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March 2, 1983

FILE NO. _____

RECEIVED
MAR 3 1983
Utah State Div. Of
Environmental Health

Dr. Brent Bradford
Bureau of Air Quality
150 West North Temple
Suite 426
Salt Lake City, UT 84110-2500

Re: Nitrogen-Oxide Recovery Efficiencies of the Intermountain Power Project

Dear Dr. Bradford:

Since our last communication, I have made inquiries with respect to the current status of Selective Catalitic Reduction (SCR) technology.

On the 24th of February, 1983, I contacted by telephone Alan Goodley, Chief of the Energy Strategy Development Branch of the Stationary Source Control Division of the California Air Resources Board. In that telephone conversation, Mr. Goodley indicated to me that SCR is currently a commercially available technology for the control of NOx. Mr. Goodley also indicated that the three major boiler manufacturers in the United States; Combustion Engineering, Babcock Wilcox, and Foster Wheeler are all licensed to sell SCR technology in conjunction with their manufacture of boilers for coal-fired power plants.

You will note that on the inside cover of the study, "Proposed Guidelines for the Control of Emmissions from Coal-Fired Power Plants," of which you have a copy, that Mr. Goodley appears as a reviewer of that study. Mr. Goodley informs me that since that report was written, more SCR tests have been completed. These tests were completed at the Takehara Power Plant of the Electric Power Development Company of Japan. In that test SCR was installed on a 250 megawatt unit which has been in operation for over a period of one year. He also indicates that SCR technique is planned for nine coal-fired power plants in Japan. One of these plants, a Takehara Power Plant of 700 megawatts, will go into operation July 1, 1983. Another of the plants for which SCR is planned is a 1000 megawatt unit.

Mr. Goodley also provided me with information with respect to the costs of this technique. Cost information is also available

on page iii of the prior referenced study. Mr. Goodley informs me that his calculations of the costs of increasing the recover efficiency of NOx of a 1500 megawatt unit, from 37.5% to between 80%-90% would be approximately 105 million dollars. He also indicates that that sum translates into approximately 5% of the total capital costs of such a project. On page iii of the aforementioned study, the authors state that the costs of upgrading the recovery efficiencies with respect ot NOx would be between 4 to 6 mills per kilowatt hour.

I forward this information so that you may be aware of the current status of the SCR technology. It would appear from preliminary examination that the additional cost to the IPP for recovery of these pollutants is neither excessive, nor overly burdensome. I am informed by Mr. Goodley that Air Resouces Board of California has taken the position that these costs are in line with the cost currently incurred by the use of NOx controls in automobiles.

Based upon this information, it would seem apparent that the technology for the control of NOx on this plant is commercially available. The remaining questions with reference to whether or not the IPP should be required to employ SCR technology involve the negative impacts of failing to require the application of SCR. I believe it will be the position of the groups which I have contacted that the costs of implementing this technology pale in comparison to the detrimental effects of failing to require that technology. With this in mind, we will attempt to acquire information substantiating the negative impacts of NOx pollutants. We also believe that the Bureau should turn a critical eye to the negative impacts of failing to require this technology. We believe that aesthetical, economic, health and safety factors are among many considerations which should be weighed in determining whether SCR technology should be applied to this project.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Sherman C. Young

SHERMAN C. YOUNG

SCY:dea