Mary McAuliffe
03/06/2001 05:06 PM

To: "Stone, Randall"
Subject: Re: Met

Thanks, Randy. I can't remember if I told you that Met's counsel called asking me about modifying the SEP to do another project, something more protective of course. I told them then would need to provide technical justification for us to make that evaluation, and they agreed that was appropriate. Met's counsel asked how we would go about changing the SEP project. Par. 17 discusses modifying the construction or installation date by agreement of the parties, but not the project itself. Par. 68 refers you back to the text of the CD for handling mods. Par. 67 says everything else needs court approval. I think we need the court's permission to change the SEP. If that's your take, either you or I can communicate that to our friends in MN. In any case, I haven't received their technical justification yet--I'm sure it's in (first class) mail.
"Stone, Randall" <RStone@ENRD.USDOJ.GOV> on 03/06/2001 05:00:41 PM

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To: Mary McAuliffe

① 3 conflicting provisions
② even if could, should we do this w/o ct approval when < 2 mos since ct wrote order, incl. SEP, SEP raised by commenter, SEP identified by ct as element of settlement - cannot do this w/o ct approval.
- Material issue -
- SEP Policy

Mary -

1) Today I received copies of 3 deliverables under the CD: (i) a SEP description, (ii) a Wet Scrubber Preventative Maintenance Plan, and (iii) an Operator Training Plan. It looks like copies were sent to the Chief of the Air Branch too, but let me know if you or anyone else need copies from me.

2) We sent Fred S. a message asking him to get us a copy of the signed CD itself, but we haven't yet seen anything from him. I've checked an on-line copy of the case docket and don't see any indication that the CD itself was docketed. I'm thinking that the Judge entered the order we've seen, but didn't realize that he needs to sign and enter the CD itself. I'll follow-up.

- Randy

4/11/01 Call w/ Met Council - Randy Stone, Bob Cattanach - Mark Thompson - Met
Comments on CD prior to entry - review of CD.
Greenwood raised issue w/ SEP - told ct was good, appropriate SEP, etc. - in ct order approving CD in Feb, judge reviewed key elements - ct specified that
RS - what are exigencies on times?
Design / building - performance standards
Have info from vendor w/ specs -
Cost proposal for project as bid -
Need to make decision about what is going on now.
D-6 proposed alt technology, same fr
4/20 - deadline.

Mary McAuliffe
04/06/2001 09:37 AM

To: rstone
Subject: Met SEP

Randy, on April 4th, Met called about wanting to revise the SEP. Apparently, there is some urgency in needing to move forward on the SEP in the short run. On April 5th, I heard from Dave Schulz regarding Met Council proposal to install baghouse w/carbon injection as SEP rather than dry ESP w/carbon injection. According to Dave, generally, a baghouse with carbon injection will be more effective at both particulate and mercury reduction for two reasons:

1. Baghouse is more effective on consistent basis for fine particulate removal
2. For mercury removal, get additional mercury capture in the filter cake as carbon particles impregnated in ash layer within the filter bags.

Therefore, generally, both particulate, especially fine particulate emissions, and mercury removal will be enhanced with baghouse w/ carbon injection over ESP w/carbon injection. Obviously, this depends on the design specifics of the baghouse.

According to Dave, the effectiveness of the baghouse is dependent on the collector needing to be properly sized, the air to cloth ratio–generally, if the design is being done by a reputable engineering firm, the baghouse option is better.

I called Dorsey & Whitney, and asked if they could get us the baghouse specs--they will try to fax them today.