Alabama's Perspectives on ACE Implementation

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BACKGROUND

- From 1970’s to early 2000’s: Ten coal-fired plants with about 40 units owned by three utilities

- 2020: Four plants with coal as fuel encompassing ten units owned by one utility

- One of these plants has four units and is regulated by an autonomous local air agency
- Nine of the ten units have full suites of controls: particulate, SO_2, NO_x, mercury
- The one outlier may be on its last legs

The Numbers

- Assume a 35% thermal efficiency (BTU's in versus Kilowatts out)
- Expected efficiency increase by applying EPA's six candidate technologies: 5%
- Thermal efficiency rises 5% to about 37%

- Our utility indicates that about 50% of candidate technologies are already installed

- Therefore, expected thermal efficiency increase is about 1%, if remaining candidate technologies are cost-effective and are installed

Current Status

- ADEM has held several meetings with the utility
- Utility has hired consultant and is crunching numbers

Plans and Concerns

- ADEM plans to implement ACE using T5 permits
- Do we have expertise to review calculations of cost effectiveness?
- Difficulty in getting averaging times and in measuring a small increase in efficiency

- Is acquiring such expertise worth it?
- Will conclusions on cost effectiveness be second-guessed by NGO's, EPA, the regulated entity, etc.?
- How to handle starts and stops due to court rulings, changes in policy by EPA, etc.?