

# NATURAL GAS - COMBINED CYCLE POWER GENERATION PERMITTING

Presented to PBI Environmental Law Forum  
by ALL4

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## Agenda

- Recent history of energy projects in Pennsylvania
- Current energy projects
- Legal & permitting challenges for energy projects
- Working with the Department
- Timing & coordination of other environmental permitting obligations

# Energy Projects in PA

Changing landscape of power



## Recent History of Energy Projects

- 10 year lookback:
  - 11 Coal-fired power plants shutdown since 2010
  - 16 NGCC plants permitted since 2011
  - Coal-to-gas conversions
- Early benefits:
  - Replacing coal-fired and aging plants
  - New NGCC plants require smaller footprints
  - Less strain on local resources
  - Emission reductions

## Current Energy Projects

- Why, where, how
- Quantity of new NG energy in PA
- Commitment to constant operation
- Swing/peak vs. Base load systems
- Not a lot of remaining coal to replace
- Securing financing/meeting construction milestones
- PJM Queue

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## Permitting Challenges

- PSD/NNSR
  - BACT and LAER demonstrations
- Emission reduction credits – VOC/NOx
- GHG BACT – Btu/kW-hr demonstration – inconsistent permit requirements regionally
- CEMS implementation, review, approval – phased approach
- Frequency of 3<sup>rd</sup> party interveners

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## Working with the Department

- Perception: new energy projects are “good projects”
  - Reduction in coal firing, use of local NG fuel resources
  - Net air quality improvements
  - Ambient standards
- Current backlog:
  - Permit review/approval/public comment/hearings
  - Modeling
  - CEMS implementation

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## Overcoming Permit Challenges

- ERCs – Inter-pollutant trading
- CEMS – working with your team early & a lot
  - Getting nuances approved, sorted out
- Emissions testing requirements
- Lower ammonia slip
- Lower NO<sub>x</sub>, CO – maintaining controls to meet limits

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# Questions & Open Discussion

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