

**Given/Assume**

**Combustion**

	Enter Value	
C1 =	167	Coal burn, tons/hr
HV =	11,313	Btu/lb
S1 =	0.63	Coal sulfur weighted average, %

K2 =	0.875	0.95	for bituminous coals
		0.875	for subbituminous coals
			= 0.55 to 0.85 for lignite, based on the Na content
		1.0	for oil

F1 = 0.0019 Fuel Impact Factor from F1 table

F2 (AH) =	1.00	Technology Impact Factor from F2 tables	If not applicable, enter "1".
F2 (PM) =	1	Technology Impact Factor from F2 tables	If not applicable, enter "1".
F2 (FGD) =	0.01	Technology Impact Factor from F2 tables	If not applicable, enter "1".

**For SCR**

S2 = 0.03 SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 fsops = 0.9647 portion of time that SCR is in use

F2 (AH) =	1.00	Technology Impact Factor from F2 tables	If not applicable, enter "1".
F2 (PM) =	1	Technology Impact Factor from F2 tables	If not applicable, enter "1".
F2 (FGD) =	0.01	Technology Impact Factor from F2 tables	If not applicable, enter "1".

F3SCR =	1	Technology Impact Factors for SCR	
		Coal Type	F3SCR
		PRB	0.17
		Other Coals	1 (no data available)

fsreagent = 0.95 fraction of operation with reagent injection  
 SNH3 = 0.75 NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet

**Equation 4-1  $EM_{Comb} = K \cdot F1 \cdot E2$**

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 F1 = 0.0019 Fuel Impact Factor from F1 table

**Equation 4-3  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$**

C1 = 167 Coal burn, tons/hr  
 S1 = 0.63 Coal sulfur weighted average, %  
 K1 = Molecular weight and units conversion constant  
 0.02 SO<sub>2</sub>/%S  
 K2 = Sulfur conversion to SO<sub>2</sub>  
 0.875 0.95 for bituminous coals  
 0.875 for subbituminous coals  
 = 0.55 to 0.85 for lignite, based on the Na content  
 1.0 for oil

E2 = K1 • K2 • C1 • S1  
 E2 = 0.02 \* 0.875 \* 167 \* 0.63  
 E2 = 2 SO<sub>2</sub> mass rate, tons/hr

EMComb = K \* F1 \* E2  
 EMComb = 3063 \* 0.0019 \* 2  
 EMComb = 10.74 total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

**Sulfuric Acid Released from Combustion (ERComb)**

**Equation 4-3  $ER_{Comb} = EM_{Comb} \cdot F2$  (all that apply)**

ERComb = EMComb • F2 (AH) • F2 (PM) • F2 (FGD)  
 ERComb = 11 \* 1 \* 1 \* 0.01  
 ERComb = 0.11 total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

**Sulfuric Acid Manufacture by SCR (EMSCR)**

**EMSCR = K • S2 • fsops • E2 • F3SCR** = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 S2 = 0.03 SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 fsops = 0.9647 for continuous operation  
 E2 = 2 SO<sub>2</sub> produced, tons per hour  
 F3SCR = 1 Technology Impact Factor, for SCR Table 4-2  
 EMSCR = K • S2 • fsops • E2 • F3SCR  
 EMSCR = 3063 \* 0.03 \* 0.9647 \* 2 \* 1  
 EMSCR = 163.66 = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

**Equation 4-11a: Manufacture**

$$\text{TSAM} = \text{EMComb} + \text{EMSCR/SNCR} +$$

$$\text{TSAM} = \text{EMComb} + \text{EMSCR/SNCR} + \text{EMFGC}$$

$$\text{TSAM} = 11 + 164$$

$$\text{TSAM} = 174.40 = \text{Total H}_2\text{SO}_4 \text{ manufactured, lbs per hour}$$

**Sulfuric Acid Released from SCR and SNCR**

$$\text{Equation 4-5 } \text{ERSCR} = [\text{EMSCR} - (\text{Ks} \cdot \text{B} \cdot \text{fsreagent} \cdot \text{SNH}_3)] \cdot \text{F2x}$$

ERSCR = Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

EMSCR = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Ks = 3799 Conversion factor

HV = 11,313 Btu/lb

B = 3.79E-03 Coal burn in TBtu/hr

fsreagent = 0.95 fraction of SCR operation with reagent injection

SNH<sub>3</sub> = 0.75 NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet

• SCR averages 0.75 ppmv over catalyst guarantee period

• SNCR averages 5 ppmv

• Note: actual NH<sub>3</sub> slip data should be used if available

F2x = Technology Impact Factors, all that apply

$$\text{ERSCR} = [\text{EMSCR} - (\text{Ks} \cdot \text{B} \cdot \text{fsreagent} \cdot \text{SNH}_3)] \cdot \text{F2 (AH)} \cdot \text{F2 (PM)} \cdot \text{F2 (FGD)}$$

$$\text{ERSCR} = (164 - (3799 \cdot 3.79\text{E-}03 \cdot 0.95 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 0.01$$

$$\text{ERSCR} = (164 - (1.03\text{E+}01)) \cdot 0.01$$

$$\text{ERSCR} = 153 \cdot 0.01$$

$$\text{ERSCR} = 1.53 \text{ Total H}_2\text{SO}_4 \text{ released from SCR, lbs per hour}$$

**Equation 4-11b: Release**

$$\text{TSAR} = \text{ERComb} + \text{ERSCR/SNCR} + \text{ERFGC}$$

$$\text{TSAR} = \text{ERComb} + \text{ERSCR/SNCR} + \text{ERFGC}$$

$$\text{TSAR} = 0.11 + 1.53 +$$

$$\text{TSAR} = 1.64 \text{ Total H}_2\text{SO}_4 \text{ released, lbs per hour}$$

**Table 4-1**

**Summary of Fuel Impact Factors (F1) for Steam Generating Units**

Fuel	Equipment	F1	Comment
Eastern Bituminous (all)	Dry Bottom Boiler	0.0000011163*SO2+0.0064877	32 data points; SO2 = S1*KF1/HV SO2 = Boiler SO2 concentration (ppmvd, 3% O2, dry) derived from fuel sulfur content (%) S1 = Coal sulfur weighted average, % dry = 0.63 KF1 = 10,003,602 HV = Coal heating value, Btu/lb, dry = 11,313 SO2 = 0.63 * 10,003,602 / 11313 = 557 ppmvd
		0.007109571	
Med-High S Eastern Bituminous (>2.5%)	Cyclone	0.016	One data point.
W. Bituminous	Dry Bottom Boiler	0.00111	One data point.
W. Bituminous	Cyclone	0.0022	One data point.
Subbituminous/PRB	All Boilers	0.0019	Average of 8 units
Lignite	Dry Bottom Boiler	0.0044	Two data points.
Lignite	Cyclone	0.00112	One data point.
Petroleum coke	Boiler	0.04	One data point.
Natural gas	Boiler	0.01	
#2 Fuel oil	Boiler	0.01	
#6 Fuel oil	Boiler	0.025	
Used oil	Boiler	0.0175	
Natural gas	CT	See Table 6-1	
#2 Fuel oil	CT	See Table 6-1	
Natural gas	CC	0.0555	
#2 Fuel oil	CC	0.0555	New category in 2007.
Other Alternative Fuels	Any	0.04	
Other Alternative Fuels, co-fired w/coal, >75% heat throughput	NA		Use Coal F1, in absence of any applicable data.

**Table 4-3****Summary of F2 Factors for Air Heater Removal of Sulfuric Acid**

<b>Boiler Type</b>	<b>Fuel</b>	<b>F2</b>	<b>Comment</b>
All Boilers	Low S Eastern Bit	0.50	Average of measurements at 7 units.
All Boilers	Med-High S Eastern Bit (S >2.5%)	0.85	Based on two data points.
All Boilers	PRB	0.36	Based on two data points.

**Table 3-2****Summary of F2 Factors for Particulate Control Devices (ESP, Baghouse)**

<b>Equipment Type</b>	<b>Coal Type</b>	<b>F2 Factor</b>	<b>Comment or Observation</b>
Cold-side ESP	Low S Eastern Bit	0.63	Average of measurements at 4 units.
Cold-side ESP	High S Eastern Bit (>2.5%)	0.77	Average of measurements at 3 units.
Cold-side ESP	Subbituminous (PRB)	0.72	Based on one measurement at one unit.
Hot-side ESP	All	0.63	Based on one measurement at one unit.
Wet ESP	All	0.12	Average of measurements at 2 units.
Baghouse	Subbituminous coal	0.10	Two data points.

**Table 3-3****Summary of F2 Factors for Wet, Dry FGD Equipment and Additives**

<b>FGD Type</b>	<b>Coal Type</b>	<b>F2 Factor</b>	<b>Comment or Observation</b>
Wet: Spray Tower	E. Bituminous	0.47	Seven data points.
Wet: Spray Tower	PRB or Lignite	0.40	Two data points.
Wet: Venturi Tower	All coals	0.73	Four data points.
Dry FGD and baghouse	All coals	0.01	Two data points.
Mg-Ox mixed w/fuel oil	All fuel	0.50	One data point.
Mg-Ox into furnace	All fuel	0.25	One data point.

**Table 4-2**

**F<sub>3SCR</sub> Technology Impact Factors for SCR**

<b>Coal Type</b>	<b>F<sub>3SCR</sub></b>
PRB	0.17
Other Coals	1 (no data available)

**Equation 4-1 EMComb = K • F1 • E2**

where,

EMComb= total H<sub>2</sub>SO<sub>4</sub> *manufactured* from combustion, lbs/yr

K = Molecular weight and units conversion constant, equal to 3,063.

This value is derived as follows: 98.07/64.04 • 2000 = 3,063.

Here, 98.07 is the molecular weight of H<sub>2</sub>SO<sub>4</sub>; 64.04 is the molecular weight of SO<sub>2</sub>; conversion from tons per year to pounds per year requires multiplying by 2000.

F1 = Fuel Impact Factor

E2 = Sulfur dioxide (SO<sub>2</sub>) emissions, either: (1) recorded by a continuous emissions monitor, tons/yr, or (2) calculated from coal burn data, tons/yr.

When any source uses FGD equipment or another technology to control SO<sub>2</sub> emissions, either the fuel basis **must** be used for the manufacturing and release calculations, or CEMS data can be used but only when the CEMS precedes the FGD or SO<sub>2</sub> control equipment

As an alternative to using CEMS data, the following relationship based on coal burn data can be used to estimate the rate of SO<sub>2</sub> emissions:

**Equation 4-2b E2 = K1 • K2 • C1 • S1**

where,

E2 = SO<sub>2</sub> mass rate, tons/yr

C1 = Coal burn, tons/yr

S1 = Coal sulfur weighted average, %

K1 = Molecular weight and units conversion constant, equal to 0.02. This value is derived from (64.04)/(100 • 32.06) = 0.02. Here, 64.04 is the molecular weight of SO<sub>2</sub>; 32.06 is the molecular weight of S; and conversion of % S to a fraction requires multi

K2 = Sulfur conversion to SO<sub>2</sub>, implicit from EPA AP-42 (EPA, 1995b)

= 0.95 for bituminous coals

= 0.875 for subbituminous coals

= 0.55 to 0.85 for lignite, based on the Na content

= 1.0 for oil

***Sulfuric Acid Released from Combustion (ERComb)***

For units that do not employ SCR or SNCR NO<sub>x</sub> control or FGC, the sulfuric acid released is the product of the amount manufactured and the Technology Impact Factors (F2) for all downstream equipment (the air heater, the particulate control device, the FGD,

**Equation 4-3 ERComb = EMComb • F2 (all that apply)**

**Sulfuric Acid Manufacture by SCR (EMSCR)**

The following relationship estimates the total H2SO4 manufactured from an SCR equipped utility boiler or steam generator:

**Equation 4-4  $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$**

where,

EMSCR = Total H2SO4 manufactured from SCR, lbs per year

K = Conversion factor = 3063

S2 = SCR catalyst SO2 oxidation rate (specified as a decimal, typically from 0.001-0.03)

fsops = Operating factor of SCR system, or the fraction of coal burn when the flue gas is directed through the SCR, whether NH3 reagent is injected to derive NOx reduction or not. This value should reflect the hours the SCR reactor processed flue gas, whi

E2 = SO2 produced, tons per year

F3SCR = Technology Impact Factor, for SCR

An F3SCR factor for PRB coals is shown in Table 4-2. This factor is derived from measurements at two PRB-fired units. SO3 emitted from these units was lower than specified in the catalyst guarantee, which was based on laboratory test data. At present, the

**Table 4-2**

**F3SCR Technology Impact Factors for SCR**

**Coal Type**

PRB

Other Coals

**F3SCR**

0.17

1 (no data available)

### ***Sulfuric Acid Released from SCR and SNCR***

The sulfuric acid released from SCR or SNCR is determined by subtracting from the sulfuric acid manufactured the amount removed by the residual ammonia, or ammonia slip. For SCR, the sulfuric acid released (ERSCR) is estimated with the following relations

$$\text{Equation 4-5 } \text{ERSCR} = [\text{EMSCR} - (\text{Ks} \cdot \text{B} \cdot \text{fsreagent} \cdot \text{SNH3})] \cdot \text{F2x}$$

where,

ERSCR = Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per year

EMSCR = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per year

Ks = Conversion factor = 3799

B = Coal burn in TBtu/yr

fsreagent = fraction of SCR operation with reagent injection, when residual NH<sub>3</sub> is produced that will remove SO<sub>3</sub>. The value of fsreagent will be similar to, but slightly less than, the value of fsops, defined for Equation 4-4.

SNH<sub>3</sub> = NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet:

- SCR averages 0.75 ppmv over catalyst guarantee period
- SNCR averages 5 ppmv
- Note: actual NH<sub>3</sub> slip data should be used if available

F2x = Technology Impact Factors, all that apply

The conversion factor Ks, equal to 3799, considers all relevant constants to yield the result in pounds per year of sulfuric acid. The derivation of this constant, for the case where residual NH<sub>3</sub> is reported in terms of 6% oxygen and "wet" flue gas at 8.1

The coal burn rate in TBtu/yr is obtained from coal use records, such as those reported to EIA in Form 767. The operating factor of the SCR describes the portion of the coal burn that reflects the period of SCR operation, based on whether the unit operate

Accordingly, total sulfuric acid manufacture (TSAM) and release (TSAR) is estimated for a generating unit equipped with SCR and flue gas conditioning by the following equations:

#### **Equation 4-11a: Manufacture**

$$\text{TSAM} = \text{EMComb} + \text{EMSCR/SNCR} + \text{EMFGC}$$

#### **Equation 4-11b: Release**

$$\text{TSAR} = \text{ERComb} + \text{ERSCR/SNCR} + \text{ERFGC}$$

Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 186.853$  Coal burn, tons/hr  
 $S1 = 0.45$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$  0.95 for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 186.853 \cdot 0.45$   
 $E2 = 1.471467$  SO<sub>2</sub> mass rate, tons/hr

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.471467$   
 $EMComb = 8.563499$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 8.563499 \cdot 1 \cdot 0.72 \cdot 0.73$   
 $ERComb = 4.500975$  total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0$  no SCR in baseline case  
 $E2 = 1.47$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0 \cdot 1.47 \cdot 1$   
 $EMSCR = 0$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 8.563499 + 0 + 0$   
 $TSAM = 8.563499$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour



Equation 4  $EM_{Comb} = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 167.456$  Coal burn, tons/hr  
 $S1 = 0.63$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$  0.95 for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 167.456 \cdot 0.63$   
 $E2 = 1.846202$  SO<sub>2</sub> mass rate, tons/hr

$EM_{Comb} = K \cdot F1 \cdot E2$   
 $EM_{Comb} = 3063 \cdot 0.0019 \cdot 1.846202$   
 $EM_{Comb} = 10.74434$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
 Equation 4-3  $ER_{Comb} = EM_{Comb} \cdot F2$  (all that apply)  
 $ER_{Comb} = EM_{Comb} \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ER_{Comb} = 10.74434 \cdot 1 \cdot 1 \cdot 0.01$   
 **$ER_{Comb} = 0.107443$  total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr**

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0.9647$  for continuous operation  
 $E2 = 1.846202$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EM_{SCR} = 3063 \cdot 0.03 \cdot 0.9647 \cdot 1.846202 \cdot 1$   
 $EM_{SCR} = 163.659$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EM_{Comb} + EM_{SCR}/SNCR + EM_{FGC}$   
 $TSAM = 10.74434 + 163.659$   
 $TSAM = 174.4033$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5 ERSCR = [EMSCR - (Ks • B • fsreagent • SNH3)] • F2x

ERSCR = Total H2SO4 released from SCR, lbs per hour

EMSCR = Total H2SO4 manufactured from SCR, lbs per hour

Ks = 3799 Conversion factor

HV = 11313 Btu/lb

B = 0.003789 Coal burn in TBtu/hr

fsreagent = 0.95 fraction of SCR operation with reagent injection

SNH3 = 0.75 NH3 slip from SCR/SNCR, ppmv at 6% O2, wet  
 • SCR averages 0.75 ppmv over catalyst guarantee period  
 • SNCR averages 5 ppmv  
 • Note: actual NH3 slip data should be used if available

F2x = Technology Impact Factors, all that apply

$$ERSCR = [EMSCR - (Ks \cdot B \cdot fsreagent \cdot SNH3)] \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ERSCR = (163.659 - (3799 \cdot 0.003789 \cdot 0.95 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 0.01$$

$$ERSCR = (163.659 - 10.25564) \cdot 0.01$$

$$ERSCR = 153.4033 \cdot 0.01$$

ERSCR = 1.534033 Total H2SO4 released from SCR, lbs per hour

Equation 4-11b: Release

TSAR = ERComb + ERSCR/SNCR + ERFGC

TSAR = ERComb + ERSCR/SNCR + ERFGC

TSAR = 0.107443 + 1.534033 +

**TSAR = 1.641477 Total H2SO4 released, lbs per hour**

Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063 \text{ lb H}_2\text{SO}_4/\text{ton SO}_2$   
 $F1 = 0.0019 \text{ Fuel Impact Factor from F1 table}$

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 186.747 \text{ Coal burn, tons/hr}$   
 $S1 = 0.45 \text{ Coal sulfur weighted average, \%}$   
 $K1 = \text{Molecular weight and units conversion constant}$   
 $\quad 0.02 \text{ SO}_2/\%S$   
 $K2 = \text{Sulfur conversion to SO}_2$   
 $\quad 0.875$   
 $\quad 0.95 \text{ for bituminous coals}$   
 $\quad 0.875 \text{ for subbituminous coals}$   
 $\quad = 0.55 \text{ to } 0.85 \text{ for lignite, based on the Na content}$   
 $\quad 1 \text{ for oil}$   
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 186.747 \cdot 0.45$   
 $E2 = 1.470633 \text{ SO}_2 \text{ mass rate, tons/hr}$

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.470633$   
 $EMComb = 8.558641 \text{ total H}_2\text{SO}_4 \text{ manufactured from combustion, lbs/hr}$

Sulfuric Acid Released from Combustion (ERComb)  
Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 8.558641 \cdot 1 \cdot 0.72 \cdot 0.73$   
 $ERComb = 4.498422 \text{ total H}_2\text{SO}_4 \text{ released from combustion, lbs/hr}$

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR = \text{Total H}_2\text{SO}_4 \text{ manufactured from SCR, lbs per hour}$   
 $K = 3063 \text{ lb H}_2\text{SO}_4/\text{ton SO}_2$   
 $S2 = 0.03 \text{ SCR catalyst SO}_2 \text{ oxidation rate (specified as a decimal, typically from } 0.001 - 0.03)$   
 $fsops = 0 \text{ no SCR in baseline case}$   
 $E2 = 1.470633 \text{ SO}_2 \text{ produced, tons per hour}$   
 $F3SCR = 1 \text{ Technology Impact Factor, for SCR}$  Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0 \cdot 1.470633 \cdot 1$   
 $EMSCR = 0 = \text{Total H}_2\text{SO}_4 \text{ manufactured from SCR, lbs per hour}$

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 8.558641 + 0 + 0$   
 $TSAM = 8.558641 = \text{Total H}_2\text{SO}_4 \text{ manufactured, lbs per hour}$



Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 163.736$  Coal burn, tons/hr  
 $S1 = 0.59$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$  0.95 for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 163.736 \cdot 0.59$   
 $E2 = 1.690574$  SO<sub>2</sub> mass rate, tons/hr

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.690574$   
 $EMComb = 9.838635$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
 Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 9.838635 \cdot 1 \cdot 1 \cdot 0.01$   
**ERComb = 0.098386** total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0.988$  for continuous operation  
 $E2 = 1.690574$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0.988 \cdot 1.690574 \cdot 1$   
 $EMSCR = 153.4827$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 9.838635 + 153.4827$   
 $TSAM = 163.3213$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5  $ER_{SCR} = [EM_{SCR} - (K_s \cdot B \cdot fs_{reagent} \cdot SNH_3)] \cdot F_2x$

$ER_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

$EM_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

$K_s$  = 3799 Conversion factor

$HV$  = 11523 Btu/lb

$B$  = 0.003773 Coal burn in TBtu/hr

$fs_{reagent}$  = 0.97 fraction of SCR operation with reagent injection

$SNH_3$  = 0.75 NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet

- SCR averages 0.75 ppmv over catalyst guarantee period

- SNCR averages 5 ppmv

- Note: actual NH<sub>3</sub> slip data should be used if available

$F_2x$  = Technology Impact Factors, all that apply

$ER_{SCR} =$	[	$EM_{SCR}$	-	(	$K_s$	•	$B$	•	$fs_{reagent}$	•	$SNH_3$	)]	•	$F_2(AH)$	•	$F_2(PM)$	•	$F_2(FGD)$
$ER_{SCR} =$	(	153.4827	-	(	3799	*	0.003773	*	0.97	*	0.75	)]	*	1	*	1	*	0.01
$ER_{SCR} =$	(	153.4827	-	(	10.42898							)]	*	0.01				
$ER_{SCR} =$		143.0537										*	0.01					
$ER_{SCR} =$	1.430537	Total H <sub>2</sub> SO <sub>4</sub> released from SCR, lbs per hour																

Equation 4-11b: Release

$TSAR = ER_{Comb} + ER_{SCR/SNCR} + ER_{FGC}$

$TSAR = ER_{Comb} + ER_{SCR/SNCR} + ER_{FGC}$

$TSAR = 0.098386 + 1.430537 +$

**$TSAR = 1.528924$  Total H<sub>2</sub>SO<sub>4</sub> released, lbs per hour**

Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 199.105$  Coal burn, tons/hr  
 $S1 = 0.45$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$  0.95 for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 199.105 \cdot 0.45$   
 $E2 = 1.567952$  SO<sub>2</sub> mass rate, tons/hr

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.567952$   
 $EMComb = 9.12501$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
 Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 9.12501 \cdot 1 \cdot 0.1 \cdot 0.4$   
 $ERComb = 0.365$  total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0$  no SCR installed at Hunter 3  
 $E2 = 1.567952$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0 \cdot 1.567952 \cdot 1$   
 $EMSCR = 0$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 9.12501 + 0 + 0$   
 $TSAM = 9.12501$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour



Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 199$  Coal burn, tons/hr  
 $S1 = 0.56$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$   
 $0.95$  for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 199 \cdot 0.56$   
 $E2 = 1.9502$  SO<sub>2</sub> mass rate, tons/hr

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.9502$   
 $EMComb = 11.34958$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 11.34958 \cdot 1 \cdot 0.72 \cdot 0.73$   
 $ERComb = 5.965339$  total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0$  no SCR in baseline case  
 $E2 = 1.9502$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0 \cdot 1.9502 \cdot 1$   
 $EMSCR = 0$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 11.34958 + 0 + 0$   
 $TSAM = 11.34958$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour



Equation 4  $EMComb = K \cdot F1 \cdot E2$   
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $F1 = 0.0019$  Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $C1 = 164.883$  Coal burn, tons/hr  
 $S1 = 0.6$  Coal sulfur weighted average, %  
 $K1 =$  Molecular weight and units conversion constant  
 $0.02$  SO<sub>2</sub>/%S  
 $K2 =$  Sulfur conversion to SO<sub>2</sub>  
 $0.875$  0.95 for bituminous coals  
 $0.875$  for subbituminous coals  
 $= 0.55$  to  $0.85$  for lignite, based on the Na content  
 $1$  for oil  
 $E2 = K1 \cdot K2 \cdot C1 \cdot S1$   
 $E2 = 0.02 \cdot 0.875 \cdot 164.883 \cdot 0.6$   
 $E2 = 1.731272$  SO<sub>2</sub> mass rate, tons/hr

$EMComb = K \cdot F1 \cdot E2$   
 $EMComb = 3063 \cdot 0.0019 \cdot 1.731272$   
 $EMComb = 10.07548$  total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)  
 Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)  
 $ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$   
 $ERComb = 10.07548 \cdot 1 \cdot 1 \cdot 0.01$   
**ERComb = 0.100755 total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr**

Sulfuric Acid Manufacture by SCR (EMSCR)  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour  
 $K = 3063$  lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>  
 $S2 = 0.03$  SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)  
 $fsops = 0.977$  for continuous operation  
 $E2 = 1.731272$  SO<sub>2</sub> produced, tons per hour  
 $F3SCR = 1$  Technology Impact Factor, for SCR Table 4-2  
 $EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$   
 $EMSCR = 3063 \cdot 0.03 \cdot 0.977 \cdot 1.731272 \cdot 1$   
 $EMSCR = 155.4275$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture  
 $TSAM = EMComb + EMSCR/SNCR + EMFGC$   
 $TSAM = 10.07548 + 155.4275$   
 $TSAM = 165.503$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5  $ER_{SCR} = [EM_{SCR} - (K_s \cdot B \cdot fs_{reagent} \cdot SNH_3)] \cdot F_2x$

$ER_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

$EM_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

$K_s$  = 3799 Conversion factor

$HV$  = 12011 Btu/lb

$B$  = 0.003961 Coal burn in TBtu/hr

$fs_{reagent}$  = 0.96 fraction of SCR operation with reagent injection

$SNH_3$  = 0.75 NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet

• SCR averages 0.75 ppmv over catalyst guarantee period

• SNCR averages 5 ppmv

• Note: actual NH<sub>3</sub> slip data should be used if available

$F_2x$  = Technology Impact Factors, all that apply

$ER_{SCR} =$	[	$EM_{SCR}$	-	(	$K_s$	•	$B$	•	$fs_{reagent}$	•	$SNH_3$	)]	•	$F_2$ (AH)	•	$F_2$ (PM)	•	$F_2$ (FGD)
$ER_{SCR} =$	(	155.4275	-	(	3799	*	0.003961	*	0.96	*	0.75	)]	*	1	*	1	*	0.01
$ER_{SCR} =$	(	155.4275	-	(	10.83395	)]	*					*	0.01					
$ER_{SCR} =$		144.5936										*	0.01					
$ER_{SCR} =$		1.445936																

Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

Equation 4-11b: Release

$TSAR = ER_{Comb} + ER_{SCR/SNCR} + ER_{FGC}$

$TSAR = ER_{Comb} + ER_{SCR/SNCR} + ER_{FGC}$

$TSAR = 0.100755 + 1.445936 +$

**$TSAR = 1.546691$  Total H<sub>2</sub>SO<sub>4</sub> released, lbs per hour**

Equation 4  $EMComb = K \cdot F1 \cdot E2$

K = 3063 lb H2SO4/ton SO2

F1 = 0.0019 Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$

C1 = 198.598 Coal burn, tons/hr

S1 = 0.56 Coal sulfur weighted average, %

K1 = Molecular weight and units conversion constant  
0.02 SO2/%S

K2 = Sulfur conversion to SO2  
0.875  
0.95 for bituminous coals  
0.875 for subbituminous coals  
= 0.55 to 0.85 for lignite, based on the Na content  
1 for oil

$$E2 = K1 \cdot K2 \cdot C1 \cdot S1$$

$$E2 = 0.02 * 0.875 * 198.598 * 0.56$$

E2 = 1.94626 SO2 mass rate, tons/hr

$$EMComb = K * F1 * E2$$

$$EMComb = 3063 * 0.0019 * 1.94626$$

EMComb = 11.32665 total H2SO4 manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ERComb)

Equation 4-3  $ERComb = EMComb \cdot F2$  (all that apply)

$$ERComb = EMComb \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ERComb = 11.32665 * 1 * 0.72 * 1$$

ERComb = 8.155189 total H2SO4 released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EMSCR)

$EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H2SO4 manufactured from SCR, lbs per hour

K = 3063 lb H2SO4/ton SO2

S2 = 0.03 SCR catalyst SO2 oxidation rate (specified as a decimal, typically from 0.001- 0.03)

fsops = 0 no SO2 control at Huntington 2 baseline case

E2 = 1.94626 SO2 produced, tons per hour

F3SCR = 1 Technology Impact Factor, for SCR

$$EMSCR = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$$

$$EMSCR = 3063 * 0.03 * 0 * 1.94626 * 1$$

EMSCR = 0 = Total H2SO4 manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture

$TSAM = EMComb + EMSCR/SNCR +$

$TSAM = EMComb + EMSCR/S1 + EMFGC$

$TSAM = 11.32665 + 0$

$TSAM = 11.32665 =$  Total H2SO4 manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5 ERSCR = [EMSCR - (Ks • B • fsreagent • SNH3)] • F2x

ERSCR = Total H2SO4 released from SCR, lbs per hour

EMSCR = Total H2SO4 manufactured from SCR, lbs per hour

Ks = 3799 Conversion factor

HV = 11560 Btu/lb

B = 0.004592 Coal burn in TBtu/hr

fsreagent = 0 fraction of SCR operation with reagent injection

SNH3 = 0.75 NH3 slip from SCR/SNCR, ppmv at 6% O2, wet

- SCR averages 0.75 ppmv over catalyst guarantee period

- SNCR averages 5 ppmv

- Note: actual NH3 slip data should be used if available

F2x = Technology Impact Factors, all that apply

$$ERSCR = [EMSCR - (Ks \cdot B \cdot fsreagent \cdot SNH3)] \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ERSCR = (0 - (3799 \cdot 0.004592 \cdot 0 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 0.01$$

$$ERSCR = (0 - (0)) \cdot 0.01$$

$$ERSCR = 0$$

ERSCR = 0 Total H2SO4 released from SCR, lbs per hour

Equation 4-11b: Release

TSAR = ERComb + ERSCR/SNCR + ERFGC

TSAR = ERComb + ERSCR/SN + ERFGC

TSAR = 8.155189 + 0 +

**TSAR = 8.155189 Total H2SO4 released, lbs per hour**

Equation 4  $EM_{Comb} = K \cdot F1 \cdot E2$

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

F1 = 0.0019 Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$

C1 = 173.942 Coal burn, tons/hr

S1 = 0.6 Coal sulfur weighted average, %

K1 = Molecular weight and units conversion constant  
0.02 SO<sub>2</sub>/%S

K2 = Sulfur conversion to SO<sub>2</sub>  
0.875  
0.95 for bituminous coals  
0.875 for subbituminous coals  
= 0.55 to 0.85 for lignite, based on the Na content  
1 for oil

$$E2 = K1 \cdot K2 \cdot C1 \cdot S1$$

$$E2 = 0.02 * 0.875 * 173.942 * 0.6$$

E2 = 1.826391 SO<sub>2</sub> mass rate, tons/hr

$$EM_{Comb} = K \cdot F1 \cdot E2$$

$$EM_{Comb} = 3063 * 0.0019 * 1.826391$$

EM<sub>Comb</sub> = 10.62905 total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ER<sub>Comb</sub>)

Equation 4-3  $ER_{Comb} = EM_{Comb} \cdot F2$  (all that apply)

$$ER_{Comb} = EM_{Comb} \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ER_{Comb} = 10.62905 * 1 * 1 * 0.01$$

**ER<sub>Comb</sub> = 0.10629 total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr**

Sulfuric Acid Manufacture by SCR (EM<sub>SCR</sub>)

$$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR = \text{Total H}_2\text{SO}_4 \text{ manufactured from SCR, lbs per hour}$$

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

S2 = 0.03 SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)

fsops = 0.964 for continuous operation

E2 = 1.826391 SO<sub>2</sub> produced, tons per hour

F3SCR = 1 Technology Impact Factor, for SCR

$$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$$

$$EM_{SCR} = 3063 * 0.03 * 0.964 * 1.826391 * 1$$

EM<sub>SCR</sub> = 161.7853 = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture

$$TSAM = EM_{Comb} + EM_{SCR}/SNCR +$$

$$TSAM = EM_{Comb} + EM_{SCR}/S1 + EM_{FGC}$$

$$TSAM = 10.62905 + 161.7853$$

TSAM = 172.4143 = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5 ERSCR = [EMSCR - (Ks • B • fsreagent • SNH3)] • F2x

ERSCR = Total H2SO4 released from SCR, lbs per hour

EMSCR = Total H2SO4 manufactured from SCR, lbs per hour

Ks = 3799 Conversion factor

HV = 11995 Btu/lb

B = 0.004173 Coal burn in TBtu/hr

fsreagent = 0.95 fraction of SCR operation with reagent injection

SNH3 = 0.75 NH3 slip from SCR/SNCR, ppmv at 6% O2, wet

- SCR averages 0.75 ppmv over catalyst guarantee period

- SNCR averages 5 ppmv

- Note: actual NH3 slip data should be used if available

F2x = Technology Impact Factors, all that apply

$$ERSCR = [EMSCR - (Ks \cdot B \cdot fsreagent \cdot SNH3)] \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ERSCR = (161.7853 - (3799 \cdot 0.004173 \cdot 0.95 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 0.01$$

$$ERSCR = (161.7853 - (11.29507)) \cdot 0.01$$

$$ERSCR = 150.4902 \cdot 0.01$$

ERSCR = 1.504902 Total H2SO4 released from SCR, lbs per hour

Equation 4-11b: Release

TSAR = ERComb + ERSCR/SNCR + ERFGC

TSAR = ERComb + ERSCR/SN + ERFGC

TSAR = 0.10629 + 1.504902 +

**TSAR = 1.611193 Total H2SO4 released, lbs per hour**

Equation 4  $EM_{Comb} = K \cdot F1 \cdot E2$

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

F1 = 0.0019 Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$

C1 = 27.606 Coal burn, tons/hr

S1 = 0.76 Coal sulfur weighted average, %

K1 = Molecular weight and units conversion constant  
0.02 SO<sub>2</sub>/%S

K2 = Sulfur conversion to SO<sub>2</sub>  
0.875  
0.95 for bituminous coals  
0.875 for subbituminous coals  
= 0.55 to 0.85 for lignite, based on the Na content  
1 for oil

$$E2 = K1 \cdot K2 \cdot C1 \cdot S1$$

$$E2 = 0.02 * 0.875 * 27.606 * 0.76$$

E2 = 0.36716 SO<sub>2</sub> mass rate, tons/hr

$$EM_{Comb} = K \cdot F1 \cdot E2$$

$$EM_{Comb} = 3063 * 0.0019 * 0.36716$$

EM<sub>Comb</sub> = 2.13676 total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ER<sub>Comb</sub>)

Equation 4-3  $ER_{Comb} = EM_{Comb} \cdot F2$  (all that apply)

$$ER_{Comb} = EM_{Comb} \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ER_{Comb} = 2.13676 * 1 * 0.72 * 1$$

ER<sub>Comb</sub> = 1.538467 total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EM<sub>SCR</sub>)

$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

S2 = 0.03 SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)

fsops = 0 no SO<sub>2</sub> control installed at Carbon 1

E2 = 0.36716 SO<sub>2</sub> produced, tons per hour

F3SCR = 1 Technology Impact Factor, for SCR

$$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$$

$$EM_{SCR} = 3063 * 0.03 * 0 * 0.36716 * 1$$

EM<sub>SCR</sub> = 0 = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture

$TSAM = EM_{Comb} + EM_{SCR}/SNCR +$

$TSAM = EM_{Comb} + EM_{SCR}/S1 + EMFGC$

$TSAM = 2.13676 + 0$

TSAM = 2.13676 = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5  $ER_{SCR} = [EM_{SCR} - (K_s \cdot B \cdot fs_{reagent} \cdot SNH_3)] \cdot F_2x$

$ER_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

$EM_{SCR}$  = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

$K_s$  = 3799 Conversion factor

$HV$  = 12125 Btu/lb

$B$  = 0.000669 Coal burn in TBtu/hr

$fs_{reagent}$  = 0 fraction of SCR operation with reagent injection

$SNH_3$  = 0.75 NH<sub>3</sub> slip from SCR/SNCR, ppmv at 6% O<sub>2</sub>, wet

- SCR averages 0.75 ppmv over catalyst guarantee period

- SNCR averages 5 ppmv

- Note: actual NH<sub>3</sub> slip data should be used if available

$F_2x$  = Technology Impact Factors, all that apply

$$ER_{SCR} = [EM_{SCR} - (K_s \cdot B \cdot fs_{reagent} \cdot SNH_3)] \cdot F_2(AH) \cdot F_2(PM) \cdot F_2(FGD)$$

$$ER_{SCR} = (0 - (3799 \cdot 0.000669 \cdot 0 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 1$$

$$ER_{SCR} = (0 - (0)) \cdot 1 \cdot 1 \cdot 1$$

$$ER_{SCR} = 0$$

$ER_{SCR}$  = 0 Total H<sub>2</sub>SO<sub>4</sub> released from SCR, lbs per hour

Equation 4-11b: Release

$TSAR = ER_{Comb} + ER_{SCR/SNCR} + ER_{FGC}$

$TSAR = ER_{Comb} + ER_{SCR/SN} + ER_{FGC}$

$TSAR = 1.538467 + 0 +$

**$TSAR = 1.538467$  Total H<sub>2</sub>SO<sub>4</sub> released, lbs per hour**

Equation 4  $EM_{Comb} = K \cdot F1 \cdot E2$

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

F1 = 0.0019 Fuel Impact Factor from F1 table

Equation 4  $E2 = K1 \cdot K2 \cdot C1 \cdot S1$

C1 = 42.229 Coal burn, tons/hr

S1 = 0.75 Coal sulfur weighted average, %

K1 = Molecular weight and units conversion constant  
0.02 SO<sub>2</sub>/%S

K2 = Sulfur conversion to SO<sub>2</sub>  
0.875  
0.95 for bituminous coals  
0.875 for subbituminous coals  
= 0.55 to 0.85 for lignite, based on the Na content  
1 for oil

$$E2 = K1 \cdot K2 \cdot C1 \cdot S1$$

$$E2 = 0.02 * 0.875 * 42.229 * 0.75$$

E2 = 0.554256 SO<sub>2</sub> mass rate, tons/hr

$$EM_{Comb} = K \cdot F1 \cdot E2$$

$$EM_{Comb} = 3063 * 0.0019 * 0.554256$$

EM<sub>Comb</sub> = 3.225601 total H<sub>2</sub>SO<sub>4</sub> manufactured from combustion, lbs/hr

Sulfuric Acid Released from Combustion (ER<sub>Comb</sub>)

Equation 4-3  $ER_{Comb} = EM_{Comb} \cdot F2$  (all that apply)

$$ER_{Comb} = EM_{Comb} \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ER_{Comb} = 3.225601 * 1 * 0.72 * 1$$

ER<sub>Comb</sub> = 2.322433 total H<sub>2</sub>SO<sub>4</sub> released from combustion, lbs/hr

Sulfuric Acid Manufacture by SCR (EM<sub>SCR</sub>)

$$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR = \text{Total H}_2\text{SO}_4 \text{ manufactured from SCR, lbs per hour}$$

K = 3063 lb H<sub>2</sub>SO<sub>4</sub>/ton SO<sub>2</sub>

S2 = 0.03 SCR catalyst SO<sub>2</sub> oxidation rate (specified as a decimal, typically from 0.001- 0.03)

fsops = 0 no SO<sub>2</sub> controls installed at Carbon 2

E2 = 0.554256 SO<sub>2</sub> produced, tons per hour

F3SCR = 1 Technology Impact Factor, for SCR

$$EM_{SCR} = K \cdot S2 \cdot fsops \cdot E2 \cdot F3SCR$$

$$EM_{SCR} = 3063 * 0.03 * 0 * 0.554256 * 1$$

EM<sub>SCR</sub> = 0 = Total H<sub>2</sub>SO<sub>4</sub> manufactured from SCR, lbs per hour

Equation 4-11a: Manufacture

$$TSAM = EM_{Comb} + EM_{SCR}/SNCR +$$

$$TSAM = EM_{Comb} + EM_{SCR}/S1 + EM_{FGC}$$

$$TSAM = 3.225601 + 0$$

TSAM = 3.225601 = Total H<sub>2</sub>SO<sub>4</sub> manufactured, lbs per hour

Sulfuric Acid Released from SCR and SNCR

Equation 4-5 ERSCR = [EMSCR - (Ks • B • fsreagent • SNH3)] • F2x

ERSCR = Total H2SO4 released from SCR, lbs per hour

EMSCR = Total H2SO4 manufactured from SCR, lbs per hour

Ks = 3799 Conversion factor

HV = 12128 Btu/lb

B = 0.001024 Coal burn in TBtu/hr

fsreagent = 0 fraction of SCR operation with reagent injection

SNH3 = 0.75 NH3 slip from SCR/SNCR, ppmv at 6% O2, wet

- SCR averages 0.75 ppmv over catalyst guarantee period

- SNCR averages 5 ppmv

- Note: actual NH3 slip data should be used if available

F2x = Technology Impact Factors, all that apply

$$ERSCR = [EMSCR - (Ks \cdot B \cdot fsreagent \cdot SNH3)] \cdot F2(AH) \cdot F2(PM) \cdot F2(FGD)$$

$$ERSCR = (0 - (3799 \cdot 0.001024 \cdot 0 \cdot 0.75)) \cdot 1 \cdot 1 \cdot 1$$

$$ERSCR = (0 - (0)) \cdot 1 \cdot 1 \cdot 1$$

$$ERSCR = 0$$

ERSCR = 0 Total H2SO4 released from SCR, lbs per hour

Equation 4-11b: Release

TSAR = ERComb + ERSCR/SNCR + ERFGC

TSAR = ERComb + ERSCR/SN + ERFGC

TSAR = 2.322433 + 0 +

**TSAR = 2.322433 Total H2SO4 released, lbs per hour**

The following are the special assumptions, knowns and other items of interest involved in the calculations expressed in the previous tabs:

1. The spreadsheet calculations were made according to the version of the spreadsheet sent to UDAQ by EPA. This appears to correspond to a version of the EPRI document from 2012. However, it does not match the document 1023790 downloaded from EPA's website. This can be verified by referencing the equation numbers referred to within the 1023790 document and those listed on the "Explain" tab. The equation reference numbers tend to differ slightly, although the content of the equation itself is identical.
2. In several places throughout this methodology specific values needed to be supplied which were unavailable at the time of calculation. These values were typically site specific values or estimations of SCR performance (SCR oxidation rate) based on available coal data which could only be obtained through testing. The plants in question - Hunter Units 1, 2, and 3; Huntington 1 and 2; and Carbon Units 1 and 2 - burn a blend of Western sub-bituminous and bituminous (primarily sub-bituminous), low sulfur, low alkaline, coal which is unlike any other fuel type tested or estimated through the EPRI estimation methodology. The closest analogue would be PRB coal, which is higher in both alkalinity and heating value, and was tested primarily in Eastern plants which had switched over from higher sulfur coal to PRB. Although this allowed for some reasonable estimation in the assigning of the various factors - in other cases, some experimentation with the equations was called for.
3. As no power plant burning Utah coal currently operates with an SCR system installed, determining an appropriate SCR oxidation value to use required an analysis of the equation. Eventually, it was determined that using the highest oxidation value of 3% (yielding an S2 factor of 0.03) resulted in the highest possible sulfate value, and the most realistic release totals.
4. The FGD system at Hunter 3 is an upgraded wet scrubber followed by a particulate filter baghouse. Although the total control for this system in terms of SO<sub>2</sub> emission is similar to the dry lime injection/baghouse systems currently installed at Hunter Units 1 and 2 and Huntington 1 and 2, the EPRI technology factors (F2) for this system are not precisely defined. Rather than using a single F2 factor of 0.01 as was the case for the Post-Control scenarios for the BART units, a hybrid F2 factor of 0.1 \* 0.4 was generated by using the F2(PM) and F2(FGD) factors as found on the "F2" tab. This yielded a resulting F2 factor of 0.04 which is quite similar, and agrees well with observed SO<sub>2</sub> emissions from Unit 3.
5. The BART units (Hunter 1 and 2 and Huntington 1 and 2) were previously equipped with cold side ESPs for particulate control, and (with the exception of Huntington 2) first generation wet scrubbers for control of SO<sub>2</sub> emissions. Huntington Unit 2 was uncontrolled for SO<sub>2</sub> in the baseline case. Therefore, the technology factors chosen were F2(PM) = 0.72 and F2(FGD) = 0.73, Huntington 2's F2(FGD) was set at 1.
6. Following the installation of Modeling Scenario 1 controls (LNB/OFA + FGD/Baghouse) these technology factors were updated. As the installation of the Dry FGD system includes the effect of the baghouse, no particulate control mechanism needs to be included. Although not specifically discussed in the EPRI document under particulate control. UDAQ believes that the effect of "double counting" the impact of particulate control upon H<sub>2</sub>SO<sub>4</sub> release would be excessive. Although the purpose of FGD systems is to remove acid gas emissions; no system is perfectly efficient, and the technology factor assigned to FGD/baghouse systems is already quite good. Therefore for all BART Post scenarios, F2(PM) was set at 1, while F2(FGD) was set at 0.01 as per Table 4-5.
7. Baseline emissions were based on 2003 emission inventory values. This year contained the most up-to-date record of coal burn data, hours of operation coal sulfur weight percentage, and emission inventory data available from the baseline period (2001-2003). Post-control emissions were based on the 2012 and 2013 emission year inventories. Coal sulfur contents rose slightly between 2003 and 2013, although sulfate emissions generally dropped.
8. Carbon Units 1 and 2 are based solely on emissions from 2012/2013. As the effect of shutting down the Carbon Plant is based on removing actual emissions. Those emissions must be calculated using the definition of actual emissions - most commonly this is defined as the emissions from the two-year period immediately preceding the change. Without inventory data currently available from the 2014 reporting year, the two-year period immediately preceding this action would be the 2012-2013 inventory periods.

9. Although each tab shows a section where the "effect" of SCR/SNCR is apparently included, a quick review of the baseline tabs will reveal that this is reduced to zero (0) by setting  $F_{sops} = 0$ . Similarly, the effect of ammonia slip is also reduced to zero (0) in the baseline tabs as  $F_{sreagent}$  has also been set to 0.

10. The GivenAssume tab was used as an input tab, and is not to be used as a representation of the values for all individual calculation tabs. Rather each individual calculation tab (such as "Hunter 1 Baseline") should be viewed independently of the others. These tabs were generated by plugging the appropriate values into the "GivenAssume" tab and then copying/pasting the values directly from the "Calculate" tab once generated. This way the work could be replicated by inserting the same input values. The appropriate values have been highlighted on each tab. Red highlights serve as inputs, these items can be found on both the "Baseline" and "Post" tabs. Purple highlights on the "Post" tabs designate the ERcomb values which is also the release value for each plant under Modeling Scenario 1 (LNB/OFA +FGD/Baghouse) but prior to the installation of SCR. Finally Green highlights designate the final release values for each plant for that particular tab. For the Baseline tabs, this is the total amount. For the Post tabs, this value represents the effect of SCR - in addition to the Scenario 1 controls already present.