

For Office Use Only Executive Office of Environmental Affairs
MEPA Analyst: <i>DEIRDRE DUCKLEY</i>
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NPC

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

Project Name: Brayton Point Station Air Pollution Control Project		EOEA #: 13022
Street: 1 Brayton Point Road		
Municipality: Somerset	Watershed: Mt. Hope Bay	
Universal Transverse Mercator Coordinates: Zone 19 (X,Y) 317721, 4620692	Latitude: 41.7171 N	Longitude: 71.1912 W
Status of project construction:	70 %complete	
Proponent: Dominion Energy Brayton Point, LLC		
Street: One Brayton Point Road		
Municipality: Somerset	State: MA	Zip Code: 02725
Name of Contact Person From Whom Copies of this NPC May Be Obtained: Meredith Simas		
Firm/Agency: Dominion Energy Brayton Point, LLC	Street: One Brayton Point Road	
Municipality: Somerset	State: MA	Zip Code: 02725
Phone: 508-646-5338	Fax: 888-284-2888	E-mail: meredith.simas@dom.com

In 25 words or less, what is the project change? Constructing a dry scrubber instead of a wet scrubber for SO2 control on Unit 3, reducing wastewater by 592,600 gallons per day and eliminating the need for a 500 foot stack.

Date of ENF filing or publication in the Environmental Monitor: Published in Volume 59, Issue 12 dated April 22, 2003

Was an EIR required? Yes No; if yes,
 was a Draft EIR filed? Yes (Date:) No
 was a Final EIR filed? Yes (Date:) No
 was a Single EIR filed? Yes (Date:) No

Have other NPCs been filed? Yes (Date(s): 8/04, 2/06) No

If this is a NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to "ATTACHMENTS & SIGNATURES" on page 4.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified state permits, financial assistance, or land transfers not previously reviewed:

Modified 7.29 Emission Control Plan and 7.02 air plan approval; New EPA Prevention of Significant Deterioration (PSD) air permit.

Are you requesting a finding that this project change is insignificant? (see 301 CMR 11.10(6))

Yes No; if yes, attach justification.

Are you requesting that a Scope in a previously issued Certificate be rescinded?

Yes No; if yes, attach the Certificate

Are you requesting a change to a Scope in a previously issued Certificate? Yes No; if yes, attach Certificate and describe the change you are requesting:

Summary of Project Size & Environmental Impacts	Previously reviewed	Net Change	Currently Proposed
LAND			
Total site acreage	~ 250 acres	No change	~ 250 acres
Acres of land altered	~ 1 acre	No change	~ 1 acre
Acres of impervious area	~ 35.2 acres	No change	~ 35.2 acres
Square feet of bordering vegetated wetlands alteration	0	No change	0
Square feet of other wetland alteration	38,144	No change	38,144
Acres of non-water dependent use of tidelands or waterways	0	No change	0
STRUCTURES			
Gross square footage	~671,000	No change	~671,000
Number of housing units	0	No change	0
Maximum height (in feet)	505 feet	-138.25	366.75 feet
TRANSPORTATION			
Vehicle trips per day	285.5-300.5	No change	285.5-300.5
Parking spaces	220	No change	220
WATER/WASTEWATER			
Gallons/day (GPD) of water use	~2,480,000	-885,000	~1,595,000
GPD water withdrawal	0	No change	0
GPD wastewater generation/ treatment	~593,600	-592,600	1,000
Length of water/sewer mains (in miles)	1.8	No change	1.8

Does the project change involve any new or modified:

1. conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? Yes No

2. release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? Yes No

3. impacts on Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities? Yes No

4. impact on any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes No; if yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources? Yes No [n/a]

5. impact upon an Area of Critical Environmental Concern? Yes No
If you answered 'Yes' to any of these 5 questions, explain below:

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

(a) a brief description of the project as most recently reviewed

(b) a description of material changes to the project as previously reviewed,

(c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and

(d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a proposed modification of the Section 61 Finding (or it will be required in a Supplemental EIR).

ATTACHMENTS & SIGNATURES

Attachments:

- 1. Secretary's most recent Certificate on this project
- 2. Plan showing most recent previously-reviewed proposed build condition
- 3. Plan showing currently proposed build condition
- 4. Original U.S.G.S. map or good quality color copy (8-1/2 x 11 inches or larger) indicating the project location and boundaries
- 5. List of all agencies and persons to whom the proponent circulated the NPC, in accordance with 301 CMR 11.10(7)

Signatures:

<u>Diane G. Leopold</u>		<u>8/25/08</u>	
Date	Signature of Responsible Officer or Proponent	Date	Signature of person preparing NPC (if different from above)

<u>Diane G. Leopold</u>	_____
Name (print or type)	Name (print or type)

<u>Dominion</u>	_____
Firm/Agency	Firm/Agency

<u>5000 Dominion Blvd.</u>	_____
Street	Street

<u>Glen Allen, VA 23060</u>	_____
Municipality/State/Zip	Municipality/State/Zip

<u>804-273-3641</u>	_____
Phone	Phone

DOMINION ENERGY BRAYTON POINT STATION, LLC

AIR POLLUTION CONTROL PROJECT

MEPA NOTICE OF PROJECT CHANGE

The project change description should include:

- (a) a brief description of the project as most recently reviewed
- (b) a description of material changes to the project as previously reviewed,
- (c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and
- (d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a proposed modification of the Section 61 Finding (or it will be required in a Supplemental EIR).

(a) a brief description of the project as most recently reviewed

The proposed project consists of an air pollution control project to comply with 310 CMR 7.29 Emissions Standards for Power Plants. These regulations were promulgated on May 11, 2001 to make significant reductions in Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), Carbon Dioxide (CO2) and Mercury (Hg) emissions from the existing power plants operating in the state.

(b) a description of material changes to the project as previously reviewed

All equipment associated with the project has been constructed, except for the Unit 3 scrubber. The material change to the project is the construction and installation of a dry scrubber rather than a wet scrubber on Unit 3. The table below compares prior certificate language to the modified project.

CHANGES FROM 2003 ENF CERTIFICATE AND 2006 NPC CERTIFICATE LANGUAGE

<u>Certificate Language</u>	<u>Dominion Comments</u>
[2006] The project will reduce actual NOx emissions by approximately 60%, from 12,976 tons per year (tpy) to 5,372 tpy, SO2 emissions by approximately 50%, from 42,521 tpy to 23,988 tpy, Carbon Monoxide (CO) emissions by 4 tpy, and Sulfuric Acid Mist (H2SO4) by 15 tpy. The project change will reduce Hg emissions by 88 to 127 pounds per year.	The Unit 1, 2, and 3 scrubbers each reduce SO2 by 90%. There should be less sulfuric acid mist using the dry scrubber technology vs. the same capacity wet scrubber.

<u>Certificate Language</u>	<u>Dominion Comments</u>
<p>[2003] The... project will achieve required emission reductions... through the use of a Wet Flue Gas Desulfurization (FGD) process to reduce SO₂ by approximately 50%, from 42,521 tpy to 23,988 tpy... Unit 3 will be retrofit with the FGD technology using limestone as the reagent. The waste product of the FGD system, gypsum, will be recycled for use in wallboard production.</p>	<p>The... project will achieve required emission reductions... through the use of a dry scrubber to reduce SO₂ by approximately 90%... Unit 3 will be retrofit with dry scrubber technology using lime as the reagent. The waste product of the dry scrubber system, mainly calcium sulfite, will either be transported off site to a lined landfill or for beneficial reuse.</p>
<p>[2006] The project is subject to environmental review pursuant to Section 11.03 (8)(b)(2) because it requires a state permit and consists of a modification of an existing major stationary source resulting in a "significant net increase" in actual emissions of greater than 15 tpy of particulate matter (PM) as PM₁₀. In this case, the increase in PM₁₀ is not a result of the combustion process but, rather, a byproduct of the air pollution control equipment that will be installed to achieve significant reductions in NO_x and SO₂.</p>	<p>The "significant net increase" continues to exist for the modified project. Because of regulatory changes, the project is now subject to EPA review under the Prevention of Significant Deterioration, and the permitting will include a review of particulate matter less than 2.5 microns (PM_{2.5}) which is a subset of PM₁₀.</p>
<p>[2003] Results of conservative, worst case ambient air quality modeling of the PM₁₀ emissions (existing plus projected new), conducted in conformance with US EPA modeling guidelines, indicate that the project will not cause or contribute to an exceedance of the National Ambient Air Quality Standards (NAAQS) for PM₁₀.</p>	<p>Air quality dispersion modeling will be performed pursuant to protocols submitted to USEPA and MassDEP February 28, 2008. Model results will be submitted in the EPA (PSD) and Mass DEP (air plan approval) applications. We fully expect the model results will show that the project will not cause or contribute to the exceedance of particulate NAAQS.</p>
<p>[2003] A new emissions stack will be constructed south of the existing facility to support the FGD system and will be approximately 500 feet tall.</p>	<p>A new stack will not be required for the Unit 3 dry scrubber and will instead utilize the existing stack at El. 366'9".</p>
<p>[2003] The new air pollution control system will require an additional 870,000 gpd of water.</p> <p>[2006] Environmental impacts associated with the project change include... a 610,000 gallons per day (gpd) increase in water demand.</p>	<p>The Unit 3 dry scrubber would require 90,000 GPD city water and 822,000 GPD reclaimed water/plant wastewater recycle for a total of 912,000 GPD.</p>

Certificate Language	Dominion Comments
[2003] The increase in discharge will be approximately 100,000 gpd.	Wastewater will be recycled in the Unit 3 dry scrubber, resulting in near-zero discharge during normal operation, except for sump, truck and equipment washes.

(c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6)

Each standard is listed below, along with our comments:

Standard	Significance of proposed change
<ul style="list-style-type: none"> Expansion in the physical dimensions of the project by 10% or more relative to the estimate previously reviewed, or a new exceedance of any review threshold 	No significant change in physical dimensions and no new review threshold exceeded. The project gross square footage and impervious area does not substantially change, and the maximum project height decreases (because no new stack will be built).
<ul style="list-style-type: none"> Increase in the generation of an impact by 25% or more than the level specified in any review threshold, or a new exceedance of a review threshold 	No such increase. Air emissions will meet the same or lower limits, water use & discharge will decrease.
<ul style="list-style-type: none"> Change in expected date for commencement of construction or schedule 	Schedule is approximately the same
<ul style="list-style-type: none"> Change of project site (not applicable) 	Same site
<ul style="list-style-type: none"> New application for a permit or new request for financial assistance or land transfer 	There is a new application for a federal PSD permit because the project previously qualified for a pollution control exemption that is no longer available.
<ul style="list-style-type: none"> For a project with net benefits to environmental quality and resources or public health, any change that prevents or materially delays realization of such benefits 	Expect equivalent benefits for dry versus wet scrubbing technology.

<ul style="list-style-type: none">• For a project involving a lapse of time, changes in the ambient environment or information concerning the ambient environment (not applicable)	Schedule is approximately the same.
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(d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts.

This continues to be a pollution control project. The project will substantially reduce sulfur dioxide emissions from the Unit 3 boiler.