

# CCS, SO2 ROLLOUT

ATI V. EPA  
(SIERRA CLUB/ALA EMAIL)  
PRODUCTIONS AS OF  
12/23/13

Gina McCarthy Anna - Al and I spoke about this facility... 10/25/2010 07:49:33 PM

From: Gina McCarthy/DC/USEPA/US  
To: Anna Wood/DC/USEPA/US@EPA  
Cc: Janet McCabe/DC/USEPA/US@EPA  
Date: 10/25/2010 07:49 PM  
Subject: Re: Draft Permit for Summit Power

Anna - Al and I spoke about this facility last week and apparently there seems to be a great deal of interest in moving ahead with this permit since it is a large scale CCS unit (b) (5) DP

Layla Mansuri Gina, Janet: Attached is the draft permi... 10/22/2010 08:07:59 PM

CCS

From: Layla Mansuri/R6/USEPA/US  
To: Gina McCarthy/DC/USEPA/US@EPA, Janet McCabe/DC/USEPA/US@EPA  
Cc: Al Armendariz/R6/USEPA/US@EPA, Amit Srivastava/DC/USEPA/US@EPA  
Date: 10/22/2010 08:07 PM  
Subject: Draft Permit for Summit Power

Gina, Janet:

Attached is the draft permit that TCEQ prepared for the IGCC plant with CCS that Al discussed with you today.

The document below includes

- notice information, pdf pages 1-4,
- the draft permit, pdf pp. 5-36
- summary of the TCEQ's technical review called a "preliminary determination summary" is at the back, pp.37-50.



Summit Public Notice and Draft Permit.pdf

Thanks,  
Layla

Layla Mansuri  
Associate Regional Administrator  
US EPA Region 6  
214-665-3100 (direct)

Help eliminate environmental violations - report tips and complaints at:

Principal Deputy Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5426K, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
202-564-3206  
mccabe.janet@epa.gov

Anna Wood      We will look into this first thing tomorrow...      10/25/2010 07:58:08 PM

From: Anna Wood/DC/USEPA/US  
To: Gina McCarthy/DC/USEPA/US@EPA  
Cc: Janet McCabe/DC/USEPA/US@EPA  
Date: 10/25/2010 07:58 PM  
Subject: Re: Draft Permit for Summit Power

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We will look into this first thing tomorrow and see what we can find out.

Gina McCarthy

----- Original Message -----

**From:** Gina McCarthy  
**Sent:** 10/25/2010 07:49 PM EDT  
**To:** Anna Wood  
**Cc:** Janet McCabe  
**Subject:** Re: Draft Permit for Summit Power

Anna - (b) (5) DP



Layla Mansuri      Gina, Janet: Attached is the draft permi...      10/22/2010 08:07:59 PM

From: Layla Mansuri/R6/USEPA/US  
To: Gina McCarthy/DC/USEPA/US@EPA, Janet McCabe/DC/USEPA/US@EPA  
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[attachment "Summit Public Notice and Draft Permit.pdf" deleted by Anna Wood/DC/USEPA/US]

Thanks,  
Layla

Rob Brenner/DC/USEPA/US

10/27/2010 09:25 PM

To: Gina McCarthy

cc

bcc

Subject: Re: Fw: Draft Permit for Summit Power

I'll find out--I'm assuming you want someone from their national office. If you want someone from Texas, just send me back a note.

Gina McCarthy

Rob - Who is the Sierra Club person th...

10/27/2010 09:07:29 PM

From: Gina McCarthy/DC/USEPA/US  
To: Brenner.Rob@EPA.GOV  
Date: 10/27/2010 09:07 PM  
Subject: Fw: Draft Permit for Summit Power

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Rob - Who is the Sierra Club person that I need to speak with to get a sense of what they think of the Summit proposal?

----- Forwarded by Gina McCarthy/DC/USEPA/US on 10/27/2010 09:05 PM -----

From: Anna Wood/DC/USEPA/US  
To: Gina McCarthy/DC/USEPA/US@EPA  
Cc: Janet McCabe/DC/USEPA/US@EPA, Steve Page/RTP/USEPA/US@EPA  
Date: 10/27/2010 06:48 PM  
Subject: Re: Draft Permit for Summit Power

Hi Gina, to follow-up on your earlier request below, we checked in with Region 6 on the referenced permit. Please note the following:

The initial PSD permit application was submitted to Texas in April 2010. In talking with Region 6, the Region expects the draft PSD permit package from Texas within 30 days, which starts the PSD public comment period. A public hearing and permit appeal to the TCEQ is uncertain, but possible. Once the permit has gone through TCEQ's contested case hearing process (which would include any contested case hearing proceedings that goes to their administrative law judges) the permit would be final upon approval by the a majority of the commissioners. The permit is then subject to appeal in the state court and could be overturned by the State court system. With the upcoming required public notice and participation process required under Texas law, R 6 does not expect the Texas PSD permit to be issued and in effect before Jan. 2.

The Region also intends to carefully review the modeling when submitted. The proposed source is close to I-20. A potential issue is NO2 one- hour standard modeling , we will not know until we get the modeling.

Texas is a SIP approved program. As a result and as noted above, permit appeals go through the Texas administrative/court process for contested PSD permits instead of the EAB. We talked with Kristi Smith of OGC and she said the effective date of the Texas permit is a matter of state law.

(b) (5) DP

The Region has heard very little on the environmental group front with respect to opposition to this facility.

(b) (5) DP

We researched the permit on the Sierra Club's web site and it does not express outright opposition to the project and seems to suggest that unlike other projects underway in Texas (e.g. Tenaska) the Summit project is notable for including IGCC and CCS. We've cut and pasted the information on the Sierra Club web site for your convenience. Based upon where we understand Clean Air Task Force and Environmental Defense to be on these types of projects, we would not expect them to oppose the Summit Project.

Please let me know if you need anything else on this, thanks. Anna

- **Summit Power Seeks Approval for IGCC Coal Plant with 90% Carbon Capture**

Pushing the envelope further on coal plants, Summit Texas Clean Energy, LLC, a unit of Summit Power based in Washington State, has submitted its application for an air quality and Prevention of Significant Deterioration (PSD) permit to the Texas Commission on Environmental Quality (TCEQ). According to its application, the proposed 400 MW coal plant would be located at the former Penwell FutureGEN site in Ector County, and would utilize both Integrated Gasification Combined Cycle (IGCC) technology as well as a carbon dioxide capture and sequestration system to capture at least 90 percent of its carbon dioxide emissions. The resulting captured carbon dioxide would be sold under contract and injected underground for Enhanced Oil Recovery (EOR). In addition to electricity and carbon dioxide, the proposed facility would also produce urea to be sold for fertilizer production.

**While another company, Tenaska, has also submitted an application to TCEQ that includes a promise to capture the majority of its carbon dioxide emissions, the Summit application is notable for including both IGCC technology and carbon capture.** IGCC technology is a process whereby the coal – in this case Powder River Basin sub-bituminous coal – is first turned into a gas before being combusted to produce steam for electricity. As such, emissions are generally closer to those associated with a natural gas combined cycle plant than a traditional coal plant. More recently, NRG announced that it had received money through the ARRA – federal stimulus – to also design an “advanced” coal demonstration plant with carbon capture technology in Texas.

**The Lone Star Chapter of the Sierra Club is currently seeking a contested case hearing on the Tenaska plant due to a variety of concerns about its emissions, water use and lack of enforceability on its CO2 capture numbers, and is currently reviewing the Summit application. Generally, Sierra Club has opposed all new applications for coal or petroleum coke plants in Texas due to concerns over criteria air pollutant emissions, global warming gases, water use, and the impacts of extraction and transportation of coal.**

#### **Proposed Emission Limits**

The majority of the proposed emissions associated with the plant involve the coal mill drying process, the gasifier flares associated with start-up and the actual combustion turbine and duct burner once the synthetic gas produced is burned. In addition, a significant amount of emissions – about 200 tons per year of particulate matter – is associated with the urea granulation stack. Thus, while much cleaner than a traditional coal plant,

Jan Cortelyou-Lee Emily has blocked 1:30 - 3:30 on yo...

02/06/2013 12:55:49 PM

From: Jan Cortelyou-Lee/RTP/USEPA/US  
To: Janet McCabe/DC/USEPA/US@EPA  
Cc: John Millett/DC/USEPA/US@EPA, Anna Wood/RTP/USEPA/US@EPA, Emily Atkinson/DC/USEPA/US@EPA, Michael Ling/RTP/USEPA/US@EPA, Nate McMichael/DC/USEPA/US@EPA, Peter South/RTP/USEPA/US@EPA, Richard Wayland/RTP/USEPA/US@EPA, Scott Mathias/RTP/USEPA/US@EPA, Steve Page/RTP/USEPA/US@EPA  
Date: 02/06/2013 12:55 PM  
Subject: Re: SO2 rollout and other SO2 stuff

Emily has blocked 1:30 - 3:30 on your calendar. Chet Wayland, Rich Damberg, and Rhonda Wright will be on from here.

(b) (5) DP

Jan Cortelyou-Lee  
United States Environmental Protection Agency  
Office of Air Quality Planning and Standards  
MD-C404-03  
109 TW Alexander Drive  
Research Triangle Park, NC 27709  
phone: 919-541-5393  
FAX: 919-541-2464

SO2  
rollout

Janet McCabe Gina just said multiple times and very e...

02/06/2013 12:49:19 PM

From: Janet McCabe/DC/USEPA/US  
To: John Millett/DC/USEPA/US  
Cc: Anna Wood/RTP/USEPA/US@EPA, Emily Atkinson/DC/USEPA/US@EPA, Jan Cortelyou-Lee/RTP/USEPA/US@EPA, Michael Ling/RTP/USEPA/US@EPA, Nate McMichael/DC/USEPA/US@EPA, Peter South/RTP/USEPA/US@EPA, Richard Wayland/RTP/USEPA/US@EPA, Scott Mathias/RTP/USEPA/US@EPA, Steve Page/RTP/USEPA/US@EPA  
Date: 02/06/2013 12:49 PM  
Subject: Re: SO2 rollout and other SO2 stuff

Gina just said multiple times and very emphatically to Sierra Club that the letters are going out tomorrow.

(b) (5) DP

Janet McCabe  
Principal Deputy Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5426K, 1200 Pennsylvania Avenue NW  
Washington, DC 20460

Anna Marie Wood  
Director, Air Quality Policy Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
AQPD (C504-01)  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
Phone: (919) 541- 3604  
Fax: (919) 541- 4028

Janet McCabe      John, Nate--I wanted to bring you up to...      02/06/2013 09:37:10 AM

From: Janet McCabe/DC/USEPA/US  
To: John Millett/DC/USEPA/US, Michael Ling/RTP/USEPA/US@EPA, Richard Wayland/RTP/USEPA/US@EPA, Anna Wood/RTP/USEPA/US, Scott Mathias/RTP/USEPA/US@EPA, Nate McMichael/DC/USEPA/US  
Cc: Emily Atkinson/DC/USEPA/US  
Date: 02/06/2013 09:37 AM  
Subject: SO2 rollout and other SO2 stuff

John, Nate--I wanted to bring you up to date on the latest with the SO2 120 day letters, if OAQPS hasn't already, and add a few tidbits that came up in the morning meeting with Gina today.

We are having a call with Sierra Club, at their request, today at noon. [REDACTED]

The revised talking points are good--thanks you guys. We talked yesterday about the letters going out thursday with an environmentalists call mid-day to walk them through it. (b) (5) DP [REDACTED]

Is the webinar already scheduled? I'd like to have that on my calendar too, so I can at least go to the beginning of it.

Janet McCabe  
Principal Deputy Assistant Administrator  
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[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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