

# **Appendix P**

## **BART Model Plant Criteria with PM**

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# Model Plant Criteria

- $E < 500$  tons &  $d > 50$  km
- $E < 1000$  tons &  $d > 100$  km
  - $E$  = potential emissions of “SO<sub>2</sub> or NO<sub>x</sub> or SO<sub>2</sub> + NO<sub>x</sub>”
  - $d$  is the distance to closest Class I area
- In the Southeastern U.S., SO<sub>2</sub> (sulfate) typically has larger impact on light extinction than NO<sub>x</sub> (nitrate).
  - Conservative approach would be to assume 100% SO<sub>2</sub> emissions
- **What about adding PM to the model plant criteria?**

# Light Extinction

- $f(rh)$  ranges from 2.3 - 4.7 with an average value of 3.2 in the VISTAS states
- Average contributions to  $b_{ext}$  ( $Mm^{-1}$ )
  - Sulfate =  $3*f(RH)*[SO_4] = 9.6*[SO_4]$ 
    - $[SO_4]$  assumed to be in form of  $(NH_4)_2SO_4$
  - Nitrate =  $3*f(RH)*[NO_3] = 9.6*[NO_3]$ 
    - $[NO_3]$  assumed to be in form of  $NH_4NO_3$
  - Elemental Carbon =  $10*[EC]$
  - Organic Carbon =  $4*[ORG]$
  - Soils =  $1*[Soils]$
  - Coarse Mass =  $0.6*[PMC]$
- Conservative approach is to assume all PM is PM2.5
  - $[PMC]=0$

# SO<sub>2</sub> vs. PM Emissions

- SO<sub>2</sub> does not impact light extinction
- Only a fraction of the SO<sub>2</sub> becomes SO<sub>4</sub> PM
- How much?
  - Function of SO<sub>2</sub> to SO<sub>4</sub> conversion rate
  - Function of distance downwind
  - Function of wind speed
- 100% of primary PM becomes PM
  - Speciation of PM will impact light extinction

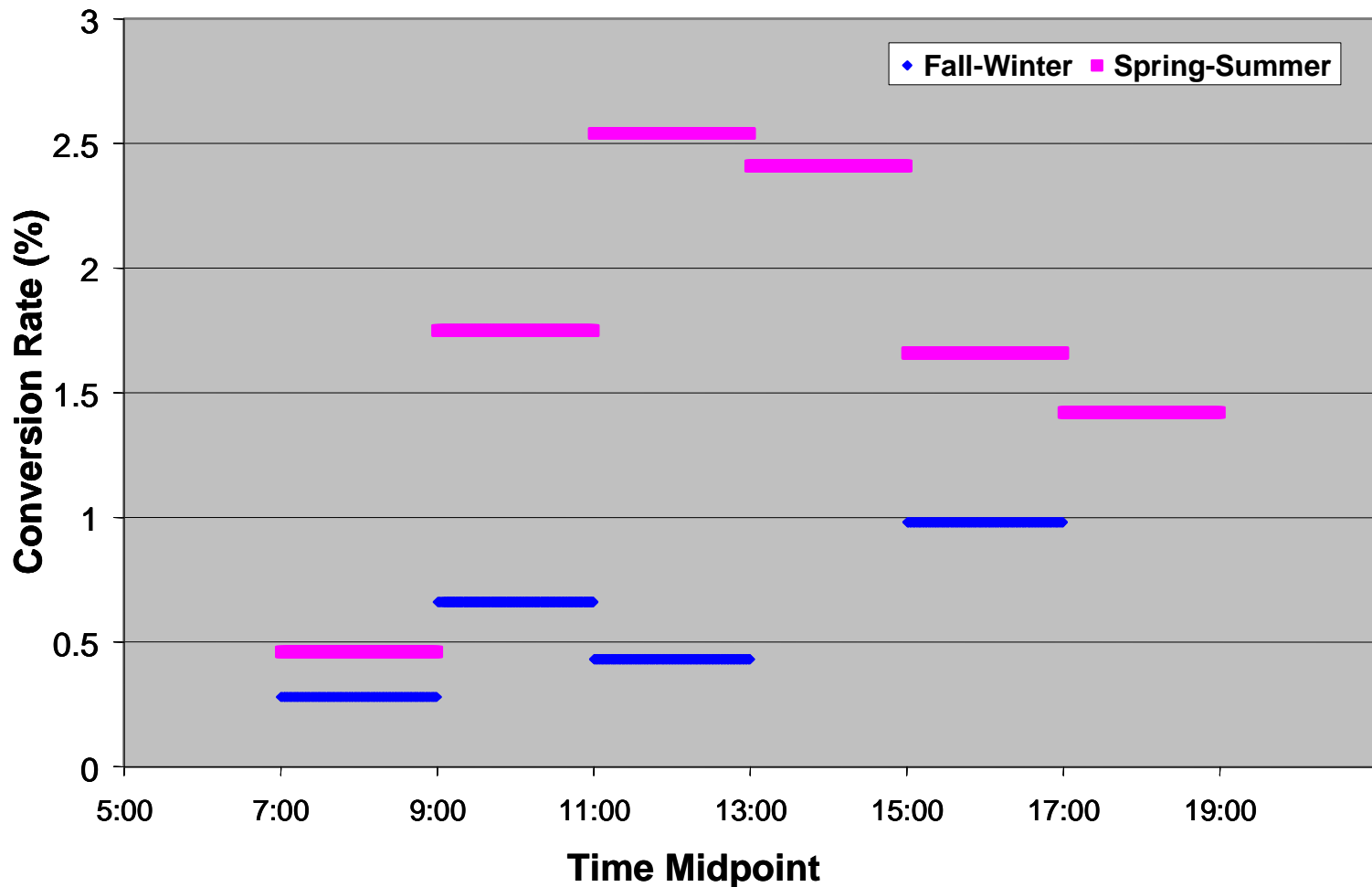
# Conversion Factor

- Calculate a “**PM factor**” to relate primary PM to secondary sulfate PM from SO<sub>2</sub>
  - e.g.,  $E = \text{SO}_2 + \text{NO}_x + 10 * \text{PM}$
- Lower SO<sub>2</sub> to SO<sub>4</sub> conversion results in higher PM factor
  - Higher PM factor is more conservative
- Conversion of 1 ton SO<sub>2</sub> (MW=64) will produce 2.0625 tons (NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub> (MW=132)

# Example

- Assume all primary PM is sulfate and ignore dry deposition
- 100 tons SO<sub>2</sub> with 5% conversion rate
  - 100 tons SO<sub>2</sub> \* 5% conversion  
= 5 tons \* 2.0625  
= 10.3125 tons SO<sub>4</sub> PM produced
  - 100 tons PM = 100 tons PM
- $E = \text{SO}_2 + \text{NO}_x + (100/10.3125)*\text{PM}$   
= SO<sub>2</sub> + NO<sub>x</sub> + 9.7\*PM  
= SO<sub>2</sub> + NO<sub>x</sub> + 10\*PM

# Mean SO<sub>2</sub> Conversion Rate in Power Plant Plume by Season and Time of Day





# Assumptions

- Distance downwind = 50 km (31 miles)
  - Model plant criteria distance
- SO<sub>2</sub> to SO<sub>4</sub> conversion rate = 1.5% per hour
  - Max. sulfate production is during summer
  - Lower conversion rate produces higher PM Factor
- Wind speed = 5 m/s (11.2 mph)
  - Higher wind speeds produce higher PM Factor
  - Max. sulfate production occurs at lower WS
    - Likely < 5 m/s
  - $t = 31 \text{ miles} / 11.2 \text{ mph} = 2.77 \text{ hours}$

# PM Factor

- $\text{SO}_2$  conversion =  $1.5\% * 2.77 \text{ hours} = 4.15\%$ 
  - $100 \text{ tons SO}_2 * 4.15\% \text{ conversion}$   
 $= 4.15 \text{ tons} * 2.0625$   
 $= 8.56 \text{ tons SO}_4 \text{ PM produced}$
  - $100 \text{ tons PM} = 100 \text{ tons PM}$
- $E = \text{SO}_2 + \text{NO}_x + (100/8.56)*\text{PM}$   
 $= \text{SO}_2 + \text{NO}_x + 11.7*\text{PM}$   
 $= \text{SO}_2 + \text{NO}_x + 12*\text{PM}$ 
  - Assumes all primary PM is sulfate

# PM Speciation

- Not all primary PM will be sulfate
- Scale components of PM by ratio of species extinction coefficient to average sulfate extinction coefficient (9.6)
- $E = \text{SO}_2 + \text{NO}_x + 12 * \text{PM} * [(\% \text{SO}_4) * (9.6 / 9.6) + (\% \text{NO}_3) * (9.6 / 9.6) + (\% \text{EC}) * (10 / 9.6) + (\% \text{OC}) * (4 / 9.6) + (\% \text{Soils}) * (1.0 / 9.6)]$
- $E = \text{SO}_2 + \text{NO}_x + 12 * \text{PM} * [(\% \text{SO}_4) + (\% \text{NO}_3) + 1.04 * (\% \text{EC}) + 0.42 * (\% \text{OC}) + 0.1 * (\% \text{Soils})]$

# International Paper - Savannah

- SO<sub>2</sub>=0.0 tons, NO<sub>x</sub>=0.0 tons, PM=51.4 tons
- Distance to nearest Class I area = 83.6 km
  - Need  $E < 500$  tons to be exempt
- Assume 100% primary PM is sulfate
  - $E = 12 * 51.4 = 616.8$  tons ( $> 500 \rightarrow$  not exempt)
- PM Speciation from SMOKE profile (AP-42)
  - SO<sub>4</sub>=20.40%, NO<sub>3</sub>=0.37%, EC=2.62%,  
OC=35.69%, Solids=40.91 %
  - $E = 12 * 51.4 * [(0.204) + (0.0037) + 1.04*(0.00262) + 0.42*(0.3569) + 0.1*(0.4091)]$
  - $E = 263.0$  tons ( $< 500 \rightarrow$  EXEMPT!!)