Prepared by: K. Quinn-Jacobs
2019-02-21

ANALYSIS OF DOMINION ENERGY PROPOSAL (01/22/19)

Key points:

1. Two new compressors with oxidation catalysts will replace Units 2 & 3. Old compressors will be decommissioned once new units are tested and operational.
2. The horsepower of the proposed units (6130hp/unit) is comparable to the existing units (5800hp/unit).
3. Dominion has not expanded its customer base.
4. Other equipment upgrades to support compressor upgrades are also proposed.
5. Noise reduction is proposed: silencers for the new compressors and the existing blowdown pipe; underground piping to Units 5 & 6.
6. Dominion estimates project can be completed by 4th quarter of 2021.
7. The proposed equipment upgrades will likely result in Borger losing its Title V designation as a source of major pollution.
8. Dominion intends to sell Units 2 & 3 after decommissioning. The Town of Dryden Safety & Preparedness committee would like the town to request that Units 2 & 3 be dismantled and sold for scrap metal, rather than be used in other communities given their substandard technology and emissions profiles.
9. **NOTE**: An oxidation catalyst retrofit of Unit 4 is <u>not</u> in the Dominion proposal. The Town of Dryden Safety & Preparedness committee would like this to be included before permits are issued.

Comparison of emissions:

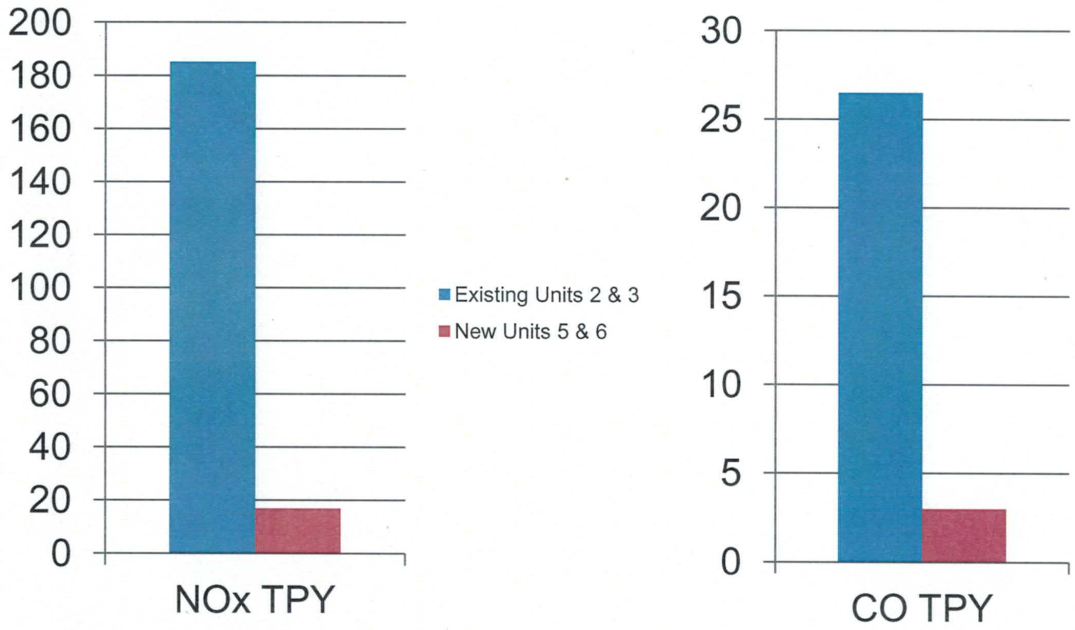
	Units 2 & 3 (existing)	**Units 5 & 6 (proposed)**	**Reduction tons/yr**	**% Change/Yr**
NOx (tons)	185.2	17	-168.2	-90.8%
CO (tons)	26.5	3	-23.5	-88.7%
Runtimes	ave 1h/day	24h x 365d		
Max Hours/Yr	365	8760*		

*Dominion stated they do not anticipate continuous usage of the new compressors.

Conclusion: Even with proposed units 5 & 6 running continuously (an unlikely occurrence) the NOx and CO reductions are highly significant.

Potential Borger Replacement Project

Emissions Comparison



- Potential emissions from existing Units 2 & 3 are from the 2018 Title V Renewal Application and include the associated hours restrictions currently in the permit.
- Potential emissions from the new Units assume 9ppm NOx and an oxidation catalyst

Dominion Energy

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