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Air Enforcement: Alabama Department of Environmental Management and Mobile County Steam Electric Generating Plant Enter into Consent Order

11/19/2020

The Alabama Department of Environmental Management (“ADEM”) and Alabama Power Company (“APC”) entered into a Consent Order (“CO”) addressing alleged violations of an air permit.

The CO provides that APC is the owner/operator of an electric steam generating plant (“Plant”) operating in Mobile County, Alabama.

The Plant is described as including a coal-fired power boiler operating under the authority of an air permit.

APC is stated to have performed a Hydrogen Chloride emissions test on Unit 4 in accordance with Method 26A of 40 C.F.R. 60, Appendix A. ADEM was provided a report on June 3rd summarizing the results of the test which are stated to have exceeded the applicable Hydrogen Chloride emission limit. The violations included an exceedance of 40 C.F.R. Part 63, Subpart UUU.

APC is stated to have indicated:

- A sudden and unanticipated introduction of moisture into the dry sorbent injection system immediately prior to and during the test resulted in accelerated and unusual plugging of the sorbent injection lances and interfered temporarily with the performance of the sorbent injection system
- APC identified and cleaned out unusual plugging the day following the test and following such maintenance the system operated properly
- The dry sorbent material injected for control of Hydrogen Chloride is highly susceptible to moisture and, therefore, Unit 4 employees dedicated air dryers to dehumidify purge air
- Maintenance and repairs were made to the dedicated dryer and returned it to service the afternoon prior to the test
- The process of isolating, repairing and then reconnecting the dryer introduced a shock of moisture into the system for a short period as large spaces/ducts that Page 6 of 11 had been bypassed while the dryer was out of service were reconnected

The CO assesses a civil penalty of \$35,000.

A copy of the CO can be found [here](#).

