



Emissions Reduction Warehousing Analysis

Positioning Your Plant for Growth

BURNS  **MCDONNELL**

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Agenda

- ▶ Perspective: EPC viewpoint on emission reductions
- ▶ Motivation: value of internal control evaluations
- ▶ Process: steps to evaluate/rank control costs
- ▶ Execution: typical control project cycle
- ▶ Examples: EPC projects, options, value
- ▶ Tips & Takeaways



Perspective: EPC Viewpoint on Emission Reductions

- ▶ Emission reduction solutions enable strategic EPC projects: expansions, revamps, grassroots
- ▶ ER demands create EPC opportunities
- ▶ ER demand is already increasing for HGB serious ozone nonattainment bump - be ready for of the pinch

Bottom line: EPC success in Houston area depends on understanding requirements + delivering internal control solutions



Motivation: Value of Proactive Internal Control Project Evaluations

Identify & rank control opportunities to achieve...

▶ Confidence:

- manage risk to future project feasibility, cost, schedule with identified ERs ready when needed – improve position for site selections

▶ Value:

- estimate project costs for comparison to market value
- market value could justify controls for revenue
- net out to avoid LAER costs and choose best control spend

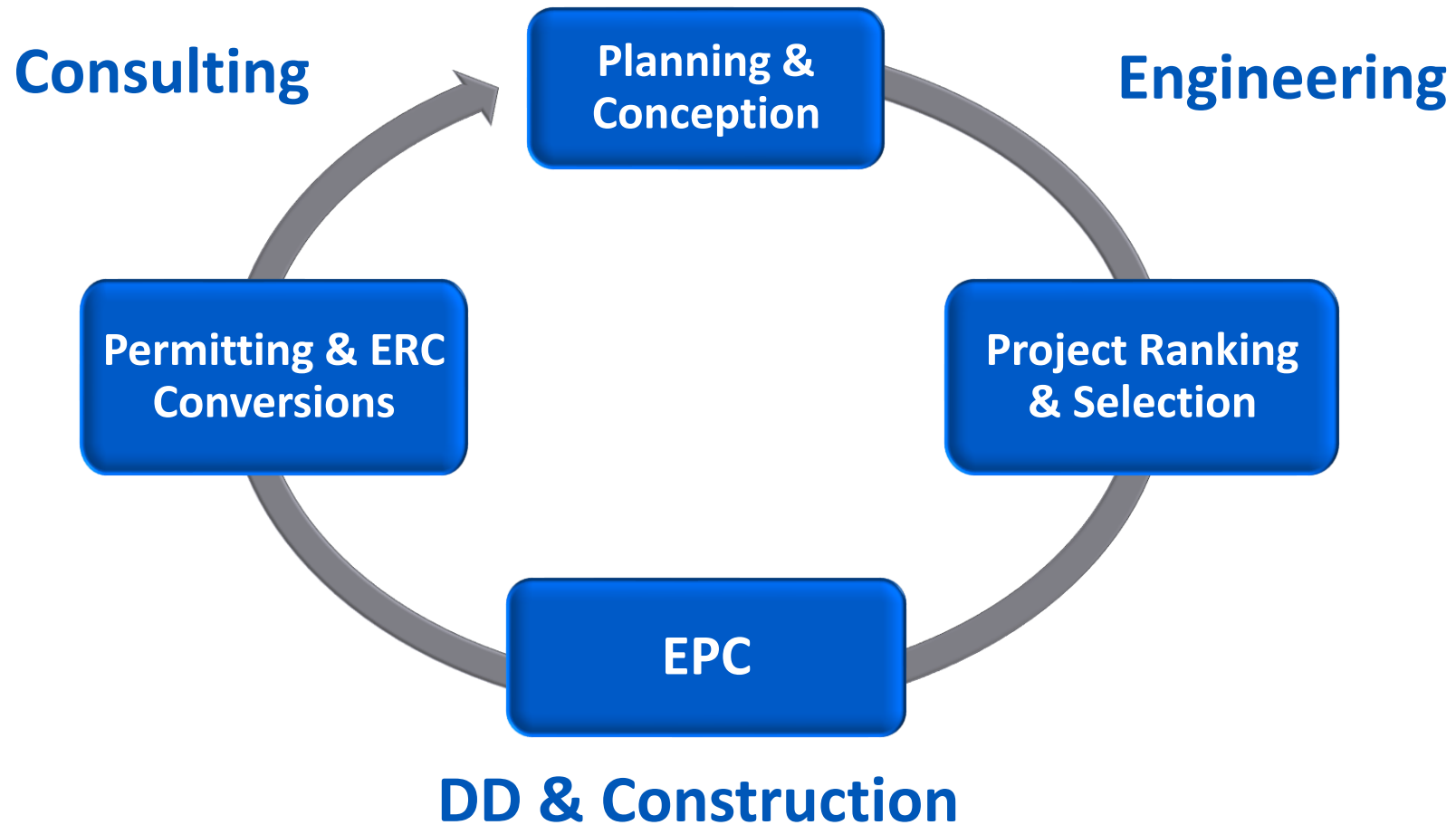
▶ Speed:

- net out to avoid nonattainment and PSD permit delays
- positioned to execute projects when needed

Process: Steps to Evaluate/Rank Control Costs

1. **Define** actual or potential pollutant/program needs
2. **Identify** sources with credible control options
3. **Validate** selected SIP baseline actual emissions
4. **Scope and estimate** control project CAPEX/OPEX
5. **Quantify** emission reduction and cost/ton
6. **Normalize** cost/ton for comparison
7. **Rank** control options along key decision-making axes

Execution: Typical Control Project Cycle and Resource Needs



Example: EPC Control Projects

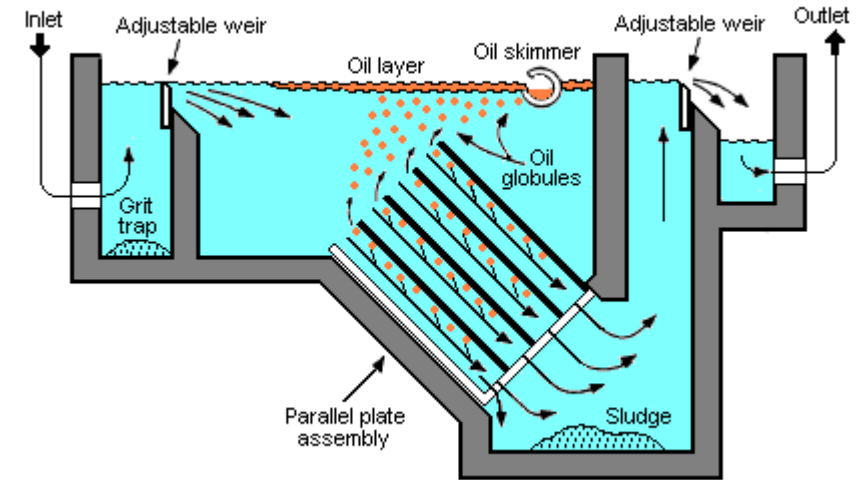
- ▶ **Storage tanks:** domed roof on EFR, IFR upgrades
- ▶ **Flares:** vapor recovery, reroute to oxidizer
- ▶ **Wastewater systems:** enclose, add controls
- ▶ **Fired units:** replace, retrofit, fuel treatment
- ▶ **Other sources:** add/replace control device
- ▶ **Process changes:** solvent/material substitution, heat recovery and integration



Example: Potential Lower Cost Options

Evaluate and optimize key utility systems:

- ▶ **Flare headers:** flow contribution evaluation, replace PSVs, reduce sweep gas & inert gas flows, analyzer sample loops
- ▶ **Steam distribution:** steam trap study, improve thermal efficiency and reduce boiler firing demand
- ▶ **Wastewater:** reduce inert gas flows, constant-level controls, conservation vents, reflective coatings on uninsulated surfaces, operating adjustments



Example: Value Captured by One Project

Houston area facility:

- ▶ **Problem:** strategic project needed large VOC emission reduction to permit construction
- ▶ **Market cost:** budgeted ~\$50M
- ▶ **Solution:** internal control options evaluated, new VOC control device installation opportunity identified
- ▶ **EPC cost:** preliminary engineering estimate <\$15M
- ▶ **Savings:** >\$35M

Tips and Takeaways

- ▶ **Appreciate strategic implications** of emissions credit and netting programs for projects: worthy of investment
- ▶ **Secure resources** needed for complex, innovative evaluations and decision-making tools
- ▶ **Define** the problem, potential problem set, or opportunity
- ▶ **Make internal control plan** by evaluating/ranking options
- ▶ **Integrate** control plan with long-term permit strategy and credit/allowance planning
- ▶ **Maintain** control plan with tools designed to respond... change is the only constant

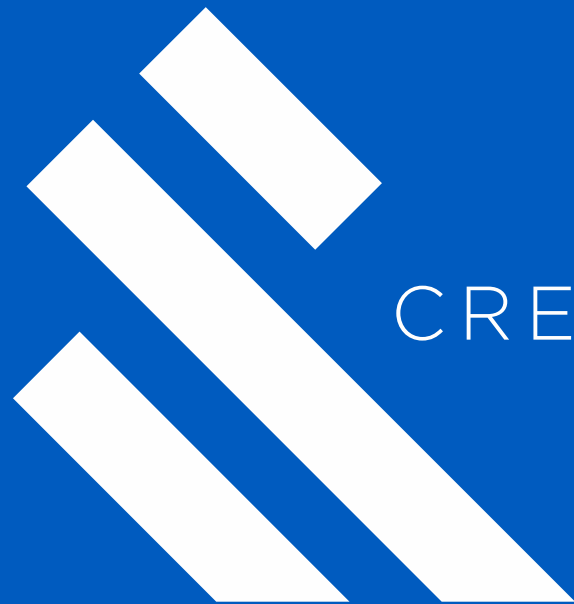
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