



Mr. Vrajesh Patel  
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Michigan Department of Environmental Quality  
Air Quality Division  
P.O. Box 30473  
Lansing, MI 48909

November 14, 2008  
NTH Project No. 16-060556

**RE: Updated Application Support Materials  
Holland Board of Public Works  
Application 25-07**

Dear Mr. Patel:

Per your e-mail, dated October 24, 2008 and from recent meetings and discussions, we are forwarding certain updated application support materials as a result of recent correspondence with MDEQ. Specifically, we are including the following information:

1. Updated Table 6-6
2. Updated Table 3-14
3. Updated Table B-1
4. Updated Table B-5
5. Updated Tables B-16 through B-18
6. Updated Control Cost Spreadsheet for Acid Gases
7. Updated Emissions Spreadsheet Reflecting 100% Fuel Usage
8. Updated TAC Modeling Analysis
9. Updated Table B-25 for Cooling Tower Emissions
10. Spreadsheet Summarizing Hg Modeling Input Parameters
11. New Table B-26 for Road Emissions
12. 1 CD with Updated PM<sub>10</sub> Modeling to Include Roads and Cooling Towers
13. 1 CD with Updated Hg Deposition Modeling Files
14. Updated PM<sub>10</sub> Background Concentrations for years 2005 – 2007
15. ProUCL Results for Various Bituminous Coals

This information updates the netting analysis to adjust the “look-back” period to 2003-2007, provides a final emission spreadsheet based on 100% alternate fuel usage, updates the TAC modeling analysis, and details the control costs for a dry FGD to further control acid gases.

Further, based on other recent discussions with MDEQ regarding the potential chlorine content of the bituminous coals that HBPW proposes to consider as fuel for Unit 10 and a request that the MACT analysis address the worst-case fuel chlorine content, we are providing a revised MACT analysis for acid gases. The HCl limit proposed in the revised MACT is based upon a review of various bituminous coals contained in the USGS CoalQUAL database. The highest chlorine content was found in bituminous coals from Pennsylvania and ranged from 26 ppm to 2,828 ppm. For the MACT analysis, the 99% upper confidence on the mean (UCL) was used to set the MACT Floor. Specifically, HBPW is proposing a MACT Floor limit of 0.063 lb/MMBtu based upon use of the 99% UCL for Pennsylvania bituminous coal. Our analysis shows a control cost of \$15,614 per ton of acid gas removed using the 99% UCL for HCl.



Important to this analysis is the fact that this MACT limit and control cost represents the worst-case fuel that HBPW would consider or receive. As previously mentioned and discussed in the MACT determination, HBPW intends to burn a blend of fuels in Unit 10 and utilizing 100% of any given fuel is highly unlikely. Therefore, the control cost for acid gases is expected to be much higher than shown since lower chlorine fuels would be blended with this higher chlorine coal. See the following table for a summary of control costs based upon various coal blends.

**Table 1. Summary of Acid Gas Control Costs for Varying Bituminous Coal Blends.**

<b>Bituminous Coal Blends</b>			
<b>100% PA</b>	<b>80% PA / 20% CO</b>	<b>50% PA / 50% CO</b>	<b>100% CO</b>
<b>\$15,614</b>	<b>\$20,370</b>	<b>\$27,772</b>	<b>\$70,430</b>

If you have any further questions, please feel free to contact us at (517) 484-6900.

Sincerely,

NTH Consultants, Ltd.

Delbert Rector, P.E.  
Project Manager

Jeffrey P. Jaros  
Vice President

Attachments

cc: Mr. David Koster, Holland Board of Public Works  
Mr. Daniel Mitas, HDR|CB

DR/JPJ/mjb

**Table 6-6. PM<sub>10</sub> Emission Rates – Future Potential Emissions (NAAQS Modeling Analysis)**

<b>Point Sources</b>			<b>Potential Emission Rates (lbs/hr)</b>	<b>Modeled Emission Rates (gram/sec)</b>
New CFB Boiler Unit #10 Baghouse			21.63	2.72
Existing Unit #4 (ESP Control) - Based on ROP Limit			75.53	9.517E+00
Existing Unit #5 (ESP Control) - Based on ROP Limit			95.74	1.206E+01
Transfer/Crusher House Baghouse			0.34	0.043
Unit #10 Coal Storage Silos Baghouse			0.51	0.064
Unit #10 Limestone Bin Filter			0.17	0.021
Unit #10 Fly Ash Silo Vent			0.04	0.005
Cooling Tower			0.22	0.004
Roads			0.326	0.041
Unit #4 and #5 Existing Fly Ash Silo Vent			5.17E-04	6.51E-05
<b>Fugitive Area Sources</b>	<b>Source Area (m<sup>2</sup>)</b>	<b>Maximum Net Emission Rate (lbs/day)</b>	<b>Potential Emission Rates (lbs/hr)</b>	<b>Modeled Emission Rates (gram/sec/m<sup>2</sup>)</b>
Active Coal Pile <sup>1</sup>	8,803.0	35.42	1.476	2.112E-05
Compacted Coal Pile <sup>2</sup>	13,274.0	2.93	0.122	1.159E-06
<b>Fugitive Volume Sources</b>			<b>Potential Emission Rate (lbs/hr)</b>	<b>Modeled Emission Rate (gram/sec)</b>
Underground Loading Hopper			0.0142	1.785E-03

<sup>1</sup> The fugitive emission rate for the active coal pile is the sum of the maximum daily emissions for the coal drop from ship unloading, bull dozer activities, wind erosion on the active pile (normal daily activities) and wind erosion during shipments. The potential emission rate represents the maximum daily emissions at the increased coal usage rate proposed in this modification and takes into account the control strategies that will be implemented.

<sup>2</sup> The fugitive emission rate for the compacted coal pile is the maximum potential daily emission rate from wind erosion on the compacted area of the coal pile (normal daily activities). The emission rate represents the maximum daily emissions and takes into account post-modification control strategies that will be implemented



Revised November 14, 2008

Table 3-14. Emission Netting Analysis

Pollutant	Unit #3 (2-year Past Actual)	Unit #3 Past- Actual Fugitive	Unit #10 (New CFB Boiler)					NSPS		Cooling Tower (7 Cells)	Fugitive Emissions (Roads, Piles, Silos)	Net Change		Significant Emission Rates
	tpy	tpy	lb/ MW <sub>hr</sub> <sub>gross</sub>	lb/ MMBtu <sup>1</sup>	lb/ hr	lb/ yr	tpy	lb/ MW <sub>hr</sub> <sub>gross</sub>	lb/ MMBtu	tpy	tpy	tpy	lb/ yr	tpy
PM	10.13	2.48		0.011	9.52		41.68		0.015	0.95	12.51	42.53		25
PM <sub>10</sub> /PM <sub>2.5</sub>	10.13	0.66		0.025	21.63		94.72		0.015	0.95	6.47	91.35		15
NO <sub>x</sub>	425.82		1.0	0.09	78.0		341.64	1.0				-84.18		40
SO <sub>2</sub>	531.99		1.4	0.126	109.2		478.30	1.4				-53.69		40
CO	10.58			0.15	129.75		568.31					557.73		100
VOC	0.0041			0.0036	3.11		13.64					13.64		40
Lead	0.0088			2.17E-05	0.019		0.082					0.073		0.6
H <sub>2</sub> SO <sub>4</sub>	32.69			0.006	5.28		23.11					-9.58		7
HF	4.82			0.0017	1.47		6.44					1.62		3
Mercury	0.00093		7.80E-06	7.03E-07	6.08E-04	5.33	2.66E-03	20E-06				0.002	3.47	

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PSD Applicability

Table B-1. Netting Demonstration

Pollutant	2-year Past Actual		New CFB Boiler						NSPS		Net Change		Significance Level
	Unit #3		Unit #10						lb/MW <sub>hr</sub> <sub>gross</sub>	lb/MMBTU	tpy	lb/yr	tpy
	tpy	Fugitives (tpy)	lb/MW <sub>hr</sub> <sub>gross</sub>	lb/MMBTU	lb/hr	lb/yr	tpy	Fugitives (tpy)					
PM <sup>1</sup>	10.13	2.48		0.011	9.52		41.68	13.46		0.015	42.53		15
PM <sub>10</sub> /PM <sub>2.5</sub>	10.13	0.66		0.025	21.63		94.72	7.42		0.015	91.35		25
NO <sub>x</sub>	425.73		1.00	0.09	78.00		341.64		1.0		-84.09		40
SO <sub>2</sub>	531.99		1.40	0.126	109.20		478.30		1.4		-53.69		40
H <sub>2</sub> SO <sub>4</sub>	32.69			6.10E-03	5.28		23.11				-9.58		7
CO	10.58			0.150	129.75		568.31				557.73		100
VOC	0.0041			0.005	4.33		18.94				18.94		40
HF	4.82			0.0017	1.47		6.44				1.62		3
Lead	0.0088			2.17E-05	0.02		0.08				0.07		0.6
Mercury <sup>2</sup>	0.00093		7.80E-06	7.03E-07	6.08E-04	5.33	2.66E-03				0.002	3.47	

<sup>1</sup> The PM emission factor for Unit #10 is based on the MACT limit using PM as a surrogate for non-mercury metal HAPs.

<sup>2</sup> The mercury emission factor for Unit #10 is based on the MACT limit.

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Baseline Emission Rates

Table B-5. Baseline Emission Rates

Emission	2000				2001				2002				2003				2004				2005				2006				2007				
	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	
PM <sub>10</sub> Total	3.2	8.64	38.04	49.88	2.96	8.26	39.29	50.51	3.35	7.5	32.5	43.25	5.93	31.02	42.87	79.82	4.28	26.53	36.79	67.60	6.77	31.00	35.42	73.19	13.49	1.35	2.69	17.53	2.38	6.83	2.80	12.01	
NO <sub>x</sub>	392.11	725.64	464.09	1581.84	362.1	694.36	496.31	1552.81	410.3	625.8	417.2	1453.34	370.8	722.6	499.7	1593.02	267.5	618.02	419.11	1304.64	422.5	722.00	383.10	1527.60	429.0	532.31	319.30	1280.58	412.0	557.25	382.35	1351.62	
SO <sub>2</sub>	589.71	1054.16	1437.92	3081.79	581.1	1076.55	1406.49	3064.17	680.1	1002.5	1273.2	2955.82	634.1	1194.9	1582.4	3411.44	381.8	851.90	1299.10	2532.75	536.1	885.41	874.50	2296.01	471.5	564.87	792.00	1828.35	592.5	774.13	784.70	2151.33	
H <sub>2</sub> SO <sub>4</sub>	30.47			30.47	32.14			32.14	33.24			33.24	30.03			30.03	28.32			28.32	44.72			44.72	33.35				33.35	32.02			32.02
CO	8.82	15.75	19.48	44.05	8.38	15.54	19.83	43.75	9.52	14.0	16.8	40.31	8.65	16.1	20.1	44.91	6.52	14.64	17.40	38.56	10.13	16.66	17.00	43.79	10.65	12.79	14.91	38.35	10.51	13.79	15.49	39.79	
Lead	0.010	0.01	0.02	0.04	0.007	0.01	0.02	0.04	0.008	0.01	0.01	0.03	0.0072	0.01	0.02	0.04	0.000	0.01	0.01	0.02	0.008	0.01	0.01	0.04	0.009	0.01	0.01	0.03	0.009	0.01	0.01	0.03	
HF	4.03			4.03	3.84			3.84	4.35			4.35	3.92			3.92	2.97			2.97	4.60			4.60	4.84				4.84	4.80			4.80
Total VOCs	0.002			0.002	0.001			0.001	0.000			0.000	0.000			0.000	0.000			0.000	0.0165			0.0165	0.000				0.000	0.000			0.000
Mercury	8.54E-04			8.54E-04	7.89E-04			7.89E-04	8.94E-04			8.94E-04	8.07E-04	1.98E-03	1.15E-03	0.0039	5.83E-04	1.70E-03	9.80E-04	0.0033	9.20E-04	2.00E-03	9.46E-04	0.0039	9.35E-04	1.00E-03	7.96E-03	0.0099	8.98E-04	5.40E-04	8.33E-04	0.0023	

Table B-6. 24-Month Average Emission Rates

Emission	2000-2001 Average				2001-2002 Average				2002-2003 Average				2003-2004 Average				2004-2005 Average				2005-2006 Average				2006-2007 Average		Max 24-month						
	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)	Unit 3 (tons)	Unit 4 (tons)	Unit 5 (tons)	Total (tons)					
PM <sub>10</sub> Total	3.08	8.45	38.67	50.19	3.16	7.86	35.87	46.89	4.64	19.24	37.66	61.54	5.10	28.78	39.83	73.71	5.53	28.77	36.11	70.40	10.13	16.18	19.06	45.36	7.94	4.09	2.75	14.77	10.13	10.13	73.71		
NO <sub>x</sub>	377.13	710.00	480.20	1567.33	386.22	660.09	456.78	1039.57	390.52	674.21	458.45	1523.18	319.13	670.31	459.39	1448.83	345.00	670.01	401.11	1416.12	425.73	627.16	351.20	1404.09	420.50	544.78	350.83	1316.10	425.73	425.73	1567.33		
SO <sub>2</sub>	585.42	1065.36	1422.21	3072.98	630.62	1039.53	1339.85	1979.17	657.13	1098.70	1427.81	3183.63	507.95	1023.39	1440.76	2972.10	458.93	868.66	1086.80	2414.38	503.79	725.14	833.25	2062.18	531.99	669.50	788.35	1989.84	531.99	531.99	3183.63		
H <sub>2</sub> SO <sub>4</sub>	31.30			31.30	32.69			32.69	31.63			31.63	29.17			29.17	36.52			36.52	39.04			39.04	32.69				32.69	39.04			39.04
CO	8.60	15.65	19.66	43.90	8.95	14.77	18.31	42.16	9.09	15.07	18.46	42.61	7.58	15.39	18.76	41.73	8.32	15.65	17.20	41.17	10.39	14.73	15.96	41.07	10.58	13.29	15.20	39.07	10.58	10.58	43.90		
Lead	0.009	0.010	0.020	0.04	0.007	0.010	0.015	0.02	0.008	0.010	0.015	0.03	0.004	0.010	0.015	0.03	0.004	0.012	0.012	0.03	0.008	0.013	0.012	0.03	0.009	0.011	0.012	0.03	0.009	0.011	0.012	0.03	
HF	3.937			3.937	4.093			4.093	4.133			4.133	3.444			3.444	3.784			3.784	4.721			4.721	4.820				4.820	4.820			4.820
Total VOCs	0.001			0.001	0.000			0.000	0.004			0.004	0.000			0.000	0.000			0.000	0.0165			0.0165	0.000				0.000	0.000			0.000
Mercury	8.22E-04			8.22E-04	8.42E-04			8.42E-04	8.51E-04	1.98E-03	1.15E-03	0.0039	6.95E-04	1.84E-03	1.06E-03	0.0039	7.51E-04	1.85E-03	9.63E-04	0.0033	9.27E-04	1.50E-03	9.45E-04	0.0039	9.16E-04	7.70E-04	4.40E-03	0.0099	8.98E-04	5.40E-04	8.33E-04	0.0023	

NO <sub>x</sub> Emission Factors from TEST run:	MMBtu/yr								MMBtu/hr							
	2000	2001	2002	2003	2004	2005	2006	2007	2000	2001	2002	2003	2004	2005	2006	2007
TPY Coal	902252.2	833632.4	944222.2	852963.7	615548	972090.1	987656.35	948242.35	114.0	120.3	124.4	112.4	106.0	167.4	124.8	119.8
0.847 lb/MMBtu	35075.7	33396.1	37784.0	34094.0	25794.0	40007.0	42096.0	41725.0								
Coal Only	382.10	353.04	399.88	361.23	260.68	411.68	418.27	401.58								
0.878 lb/MMBtu	396.09	365.96	414.51	374.45	270.23	426.75	433.58	416.28								
0.881 lb/MMBtu	397.44	367.22	415.93	375.73	271.15	428.21	435.06	417.70								
<b>Average</b>	0.869 lb/MMBTU	391.88	362.07	410.11	370.47	267.35	422.21	428.97	411.85							
Oil Only	TPY								TPY							
	0.23	0.07	0.18	0.285	0.155	0.286	0.286	0.17	392.11	362.14	410.29	370.76	267.51	422.50	429.26	412.02
Hg Emission Factors from TEST Run:	2.51E-06 lb/MMBtu	1.13E-03	1.05E-03	1.18E-03	1.07E-03	7.73E-04	1.22E-03	1.24E-03	1.19E-03							
	1.52E-06 lb/MMBtu	6.86E-04	6.34E-04	7.18E-04	6.48E-04	4.68E-04	7.39E-04	7.51E-04	7.21E-04							
	1.65E-06 lb/MMBtu	7.44E-04	6.88E-04	7.79E-04	7.04E-04	5.08E-04	8.02E-04	8.15E-04	7.82E-04							
	1.89E-06 lb/MMBTU	8.54E-04	7.89E-04	8.94E-04	8.07E-04	5.83E-04	9.20E-04	9.35E-04	8.98E-04							

NOTE: HF Emissions are calculated based upon an emission factor of 0.23 lb/ton, consistent with recommendations by USEPA. Details of this emission factor are found in EPA 745-B-00-004, EPCRA Section 313 Guidance for calculating HF emissions for TRI. Netting analysis look-back period adjusted to 2003-2007.

**Holland Board of Public Works Fugitives  
Summary and Working Emissions for 150-day Coal Supply  
Revised November 3, 2008**

**Table B-15. New Transfer/Crusher House Baghouse**

Baghouse (scfm)	10000	
Baghouse (gr /scf)	<b>0.004</b>	<b>BACT</b>
Baghouse Emissions (lb /hr)	0.34	
Operating Time (hr /day)	<b>24</b>	<b>NTH</b>
Operating Time (day/ year)	<b>365</b>	
Baghouse Emissions (lb/day)	8.23	
Baghouse Emissions (tpy)	1.50	

**Table B-16. Unit 10 Storage Silos (3) with Baghouse Control**

Flow Rate of Baghouse (scfm)	15000	
Baghouse (gr /scf)	<b>0.004</b>	<b>BACT</b>
Emissions (lb /hr)	0.51	
Operating Time (hr /day)	<b>24</b>	<b>NTH</b>
Operating Time (day/ year)	<b>365</b>	
Baghouse Emissions (lb/day)	12.34	
Emissions (tpy)	2.25	

**Table B-17. Unit 10 Limestone Feed Storage Baghouse**

Flow Rate of Baghouse (scfm)	5000	
Baghouse (gr /scf)	<b>0.004</b>	<b>BACT</b>
Emissions (lb /hr)	0.17	
Operating Time (hr /day)	<b>24</b>	<b>NTH</b>
Operating Time (day/ year)	<b>365</b>	
Baghouse Emissions (lb/day)	4.11	
Emissions (tpy)	0.75	

**Table B-18. New Fly Ash Silo Baghouse (Unit 10 Only)**

Flow Rate of Baghouse (scfm)	1100	
Baghouse (gr /scf)	<b>0.004</b>	<b>BACT</b>
Emissions (lb /hr)	0.04	
Operating Time (hr /day)	<b>24</b>	<b>NTH</b>
Operating Time (day/ year)	<b>365</b>	
Baghouse Emissions (lb/day)	0.91	
Emissions (tpy)	0.17	

**Table B-19. Existing Fly Ash Bin Filter (Units 4 & 5)**

Size of Silo (ft <sup>3</sup> )	<b>8,482</b>	20 ft diam by 27 ft tall storage capacity from MAERS
Density of ash (lb/ft <sup>3</sup> )	<b>37</b>	
Bin Filter (gr /scf)	<b>0.02</b>	
Bin Filter Emissions (lb /hr)	0.00052	
Operating Hours	<b>24</b>	
Bin Filter Emissions (lb/day)	0.0124	
Bin Filter Emissions (tpy)	0.0023	

**Appendix C**  
Control Technology Cost Basis for Dry Flue Gas Desulfurization for Acid Gas Control  
One (1) 78 MW Circulating Fluidized Bed Boiler - Bituminous Coal (1,005 ppm Chloride Case)  
**REVISED: November 10, 2008**

Cost Item	Cost Description	Cost Factor	Cost 2007 \$
<b>DIRECT CAPITAL INVESTMENTS (DCI)</b>			
	Buildings		\$ 524,000
	Site Preparation		\$ 34,500
	Installation Cost		\$ 3,910,000
	Purchased Equipment		\$ 9,340,000
	Taxes on Real Property Only	No taxes applied to Production Equipment	\$ 35,700
	<b>TOTAL DCI</b>		<b>\$ 13,840,000</b>
<b>INDIRECT CAPITAL INVESTMENT (ICI)</b>			
	Engineering and Proj Management		\$ 824,000
	Construction & Field Expenses		\$ 922,000
	Contractor Fees	Included with Field Expense	
	Start-up	Included with Field Expense	
	Performance Test	Included with Field Expense	
	Contingencies		\$ 3,120,000
	<b>TOTAL ICI</b>		<b>\$ 4,866,000</b>
<b>TOTAL CAPITAL INVESTMENT (TCI)</b>	DCI + ICI		<b>\$ 18,706,000</b>
<b>DIRECT OPERATING COSTS (DOC)</b>			
	Labor		
	- Operator	2 equivalent operators @ \$115,000/year	\$ 230,000
	- Supervisory	20% of Operator Labor Cost	\$ 46,000
	- Maintenance	1 technician @ \$115,000/year	\$ 115,000
	Materials		
	- Maintenance Materials	3.5% of DCI	\$ 484,400
	- Reagent (Lime)	\$70 per ton	\$ 44,600
	- Limestone	NA	\$ -
	- Water	650 gpm	\$ 2,100
	Utilities		\$ -
	- Electricity	450 kW @ \$60/MWh	\$ 237,000
	- Fuel		\$ -
	- Pressure Drop	4.5 " pressure drop	\$ 100,000
	- Waste Disposal	Incremental Waste Solids, 1,400 tpy at \$12/ton	\$ 16,500
	<b>TOTAL DOC</b>		<b>\$ 1,275,600</b>
<b>INDIRECT OPERATING COSTS (IOC)</b>			
	Overhead	60% of Operator labor & Maintenance	\$ 234,600
	Property Taxes	Applicable to Project - Assume \$0 - Conservative	\$ -
	Insurance	1% of TCI	\$ 187,060
	Administrative Charges	2% of TCI	\$ 374,120
	Capital Recovery	20 years; 7% interest = 0.0944 CRF	\$ 1,765,846
	<b>TOTAL IOC</b>		<b>2,561,626</b>
<b>RECOVERY CREDITS (RC)</b>			
	Materials		-
	SO2 Market Credits	320.5 tpy based on 67% removal @ \$400/ton	\$ (128,200)
	<b>TOTAL RC</b>		<b>\$ (128,200)</b>
<b>TOTAL ANNUALIZED COSTS (TAC)</b>	DOC + IOC - RC		<b>\$ 3,709,026</b>
<b>HF EMISSIONS</b>			
	80% Control	0.0017 lb/MMBtu	6.44
	98% Control	0.0002 lb/MMBtu	0.76
	<b>TOTAL REDUCTION</b>		<b>5.68</b>
	<b>Cost-Effectiveness</b>	\$ per ton of HF removed	<b>\$ 652,647</b>
<b>HCl EMISSIONS</b>			
	30% Control	0.063 lb/MMBtu	238.69
	98% Control	0.0018 lb/MMBtu	6.82
	<b>TOTAL REDUCTION</b>		<b>231.87</b>
	<b>Cost-Effectiveness</b>	\$ per ton of HCl removed	<b>\$ 15,996</b>
	<b>Cost Effectiveness - Total Acid Gas</b>	\$ per ton of Acid Gas Removed	<b>\$ 15,614</b>







**Holland BPW - New CFB Boiler (Unit #10)**  
**Toxic Air Contaminant Modeling Results**  
**REVISED 11/14/2008**

Toxic Air Contaminants	CAS	Potential Emission Rate (lb/hour)	Potential Emission Rate (gram/sec)	ITSL (ug/m3)	Averaging Period	Ambient Impact (ug/m3)	% of ITSL	IRSL (ug/m3)	Ambient Impact (ug/m3)	% of IRSL
Acetaldehyde	75070	8.26E-01	1.04E-01	9	24 hour	3.70E-02	0.41%	0.5	4.19E-03	0.84%
Acetophenone	98862	8.48E-04	1.07E-04	490	8 hour	8.75E-05	0.00%			
Acrolein	107028	7.47E-01	9.42E-02	0.02	Annual	3.79E-03	18.95%			
Acrolein	107028	7.47E-01	9.42E-02	5	1 hour	1.08E-01	2.15%			
Antimony	7440360	7.86E-03	9.90E-04	0.2	24 hour	3.52E-04	0.18%			
Arsenic	7440382	2.32E-02	2.92E-03					0.0002	1.18E-04	58.76%
Benzene	71432	4.18E+00	5.26E-01	30	24 hour	1.87E-01	0.62%	0.1	2.12E-02	21.19%
Benzyl chloride	100447	3.96E-02	4.98E-03		Annual			0.02	2.01E-04	1.00%
Beryllium	7440417	1.19E-03	1.50E-04	0.02	24 hour	5.32E-05	0.27%	0.0004	6.02E-06	1.50%
Bis(2-Ethylhexyl)phthalate	117817	7.46E-01	9.40E-02					0.2	3.78E-03	1.89%
Bromoform	75252	2.20E-03	2.78E-04					0.9	1.12E-05	0.00%
Bromomethane (Methyl bromide)	74839	1.49E-02	1.88E-03	5	24 hour	6.69E-04	0.01%			
Cadmium	7440439	1.00E-02	1.26E-03					0.0006	5.07E-05	8.46%
Carbon disulfide	75150	7.35E-03	9.26E-04	700	24 hour	3.29E-04	0.00%			
Carbon tetrachloride	56235	4.48E-02	5.64E-03					0.07	2.27E-04	0.32%
Chlorine	7782505	7.86E-01	9.90E-02	15	8 hour	8.11E-02	0.54%			
Chlorobenzene	108907	3.28E-02	4.14E-03	70	24 hour	1.47E-03	0.00%			
Chloroform	67663	3.64E-02	4.58E-03					0.4	1.84E-04	0.05%
Chromium, total	7440473	2.09E-02	2.63E-03	0.1	Annual	1.06E-04	0.11%			
Chromium, hexavalent	18540299	4.47E-03	5.63E-04	0.1	24 hour	2.00E-04	0.20%	8.30E-05	2.26E-05	27.28%
Cobalt	7440484	6.47E-03	8.15E-04	0.2	8 hour	6.67E-04	0.33%			
Cumene	98828	3.00E-04	3.77E-05	400	24 hour	1.34E-05	0.00%			
Cyanide	57125	1.41E-01	1.78E-02	50	1 hour	2.03E-02	0.04%			
1,4-Dichlorobenzene	106467	4.37E+00	5.50E-01	800	24 hour	1.96E-01	0.02%	0.14	2.21E-02	15.81%
1,2-Dichloroethane (Ethylene dichloride)	107062	2.88E-02	3.63E-03					0.04	1.46E-04	0.37%
Dichloromethane (Methylene chloride)	75092	2.88E-01	3.63E-02					2	1.46E-03	0.07%
1,2-Dichloropropane (Propylene dichloride)	78875	3.28E-02	4.14E-03	4	24 hour	1.47E-03	0.04%			
Dimethyl sulfate	77781	2.71E-03	3.42E-04	0.5	8 hour	2.80E-04	0.06%			
2,4-Dinitrophenol	51285	1.79E-04	2.26E-05	7	24 hour	8.02E-06	0.00%			
2,4-Dinitrotoluene	121142	1.58E-05	1.99E-06	2	8 hour	1.63E-06	0.00%	0.009	8.03E-08	0.00%
Ethylbenzene	100414	3.08E-02	3.89E-03	1000	24 hour	1.38E-03	0.00%	3	1.56E-04	0.01%
Ethylchloride (Chloroethane)	75003	2.37E-02	2.99E-04	10000	24 hour	1.06E-04	0.00%			
Ethylene dibromide (Dibromoethane)	106934	2.88E-04	3.63E-05	9	24 hour	1.29E-05	0.00%	0.002	1.46E-06	0.07%
Formaldehyde	50000	4.38E+00	5.51E-01					0.08	2.22E-02	27.75%
Hexane	110543	3.79E-03	4.77E-04	700	24 hour	1.70E-04	0.00%			
Hydrogen chloride (HCl)	7647010	5.45E+01	6.87E+00	20	24 hour	2.44E+00	12.21%			
Hydrogen fluoride (HF)	7664393	1.47E+00	1.85E-01	26	1 hour	2.12E-01	0.81%			
Isophorone	78591	3.28E-02	4.13E-03	280	1 hour	4.72E-03	0.00%	3.7	1.66E-04	0.00%
Manganese	7439965	1.59E-02	2.01E-03	0.05	24 hour	7.13E-04	1.43%			
Methyl chloride (Chloromethane)	74873	3.00E-02	3.77E-03	90	24 hour	1.34E-03	0.00%	1.6	1.52E-04	0.01%
Methyl hydrazine	60344	9.61E-03	1.21E-03	0.03	24 hour	4.30E-04	1.43%	0.0087	4.87E-05	0.56%
Methyl methacrylate	80626	1.13E-03	1.42E-04	700	24 hour	5.06E-05	0.00%			
Methyl tert butyl ether	1634044	1.98E-03	2.49E-04	3000	24 hour	8.86E-05	0.00%			
Nickel	7440020	3.28E-02	4.14E-03					0.0042	1.66E-04	3.96%
4-Nitrophenol	100027	1.09E-04	1.38E-05	0.7	Annual	5.55E-07	0.00%			
Pentachlorophenol	87865	5.07E-05	6.39E-06	100	24 hour	2.27E-06	0.00%	0.03	2.57E-07	0.00%
Phenol	108952	5.07E-02	6.39E-03	600	1 hour	7.30E-03	0.00%			
Phosphorus	7723140	5.72E-01	7.21E-02	1	8 hour	5.90E-02	5.90%			
Propionaldehyde (Propanal)	123386	6.07E-02	7.65E-03	8	24 hour	2.72E-03	0.03%			
Selenium	7782492	7.35E-02	9.26E-03	2	8 hour	7.59E-03	0.38%			
Styrene	100425	1.89E+00	2.38E-01	1000	24 hour	8.47E-02	0.01%	1.7	9.59E-03	0.56%
1,1,1-Trichloroethane (Methyl chloroform)	71556	3.08E-02	3.89E-03	6000	24 hour	1.38E-03	0.00%			
Tetrachloroethylene (Perchloroethylene)	127184	3.78E-02	4.76E-03					1.7	1.92E-04	0.01%
Toluene	108883	9.15E-01	1.15E-01	5000	24 hour	4.10E-02	0.00%			
Trichloroethene (Trichloroethylene)	79016	2.98E-02	3.76E-03					0.6	1.51E-04	0.03%
2,4,6-Trichlorophenol	88062	2.19E-05	2.76E-06					0.3	1.11E-07	0.00%
Vinyl acetate	108054	4.30E-03	5.41E-04	200	24 hour	1.92E-04	0.00%			
Vinyl Chloride	75014	1.79E-02	2.26E-03	100	24 hour	8.02E-04	0.00%	0.11	9.08E-05	0.08%
Xylenes	1330207	2.70E-02	3.40E-03	100	24 hour	1.21E-03	0.00%			
o-Xylene	95476	2.49E-02	3.13E-03	100	24 hour	1.11E-03	0.00%			
<b>Polycyclic Organic Matter (POMs)</b>										
2-Chloroacetophenone	532274	3.96E-04	4.98E-05	0.03	24 hour	1.77E-05	0.06%			
2-Chloronaphthalene	91587	2.39E-06	3.01E-07	0.1	Annual	1.21E-08	0.00%			
2-Methylnaphthalene	91576	2.55E-03	3.21E-04	10	Annual	1.29E-05	0.00%			
3-Methylcholanthrene	56495	1.18E+00	1.49E-01	0.1	Annual	6.00E-03	6.00%			
5-Methyl chrysene	3697243	2.88E-04	3.63E-05	0.1	Annual	1.46E-06	0.00%			
Acenaphthene	83329	9.05E-04	1.14E-04	210	24 hour	4.06E-05	0.00%			
Acenaphthylene	208968	4.97E-03	6.27E-04	35	24 hour	2.23E-04	0.00%			
Anthracene	120127	2.98E-03	3.76E-04	1000	24 hour	1.34E-04	0.00%			
Benz(a)anthracene <sup>1</sup>	56553	2.88E-05	3.63E-06		Annual					
Benzo(a)pyrene <sup>1</sup>	50328	2.59E-03	3.26E-04					0.0005	1.31E-05	2.62%
Benzo(b)fluoranthene	205992	2.88E-05	3.63E-06	5	Annual	1.46E-07	0.00%			
Benzo(b,k)fluoranthene		2.88E-06	3.63E-07	5	Annual	1.46E-08	0.00%			
Benzo(b,j,k)fluoranthene		2.88E-04	3.63E-05	0.1	Annual	1.46E-06	0.00%			
Benzo(e)pyrene	192972	2.88E-04	3.63E-05	0.1	Annual	1.46E-06	0.00%			



**Holland BPW - New CFB Boiler (Unit #10)  
Toxic Air Contaminant Modeling Results  
REVISED 11/14/2008**

Benzo(g,h,i)perylene	191242	2.88E-04	3.63E-05	12	24 hour	1.29E-05	0.00%			
Benzo(j,k)fluoranthene		2.88E-04	3.63E-05	<b>0.1</b>	Annual	1.46E-06	0.00%			
Benzo(k)fluoranthene <sup>1</sup>	205823	2.88E-06	3.63E-07		Annual					
Biphenyl	92524	2.88E-04	3.63E-05	15	8 hour	2.97E-05	0.00%			
Carbazole	86748	1.79E-03	2.26E-04					0.02	9.08E-06	0.05%
Chrysene <sup>1</sup>	218019	2.88E-07	3.63E-08		Annual					
Crotonaldehyde	4170303	9.85E-03	1.24E-03	9	1 hour	1.42E-03	0.02%			
Dibenz(a,h)anthracene <sup>1</sup>	53703	9.05E-06	1.14E-06	<b>0.1</b>	Annual	4.59E-08	0.00%			
Fluoranthene	206440	1.59E-03	2.01E-04	140	24 hour	7.13E-05	0.00%			
Fluorene	86737	3.38E-03	4.26E-04	140	24 hour	1.52E-04	0.00%			
Indeno(1,2,3,c,d)pyrene <sup>1</sup>	193395	2.88E-04	3.63E-05	<b>0.1</b>	Annual	1.46E-06	0.00%			
Naphthalene	91203	1.73E+00	2.18E-01	3	24 hour	7.74E-02	2.58%	0.08	8.76E-03	10.95%
Phenanthrene	85018	6.96E-03	8.77E-04	0.1	Annual	3.53E-05	0.04%			
Pyrene	129000	3.68E-03	4.64E-04	100	24 hour	1.65E-04	0.00%			
Total Dioxin/Furan	1746016 & 132649	1.14E-07	1.44E-08					2.00E-08	5.79E-10	2.90%
<b>Polychlorinated Biphenyls (PCBs)</b>										
Monochlorobiphenyl	27323188	2.19E-07	2.76E-08	<b>0.1</b>	Annual	1.11E-09	0.00%			
Decachlorobiphenyl	2051243	2.69E-07	3.38E-08	<b>0.1</b>	Annual	1.36E-09	0.00%			
Dichlorobiphenyl	several isomers	7.36E-07	9.27E-08	<b>0.1</b>	Annual	3.73E-09	0.00%			
Heptachlorobiphenyl	28655712	6.57E-08	8.27E-09	<b>0.1</b>	Annual	3.33E-10	0.00%			
Hexachlorobiphenyl	26601649	5.47E-07	6.89E-08	<b>0.1</b>	Annual	2.77E-09	0.00%			
Pentachlorobiphenyl	several isomers	1.19E-06	1.50E-07	<b>0.1</b>	Annual	6.05E-09	0.00%			
Tetrachlorobiphenyl	several isomers	2.49E-06	3.13E-07	<b>0.1</b>	Annual	1.26E-08	0.00%			
Trichlorobiphenyl	several isomers	2.59E-06	3.26E-07	<b>0.1</b>	Annual	1.31E-08	0.00%			
<b>Carcinogenic PAHs</b>		2.92E-03	3.67E-04					0.0005	1.48E-05	2.96%
<b>Total PCBs</b>		8.10E-06	1.02E-06	<b>0.1</b>	Annual	4.11E-08	0.00%			
<b>Total POMs</b>		2.91E+00	3.67E-01	<b>0.1</b>	Annual	1.48E-02	14.76%			
<b>Non-HAP Toxic Air Contaminants</b>										
Acetone	67641	1.89E-01	2.38E-02	5900	8 hour	0.01951122	0.00%			
Aluminum	7429905	3.46E-02	4.35E-03	<b>0.1</b>	Annual	0.00017527	0.18%			
Barium	7440393	1.69E-01	2.13E-02	5	8 hour	1.75E-02	0.35%			
Benzaldehyde	100527	8.46E-04	1.07E-04					0.4	4.29E-06	0.00%
Benzoic acid	65850	4.68E-05	5.89E-06	<b>0.1</b>	Annual	2.37E-07	0.00%			
Calcium	7440702	9.09E-02	1.15E-02	<b>0.1</b>	Annual	4.61E-04	0.46%			
2-Chlorophenol	95578	2.39E-05	3.01E-06	18	24 hour	1.07E-06	0.00%			
Copper	7440508	4.87E-02	6.14E-03	2	8 hour	5.03E-03	0.25%			
1,2-Dibromoethene	540498	5.47E-02	6.89E-03	<b>0.1</b>	Annual	2.77E-04	0.28%			
Dichlorodifluoromethane	75718	6.96E-03	8.77E-04	49500	8 hour	7.19E-04	0.00%			
Iron	7439896	9.85E-01	1.24E-01	<b>0.1</b>	Annual	4.99E-03	4.99%			
Isobutyraldehyde	78842	1.19E-02	1.50E-03	160	24 hour	5.35E-04	0.00%			
Magnesium	7439954	6.22E-01	7.83E-02	100	8 hour	6.42E-02	0.06%			
Methyl ethyl ketone	78933	2.20E-02	2.78E-03	5000	24 hour	9.88E-04	0.00%			
Molybdenum	7439987	2.09E-03	2.63E-04	<b>0.1</b>	Annual	1.06E-05	0.01%			
2-Nitrophenol	88755	2.39E-04	3.01E-05	<b>0.1</b>	Annual	1.21E-06	0.00%			
Perylene	198550	5.17E-07	6.52E-08	<b>0.1</b>	Annual	2.62E-09	0.00%			
Potassium	7440097	3.88E-01	4.89E-02	<b>0.1</b>	Annual	1.97E-03	1.97%			
Silicon	7440213	5.82E-02	7.33E-03	<b>0.1</b>	Annual	2.95E-04	0.30%			
Silver	7440224	1.69E-02	2.13E-03	0.1	8 hour	1.75E-03	1.75%			
Sodium	7440235	3.58E-01	4.51E-02	<b>0.1</b>	Annual	1.82E-03	1.82%			
Strontium	7440246	5.28E+00	6.65E-01	<b>0.1</b>	Annual	2.68E-02	26.76%			
Sulfuric Acid	7664939	9.95E-03	1.25E-03	10	8 hour	1.03E-03	0.01%			
Tin	7440315	2.29E-02	2.88E-03	20	8 hour	2.36E-03	0.01%			
Titanium	7440326	1.99E-02	2.51E-03	<b>0.1</b>	Annual	1.01E-04	0.10%			
o-Tolualdehyde	529204	7.16E-03	9.02E-04	<b>0.1</b>	Annual	3.63E-05	0.04%			
p-Tolualdehyde	104870	1.09E-02	1.38E-03	440	24 hour	4.90E-04	0.00%			
Trichlorofluoromethane	75694	4.08E-02	5.14E-03	56200	1 hour	5.87E-03	0.00%			
Vanadium	7440622	1.38E-03	1.74E-04	<b>0.1</b>	Annual	7.01E-06	0.01%			
Yttrium	7440655	2.98E-04	3.76E-05	<b>0.1</b>	Annual	1.51E-06	0.00%			
Zinc (as ZnO)	7440666	4.18E-01	5.26E-02	50	8 hour	4.31E-02	0.09%			

**Note: An ITSL of 0.1 that is red bolded is a default screening level per AQD air toxics policy**

<sup>1</sup> The screening level for the seven carcinogenic polycyclic aromatic hydrocarbons (PAHs) can be determined by methods utilizing the estimated order of potential potency

# Holland Board of Public Works

## Cooling Tower Summary

**Table B-25. Cooling Tower**

Pumping rate of recirculation pumps (gal/min)	70,000
Flow of cooling water (lb/hr)	34,986,000.0
TDS of blowdown (mg/l or ppmw)	<b>4000</b>
Flow of dissolved solids (lb/hr)	139,944.0
Fraction of flow producing drift <sup>1</sup>	0.31
Control efficiency of drift eliminators	0.0005%
Particulate emissions from tower (lb/hr)	0.22
Particulate emissions from tower (tpy)	0.95
Particulate emissions from tower (g/sec)	0.027
Tower cells	<b>7</b>
Particulate emissions from each cell (g/sec)	0.004

<sup>1</sup> Technical Report EPA-600-7-79-251a, p63

Effects of Pathogenic and Toxic Materials Transported Via Cooling Device Drift - Volume 1

<b>Modeled Mercury Emission</b>	<b>CFB Boiler</b>	<b>Boiler 3</b>	<b>Boiler 4</b>	<b>Boiler 5</b>	<b>Past Potential</b>
Basis (assume: 865 mmbtu/hr)	<b>7,577,400</b>	898,593	1,579,237	2,257,818	
Basis Units	mmbtu/year	mmbtu/year	mmbtu/year	mmbtu/year	
Hg Emission Factor	<b>7.034E-07</b>	<b>1.890E-06</b>	<b>2.470E-06</b>	<b>9.860E-07</b>	
EF Units	lb/mmbtu	lb/mmbtu	lb/mmbtu	lb/mmbtu	
<b>Total Emissions (lb/year)</b>	5.330E+00	2.094E+00	5.236E+00	2.755E+00	
<b>Total Emissions (lb/hour)</b>	<b>6.084E-04</b>	<b>2.391E-04</b>	<b>5.977E-04</b>	<b>3.145E-04</b>	
<b>Partitioning (lb/hour)</b>					<b>Partition %</b>
Hg 0 (vapor)	3.042E-04	1.195E-04	2.989E-04	1.573E-04	<b>50.00%</b>
Hg 2+ (vapor)	1.825E-04	7.173E-05	1.793E-04	9.436E-05	<b>30.00%</b>
Hg p (particulate)	1.217E-04	4.782E-05	1.195E-04	6.291E-05	<b>20.00%</b>

	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>
	mmbtu/year	mmbtu/year	mmbtu/year	mmbtu/year	mmbtu/year
Unit 3	902,252.23	833,632.45	944,222.16	852,963.69	615,548.02
averages		867,942.34	888,927.30	<b>898,592.93</b>	734,255.85
		00-01	01-02	<b>02-03</b>	03-04
Unit 4	1,614,061.66	1,544,411.42	1,391,818.05	1,607,181.34	1,373,635.70
averages		<b>1,579,236.54</b>	1,468,114.74	1,499,499.69	1,490,408.52
		<b>00-01</b>	01-02	02-03	03-04
Unit 5	2,229,975.00	2,285,660.00	1,903,517.00	2,323,746.00	1,993,582.00
averages		<b>2,257,817.50</b>	2,094,588.50	2,113,631.50	2,158,664.00
		<b>00-01</b>	01-02	02-03	03-04

<b>Modeled Emission Rates (g/sec)</b>	<b>CFB Boiler</b>	<b>Boiler 3</b>	<b>Boiler 4</b>	<b>Boiler 5</b>
Hg 0 (vapor)	3.833E-05	1.506E-05	3.766E-05	1.982E-05
Hg 2+ (vapor)	2.300E-05	9.037E-06	2.259E-05	1.189E-05
Hg p (particulate)	1.533E-05	6.025E-06	1.506E-05	7.926E-06

### Dry Gas Deposition Inputs

#### Control Pathway Parameters

	<b>Hg 0 (vapor)</b>	<b>Hg 2+ (vapor)</b>
Reactivity Factor	0	1
Green Leaf LAI (autumn)	0.5	0.5
Green Leaf LAI (transition spring)	0.25	0.25

#### Source Pathway Parameters

Da (diffusivity in air; cm <sup>2</sup> /s)	7.0E-02	6.0E-02		
Dw (diffusivity in water; cm <sup>2</sup> /s)	8.0E-06	8.0E-06		
Rcl (cuticular resist - individual leaves; s/m)	1.0E+07	1.0E+07	1.0E+05	s/cm
Henry's Law (Pa m <sup>3</sup> /mol)	150	6.0E-06		

5.329584



## Fugitive Emissions

**Table B-26. Summary of Fugitive Emissions from Roads**

Emission Source	PM (lb/hr)	PM (tpy)	PM <sub>10</sub> (lb/hr)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (lb/hr)	PM <sub>2.5</sub> (tpy)
Paved Main Entrance Road	3.33E-03	1.46E-02	6.44E-04	2.82E-03	9.28E-05	4.07E-04
Paved Employee Driveway	5.98E-03	2.62E-02	1.14E-03	5.01E-03	1.55E-04	6.79E-04
Paved Limestone Delivery Road	7.31E-03	3.20E-02	1.43E-03	6.24E-03	2.13E-04	9.35E-04
Paved Alternate Fuels Delivery Road	3.66E-01	1.60E+00	7.13E-02	3.12E-01	1.07E-02	4.68E-02
<b>Total Fugitive Emissions from Roads</b>	<b>3.82E-01</b>	<b>1.67E+00</b>	<b>7.45E-02</b>	<b>3.26E-01</b>	<b>1.11E-02</b>	<b>4.88E-02</b>

### AP-42 Equations for Paved Roads

Equation 1, for short-term emissions

$$E = \left( k \left( \frac{sL}{2} \right)^{0.65} \left( \frac{W}{3} \right)^{1.5} - C \right)$$

Equation 2, for annual emissions

$$E = \left( k \left( \frac{sL}{2} \right)^{0.65} \left( \frac{W}{3} \right)^{1.5} - C \right) \left( 1 - \frac{P}{4N} \right)$$

Parameter	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>k, Particle size multiplier for PM</b>	0.082	0.016	0.0024
<b>C, Exhaust, brake wear, and tire wear for PM</b>	0.00047	0.00047	0.00036
<b>sL, silt loading</b>	7.4	7.4	7.4
<b>(sL/2)<sup>0.65</sup> =</b>	2.34	2.34	2.34
<b>W, mean vehicle weight (tons)</b>	Shown Below		
<b>P, number of days of precipitation in one year</b>	120	120	120
<b>N, number of days in the averaging period</b>	365	365	365
<b>Control Efficiency</b>	80%	80%	80%

From Table 13.2.1-1  
 From Table 13.2.1-2  
 From Table 13.2.1-4 for MSWLF  
 From HBPW  
 From Figure 13.2.1-2

#### Main Entrance Road

Vehicle Type	Length Traveled (feet)	Vehicle weight (tons)	Vehicle Miles Traveled (VMT)	Vehicles (trips) per day	Percentage of Total Vehicles	Percentage of Vehicle Weight	VMT per day
Limestone Trucks (Full)	131.2	40	0.02	1.0	1.6%	0.63	0.02
Limestone Trucks (Empty)	131.2	15	0.02	1.0	1.6%	0.23	0.02
Alternative Fuels Trucks (Full)	131.2	40	0.02	1.0	1.6%	0.63	0.02
Alternative Fuel Trucks (Empty)	131.2	15	0.02	1.0	1.6%	0.23	0.02
Visitor/Employee/Maintenance Vehicles	131.2	2	0.02	60	93.8%	1.88	1.49

Mean Vehicle Weight, W (tons) 3.6  
 Total Miles Traveled on Paved Roads 1.6

Parameter	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Short-term emission factor (lb/VMT)	5.02E-02	9.73E-03	1.40E-03
Long-term emission factor (lb/VMT)	4.61E-02	8.93E-03	1.29E-03
<b>Short-term Emissions (lb/hr)</b>	<b>3.33E-03</b>	<b>6.44E-04</b>	<b>9.28E-05</b>
<b>Long-term Emissions (tpy)</b>	<b>1.46E-02</b>	<b>2.82E-03</b>	<b>4.07E-04</b>

#### Employee Road

Vehicle Type	Length Traveled (feet)	Vehicle weight (tons)	Vehicle Miles Traveled (VMT)	Vehicles (trips) per day	Percentage of Total Vehicles	Percentage of Vehicle Weight	VMT per day
Visitor/Employee/Maintenance Vehicles	606.8	2	0.11	60.0	100.0%	2.00	6.90

Mean Vehicle Weight, W (tons) 2.0  
 Total Miles Traveled on Paved Roads 6.9

Parameter	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Short-term emission factor (lb/VMT)	2.08E-02	3.98E-03	5.40E-04
Long-term emission factor (lb/VMT)	1.91E-02	3.66E-03	4.95E-04
<b>Short-term Emissions (lb/hr)</b>	<b>5.98E-03</b>	<b>1.14E-03</b>	<b>1.55E-04</b>
<b>Long-term Emissions (tpy)</b>	<b>2.62E-02</b>	<b>5.01E-03</b>	<b>6.79E-04</b>

#### Limestone Delivery Road

Vehicle Type	Length Traveled (feet)	Vehicle weight (tons)	Vehicle Miles Traveled	Vehicles (trips) per day	Percentage of Total Vehicles	Percentage of Vehicle Weight	VMT per day
Hydrated Lime Trucks (Full)	623.2	40	0.12	1.0	50.0%	20.00	0.12
Hydrated Lime Trucks (Empty)	246	15	0.05	1.0	50.0%	7.50	0.05

Mean Vehicle Weight, W (tons) 27.5  
 Total Miles Traveled on Paved Roads 0.2

Parameter	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Short-term emission factor (lb/VMT)	1.07E+00	2.08E-01	3.11E-02
Long-term emission factor (lb/VMT)	9.78E-01	1.91E-01	2.86E-02
<b>Short-term Emissions (lb/hr)</b>	<b>7.31E-03</b>	<b>1.43E-03</b>	<b>2.13E-04</b>
<b>Long-term Emissions (tpy)</b>	<b>3.20E-02</b>	<b>6.24E-03</b>	<b>9.35E-04</b>

#### Alternative Fuels Delivery Road

Vehicle Type	Length Traveled (feet)	Vehicle weight (tons)	Vehicle Miles Traveled	Vehicles (trips) per day	Percentage of Total Vehicles	Percentage of Vehicle Weight	VMT per day
Alternative Fuels Trucks (Full)	590.4	40	0.11	52.0	50.0%	20.00	5.81
Alternative Fuel Trucks (Empty)	246	15	0.05	52.0	50.0%	7.50	2.42

Mean Vehicle Weight, W (tons) 27.5  
 Total Miles Traveled on Paved Roads 8.2

Parameter	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
Short-term emission factor (lb/VMT)	1.07E+00	2.08E-01	3.11E-02
Long-term emission factor (lb/VMT)	9.78E-01	1.91E-01	2.86E-02
<b>Short-term Emissions (lb/hr)</b>	<b>3.66E-01</b>	<b>7.13E-02</b>	<b>1.07E-02</b>
<b>Long-term Emissions (tpy)</b>	<b>1.60E+00</b>	<b>3.12E-01</b>	<b>4.68E-02</b>



BACKGROUND CONCENTRATIONS

CITY	ADDRESS	TYPE	YEAR	24-HR	ANNUAL
PM10 Grand Rapids	509 Wealthy	Urban	2005	66.0	21.0
PM10 Grand Rapids	509 Wealthy	Urban	2006	39.0	18.0
PM10 Grand Rapids	509 Wealthy	Urban	2007	59.0	20.0
				51.0	21.0
				4th High	

**Holland Board of Public Works - Application 25-07**  
**ProUCL Results of COALQUAL Bituminous Data**  
**November 10, 2008**

**COLORADO**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	290		290	290
Number of Non-Zeroes	216		143	143
Minimum	7,705	0.005	0.005	37
Maximum	14,766	0.096	0.099	1,423
Mean	11,250	0.014	0.014	155
Standard Deviation	1,355	0.015	0.015	
Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	11,403	0.019	0.020	220
99% UCL	11,466	0.026	0.027	302
99% Percentile	14,639	0.096	0.099	1,407

**ILLINOIS**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	16		16	16
Number of Non-Zeroes	16		0	0
Minimum	10,449		0	0
Maximum	12,882		0	0
Mean	11,605		0	0
Standard Deviation	639		0	0
Distribution	Normal	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	11,885		No chlorine data available	No chlorine data available
99% UCL	12,021			
99% Percentile	13,091			

**PENNSYLVANIA**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	759		759	759
Number of Non-Zeroes	701		590	590
Minimum	7,151	0.004	0.004	26
Maximum	15,043	0.188	0.194	2,828
Mean	12,760	0.072	0.074	915
Standard Deviation	985	0.038	0.039	
Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	12,821	0.078	0.081	1,005
99% UCL	12,847	0.087	0.090	1,118
99% Percentile	14,351	0.165	0.170	2,368

**UTAH**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	159		159	159
Number of Non-Zeroes	151		73	73
Minimum	3,674	0.005	0.005	20
Maximum	13,370	0.024	0.025	321
Mean	10,061	0.009	0.009	89
Standard Deviation	2,611	0.005	0.005	
Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	10,413	0.010	0.010	102
99% UCL	10,561	0.010	0.010	107
99% Percentile	13,334	0.024	0.025	320

**WYOMING**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	45		45	45
Number of Non-Zeroes	41		24	24
Minimum	9,080	0.006	0.006	52
Maximum	14,880	0.013	0.013	189
Mean	10,996	0.007	0.007	77
Standard Deviation	985	0.002	0.002	
Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	11,253	0.008	0.008	87
99% UCL	11,361	0.008	0.008	91
99% Percentile	13,408	0.013	0.013	170

**MONTANA**

	<b>Btu/lb</b>	<b>Cl (lb/MMBtu)</b>	<b>HCl (lb/MMBtu)</b>	<b>Equivalent Cl (ppm)</b>
Number of Samples	7	7	7	7
Number of Non-Zeroes	7	7	7	7
Minimum	5,075	0.007	0.008	38
Maximum	9,382	0.014	0.014	129
Mean	6,790	0.011	0.011	73
Standard Deviation	1,562	0.002	0.002	
Distribution	Normal	No Discernable Distribution	No Discernable Distribution	No Discernable Distribution
95% UCL	Not enough data available to generate reliable conclusions.			
99% UCL				
99% Percentile				



**Table 6-5. PM<sub>10</sub> Emission Rates – Net Emissions (PSD Increment Analysis)**

Point Sources		Emission Rates (lbs/hr)	Modeled Emission Rates (gram/sec)	
New CFB Boiler Unit #10 Baghouse		21.625	2.725	
Existing Unit #3 (ESP Control) – Shut down		-2.31	-0.29	
Transfer/Crusher House Baghouse		0.34	0.043	
Unit 10 Coal Storage Silos Baghouse		0.51	0.064	
Unit 10 Limestone Bin Filter		0.75	0.095	
Unit 10 Fly Ash Silo Vent		0.17	0.021	
Cooling Tower		0.22	0.027	
Fugitive Area Sources	Source Area (m <sup>2</sup> )	Maximum Net Emission Rate (lbs/day)	Maximum Net Emission Rates (lbs/hr)	Modeled Emission Rates (gram/sec/m <sup>2</sup> )
Active Coal Pile <sup>1</sup>	8,803.0	3.08	0.13	1.837E-06
Compacted Coal Pile <sup>2</sup>	13,274.0	-41.86	-1.74	-1.656E-05
Fugitive Volume Sources		Net Emission Rate (lbs/hr)	Modeled Emission Rate (gram/sec)	
Underground Loading Hopper		0.0092	1.155E-03	
Roads		0.326	0.0411	

<sup>1</sup> The fugitive emission rate for the active coal pile is the sum of the maximum daily emissions for the coal drop from ship unloading, bull dozer activities, wind erosion on the active pile (normal daily activities) and wind erosion during shipments. The net emission rate represents the increase in daily emissions resulting from the increased coal usage proposed in this modification and takes into account the control strategies that will be implemented.

<sup>2</sup> The fugitive emission rate for the compacted coal pile is the maximum daily emission rate resulting from wind erosion on the compacted area of the coal pile (normal daily activities). The net emission rate represents the decrease in daily emissions that will result from post-modification control strategies that will be implemented.