

Ameren Missouri Compliance Strategies

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Cross State Air Pollution Rule (CSAPR)

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Cross State Air Pollution Rule (CSAPR)

Compliance plans for SO₂

- Burn ultra-low sulfur coal starting in 2012
- Bank SO₂ credits
- Evaluate additional ultra low sulfur fuel purchases vs. emissions control equipment for compliance in 2018 and beyond

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Cross State Air Pollution Rule (CSAPR)

Compliance options for NOx

- Aggressive tuning of existing units
- Additional SOFA modifications at [REDACTED]
- NOx credit purchases and/or swap of SO2 for NOx credits
- Unit de-rates or reductions in generation

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Maximum Achievable Control Technology (MACT)

Compliance options for MACT

- Electrostatic precipitator (ESP) upgrades for PM control [REDACTED]
- Activated Carbon Injection (ACI) for Hg control [REDACTED]
- Fuel additive at Sioux for Hg control (\$1M)
- PM, HCL, and Hg Continuous Emission Monitors (CEM) on all plants by 1/1/15 [REDACTED]

Note: At this time it is anticipated that no HCl control equipment will be required.

Ameren Missouri Summary

- ▶ **316(a)** Compliance cost will be dependent on re-issued NPDES permits [REDACTED]
- ▶ **316(b)** requirements can be met in the near term with technology and biological studies [REDACTED]
- ▶ **CSAPR SO2** requirements will be met through 2017 by the purchase of ultra-low sulfur coal.
- ▶ **CSAPR NOx** credits will be bought or traded. However reduction requirements are still being evaluated and may require additional capital spending to install control equipment.
- ▶ **MACT** may require additional equipment installation by 1/1/2015 (potential for an extra year if approved by MDNR and EPA) [REDACTED]