As directed by BART order revision 1 and RCW 80.80.040, TransAlta installed an SNCR system to reduce nitrogen oxides emissions from the boilers. The installation was based on a design study by the system vendor, NALCO-NOx Mobotec.

NALCO/Mobotec took system measurements adequate to model the combustion process and optimize the locations of ammonia injection into the boilers. Modeling indicated that due to the configuration of the boilers, the lowest nitrogen oxides emission rate anticipated would be approximately 0.195 lb/MMBtu, assuming that modifications to optimize combustion in the fireboxes for Powder River Basin (PRB) sub-bituminous coal were completed.

Only Unit 2 (aka BW22) was modified for optimizing the combustion of PRB coals. These modifications, proposed in 2007, are known as the Flex Fuels Project. Unit 1 (aka BW21) is not modified and the company indicates that it is unlikely that the modifications will be installed on this unit.

The installed SNCR system includes three levels of injection lances in each boiler. The actual lances used depends on the firing rate. In general, to avoid making nitrogen oxides by oxidizing ammonia, the higher lances are used at high firing rates and the lower lances are used at low firing rates.

Ammonia is supplied by using urea. Urea is received as a 40 percent by weight urea solution. The urea is supplied to the lances via a variable speed pump that can supply up to 6 gallons per minute of the 40 percent urea solution to an eductor system. The water provides some cooling to the hot flue gas and carries the urea well beyond the lance ports allowing the nitrogen oxides reduction to occur over more volume of the boiler. At maximum injection rates, the system is capable of injecting ammonia at approximately the stoichiometric rate for the SNCR reaction at maximum heat input.

The modeling by NALCO/Mobotec on maximum reduction of nitrogen oxides has proven to be accurate in practice. Boiler/SNCR system modeling indicated that the maximum expected nitrogen oxides reduction would give an emission rate of 0.195 lb/MMBtu. Testing indicates that on Unit 2, the maximum reduction is to 0.19 lb/MMBtu and for Unit 1, 0.20 lb/MMBtu.

The initial reduction testing (reported in the September 2014 Optimization Study report) indicated that at low injection rates, the installed SNCR systems did not reduce nitrogen oxides beyond the levels being achieved by the use of the installed combustion controls. There was no significant nitrogen oxides reduction when the SNCR and combustion controls were both operated concurrently. The 2014 Optimization Study report indicated that the combination of SNCR and combustion control could achieve 0.21 lb nitrogen oxides/MMBtu. The current

nitrogen oxides emission limit has been set to the achievable emission level of 0.21 lb nitrogen oxides/MMBtu.

Ecology and Southwest Clean Air Agency required TransAlta to complete additional urea injection studies to determine the effects of injection rates of up to 6 gpm of 40 percent urea solution on nitrogen oxides reduction. Two test series on each boiler were done at 2 boiler operating rates:

- A series of 15-minute tests at an operating rate of 686 MW, gross, and
- A series of 15-minute and 4 hours tests were done at an operating rate of 600 MW, gross.

Conclusions of TransAlta's optimization study

In conclusion, the 2014 and 2016 test results indicate that the injection rates developed by NALCO/Mobotec as their optimum injection rates are very close to what has been demonstrated in the most current study. TransAlta presented rationale for why the emission limits in the BART order should not be adjusted downward.

TransAlta's rationale included a conclusion that the effectiveness of the SNCR system is affected by numerous operational parameters. The plant operators have control over some, while others are out of their control. Operating parameters include market driven operating rates, fuel blend, physical condition of the boiler and auxiliary equipment, fuel staging at burners, air flow distribution, burner tilt, soot blowing intervals, tube fouling, water wall slagging, and temperature in the convective pass of the boiler. TransAlta argued that because the uncertainties listed above, the BART order should not be adjusted.

Ecology's evaluation of the optimization data

Test results indicate that a small reduction in average nitrogen oxides emissions may be achievable. The actual reduction depends on several operating parameters. Ecology has evaluated the possibility of reducing the 30-day average limitation from 0.21 to 0.20 lb/MMBtu. We note that if both units operated at full rate for every hour of the year (i.e., the potential to emit), a 0.01 lb/MMBtu reduction equates to about 590 tons per year out of a potential to emit rate of 12,900 tons.

TransAlta's current permits require the operation of the SNCR system with urea injection and emission limits of 0.21 lb/MMBtu. The urea injection rate is creating ammonia slip. The ammonia generation is reacting with sulfur to create ammonia sulfate that is plating the surfaces in the ESPs. This creates conditions where the facility has to run at a reduced rate to continuing meeting emission requirements.

Neural Net

TransAlta initial proposal was to substitute the Neural Net to reduce the urea injection rate for each unit. Ecology and Southwest Clean Air Agency were willing to accept a lower urea injection rate, but wanted TransAlta to meet the short-term emission values of 0.18 lb/MMBtu for the unit with the Neural Net installed on it. In July 2019, TransAlta did not know the effectiveness of the Neural Net system. TransAlta requested a delay in agreement until more testing was done.

Southwest Clean Air Agency agreed to use enforcement discretion in 2019 on the urea injection rate while TransAlta was tuning the Neural Net. At the end of Calendar Year 2019, TransAlta had enough data to agree that the Neural Net system would be able to meet a 0.18 lb/MMBtu emission standard. TransAlta submitted a request to revise their BART order in January 2020.

The main elements of the request are to:

- Install the Neural Net on Unit 2.
- Change the emission standard on Unit 2 to 0.18 lb/MMBtu from 0.21 lb/MMBtu.
- Allow TransAlta to use all methods and options they have available in any combination to meet the 0.18 lb/MMBtu standard.
- Change the ammonia monitoring requirements to reflect both historical readings and the change in urea injection rates.
- Remove the testing of coal for nitrogen and sulfur content as the facility would have to meet emission standards regardless of the coal used.
- Remove the reporting requirements for the coal nitrogen and sulfur content, as the test would no longer be performed.
- Change the permit language to reflect the new MOA language.

Compliance schedule related changes

The requirements of Chapter 80.80 RCW that sets the compliance schedule simply requires that to continue operation as a baseload power plant after the schedule in RCW 80.80.040(3)(c) and the BART order, each boiler must meet the greenhouse gas emission performance standard in effect on the day after the compliance dates. The standard is set by Washington Department of Commerce based on the emissions of combined cycle combustion turbines offered for sale and installed in the United States. This standard is currently 970 pounds of greenhouse gases/MWh. The standard is currently under review by Commerce for potential revision downward.

To continue operation after 2020 and 2025 with emissions above the greenhouse gas emission performance standard would require the plant owners to take an enforceable limit that keeps

operations annually below a 60 percent capacity factor to avoid being classified as a baseload power plant under Chapter 80.80 RCW.

Ecology Analysis

The change in MOA language does not exclude the possibility that TransAlta could retrofit the facility to natural gas and continue operation. As the current BART order revision request does not address the future operation of the plant after 2025, any changes of this nature will require a separate action on the part of TransAlta. Until such time, it is assumed that TransAlta will cease all power generation activities by 2025.

Chapter 80.82 RCW was enacted in the same legislation that enacted special requirements for the Centralia Power Plant in Chapter 80.80 RCW. This law was drafted with the explicit understanding that the coal units would be decommissioned and demolished rather than repowered.

Ecology is aware that if TransAlta repowers the units on natural gas the visibility improvements anticipated by the current BART order and state implementation plan limits would not be met. Repowering would change the emission reduction used in determining the 2028 further progress goals for the nearby Class I Areas (Mt. Rainier and Olympic National Parks, and the Goat Rocks and Alpine Lakes Wilderness Areas) under the 2021 Regional Haze State Implementation Plan.

Proposed revision to emission limit in BART order

Ecology has determined that the small nitrogen oxides reduction resulting from lowering the emission limit to 0.18 lb/MMBtu nitrogen oxides will be slightly beneficial for the environment and reduce regional haze.

Ecology has determined that a change in ammonia monitor is applicable with the change from a mandatory urea injection rate to a rate dependent on meeting a specific nitrogen oxides emission standard. TransAlta historic ammonia emission sampling at their current urea injection rate has never indicated excessive ammonia emissions. A large part in this finding is that the SNCR is upstream in the emission pathway from the wet scrubber. Free ammonia in the exhaust stream would be absorbed by the slurry stream in the wet scrubber, as ammonia is hydrophilic. These two factors allow for modification of the ammonia monitoring.

Ecology will modify the BART order by:

- Lowering the nitrogen oxides emission standard on the second unit to 0.18 lb/MMBTU
- Requiring the unit that continues to provide coal-fired power production after 2020 to meet the 0.18 lb/MMBtu nitrogen oxides.

- Change the language to “permanently cease coal-fired power generation operations of one Boiler in 2020 and the other Boiler in 2025, which dates are prior to the 2035 end of their expected useful lives.” This to match the new language in the MOA.
- Remove the requirement to sample the coal for nitrogen and sulfur content.
- Remove the requirement to report to Southwest Clean Air Agency results of coal test.
- Removing the requirement a specific urea injection rate to allow TransAlta to inject urea as required (or if required) to meet the new emission standard.
- Change the requirement for ammonia emission monitoring to reflect monitoring when using a urea injection rate of greater than 1.5 gallons per minute.

Proposed revision to compliance schedule in BART order

Ecology is proposing to modify the compliance schedule for coal units BW21 and BW22 to permanently cease coal-fired power generation operations by 2020 and 2025. This much more closely matches the requirement in the underlying state law.

Any request to repower one or both units at the Centralia plant would require that the impact of repowering on visibility be modeled. The modeling would have to meet both the requirements of BART modeling and satisfy the requirement of WAC 173-400-117. Since TransAlta has not requested repowering at this time, this issue will not be addressed in this BART order revision.

References

TransAlta’s SNCR Optimization Study Report, September 20, 2014

TransAlta’s SNCR Optimization Study Report, August 15, 2016

Ecology’s SNCR Optimization Study Report acceptance letter dated November 7, 2016

Letter to Nancy Pritchett and Uri Papish, dated November 28, 2016

Southwest Clean Air Agency Regulatory Order #16-3202, issued December 13, 2016

TVW recording of March 15, 2011 House Environment Committee

Emission calculation

Appendix:
Response to Comment

From: Gent, Philip (ECY)
To: emissol@emissol.co
Subject: Response to submitted comment on TransAlta's proposed BART Revision
Date: Monday, July 27, 2020 4:39:00 PM

To whom it may concern,

You submitted a comment in regards to a proposed revision to the TransAlta Centralia Generation LLC ("TransAlta") Centralia Power Plant's Best Available Retrofit Technology (BART) Order on 5/19/2020 at 1420. Below you will find your submitted comment and Ecology's response to your comment.

Submitted Comment

"Neural Network (NN) is a complex method and requires substantial testing, development and validation in order to make it work for any given environment. We trust the applicant has gone thru its due process for this development and demonstration. It is imperative that sufficient evidence is provided, showing a certain NN algorithm has been developed and specifically shown to work for the said environment in the powerplant."

Response to comment

Thank you for your comment. TransAlta along with Neuendorfer and Griffin Open Systems installed a temporary neural network interfacing with the plant distributed control system starting July 8, 2019. The system had no control elements and was only learning and modeling the systems. Griffin engineers built a model to perform predictive modeling and started to collect tuning data.

The neural network interface continued to collect tuning data and in October, 2019, TransAlta Corporate approved and issued an authorization for expenditure for the entire neural network installation. The installation plan was to have the neural network operational the first week of November. The actual transition time took longer than planned and the commission date was extended to December 19, 2019.

The months of installation and modification of the neural network in order to reduce and optimize NOx emissions gave TransAlta the confidence to request a change to their existing BART Order. From the time of control system commissioning (December 19, 2019 being the day Griffin and Neuendorfer left the site) until the unit came offline for the spring outage on February 11, 2020, average NOx emissions have been below 0.18 lb/MMBtu. As the request to lower the NOx emission limit came from the Permittee (TransAlta), it is incumbent on TransAlta to meet the limits.

No change was made to the BART Order as a result of this comment.

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