DUKE ENERGY.

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June 12, 2017

Mr. William Willets, Chief
North Carolina Department of Environment Quality
Division of Air Quality
Permitting Section
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Subject: **Mercury and Air Toxics Standard (MATS); 40 CFR 63, Subpart UUUUU**
Rescission Request to Use Halide Salts as a Mercury Control Strategy

Reference: **Roxboro Steam Electric Plant, Facility ID No. 7300029; Permit No. 01001T**
Mayo Electric Generating Plant, Facility ID No. 7300045; Permit No. 03478T
Belews Creek Steam Station, Facility ID No. 8500004; Permit No. 01983T
Cliffside Steam Station, Facility ID No. 8100028; Permit No. 04044T
Allen Steam Station, Facility ID No. 3600039; Permit No. 03757T
Marshall Steam Station, Facility ID No. 1800073; Permit No. 03676T

Dear Mr. Willets:

Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (Duke Energy) operate the generating stations referenced above which are major sources of hazardous air pollutants (HAP) as defined by the Clean Air Act. The electric generating units (EGUs) at each of these sites are classified as existing sources under the National Emission Standards for Hazardous Air Pollutants From Coal and Oil-Fired Electric Utility Steam Generating Units (Mercury and Air Toxics Standards, or "MATS") rule presented at 40 CFR 63, Subpart UUUUU.

The MATS rule was promulgated on February 16, 2012 (77 Fed. Reg. 9304), and became effective April 16, 2012. With the publication of the MATS rule, sources had 3 years from the effective date, or until April 16, 2015, to comply with the MATS requirements. Note that the Allen and Marshall facilities were granted a one-year extension to comply with the emission limitations and work practice standards.

The MATS rule limits emissions of metallic compounds using filterable particulate as a surrogate, acid gas emissions by using sulfur dioxide (SO_2) or hydrogen chloride (HCl) as surrogates, and finally mercury emissions are measured directly.

Duke Energy has implemented a number of measures at the facilities listed above to reduce emissions to levels that will continuously comply with the MATS emissions limits Some control measures will be used at all times (i.e., flue gas desulfurization units), while other measures are considered "trim" technologies and would be used intermittently to ensure compliance.

One of the trim technologies that was identified was the use of a halide salt to minimize emissions of mercury. Permit applications requesting authorization to use this material at all of the coal-fired sites in the Carolinas were submitted to the North Carolina Division of Air Quality (NCDAQ). Since the submittal of these applications, Duke Energy has gained additional operational knowledge and data regarding our mercury emissions. At this time, the company does not have any plans to pursue application of the halide salts as a mitigation strategy.

Therefore, this correspondence is respectfully requesting that the request to apply halide salt materials be removed from pending permit renewal for the Marshall facility. Additionally, the request to add halide salts as outlined in the following applications should also be rescinded:

- Belews Creek –Application 8500004.15D
- Cliffside – Application 8100028.15D
- Roxboro – Application 7300029.15A

Allen and Mayo are the only outstanding permits to be modified to remove the material. Under separate cover, a 502(b)(10) application in accordance with 15A NCAC 02Q .0523 will be submitted concurrently from the facility.

We appreciate your consideration of this request. If you have additional questions or concerns, please do not hesitate to contact Ms. Cynthia Winston at (919) 546-5538 or at Cynthia.Winston@duke-energy.com.

Sincerely,

Larry E. Hatcher

Larry E. Hatcher
Vice President, Environmental

CC: Ashley Featherstone, WNCRAQA