

Cushing, Thomas (DEP)

From: Cushing, Thomas (DEP)
Sent: Monday, August 03, 2020 5:56 PM
To: Barry Goodrich (LBGoodrich@spectraenergy.com); Brown, Kate (KBrown@spectraenergy.com)
Subject: Algonquin request for clarifying information

Based on my continuing review of your BACT addendum and supporting information, I am requesting clarification on the following:

1. In the "Addendum to nonMajor CPA" (file name Final Algonquin Atlantic Bridge Weymouth...) Table 4-1 identified a gearbox efficiency and a motor efficiency 94.4% and 97.13% respectively. Please identify the basis of these efficiencies.
2. Certain Capital costs such as, but not necessarily limited to costs associated with periodic CO catalyst change out were not included in the BACT cost analysis. Please ensure that costs associated with periodic CO catalyst change out and any other capital costs associated with the EMD or the turbine are included in the BACT cost analysis.
3. Certain annual costs, such as routine compliance testing were not included in the BACT cost analysis. Please ensure that all annual costs associated with the EMD or turbine are included in the BACT cost analysis.
4. The pre-filed testimony of Barry Goodrich, Appendix 1 consists of a letter from Solar dated July 23, 2020 which states the annual maintenance cost differential between the EMD and the turbine is \$207,403.11 per year. Please identify the types of maintenance costs associated with the turbine and the EMD that were included in this cost differential.
5. The BACT analysis for the EMD used a project life expectancy of 50 years and an interest rate of 10.137% whereas the BACT analysis for the SCR in the initial application was based on equipment life expectancy of 20 years and an interest rate of 7%. Please explain the basis for the change in assumptions.
6. The BACT addendum, Table 4-9 establishes baseline emissions based on emission limits in Table 8A of the August 29, 2019 Plan Approval. Section 4.4.3.3.1 of the BACT Addendum discusses the basis for the baseline emissions for NOx. Please provide a discussion of baseline emissions for each pollutant. In particular, please discuss why the baseline for CO and VOC are based on emissions post control (oxidation catalyst).

To aid in my timely review, please submit the response to each item as soon as it is ready.

Please contact me if you have any questions.

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