

**LaSalle Environmental Audit  
Response to Request for Additional Information**

**Index #:** 007    **RAI #:** MA-07    **Category:** Meteorology, Air Quality & Noise

**Statement of Question:**

Table 3.3-2 of the ER provided a greenhouse gas (GHG) emission inventory for the year 2013.

- a. Provide annual GHG emission inventory of LSCS for the most recent 5 years.
- b. Does Exelon compile LSCS site-specific data for mobile GHG emission sources (e.g. employee vehicles, delivery vehicles)? If so, provide GHG emissions from mobile sources in the annual GHG emission inventory.
- c. As provided during the environmental audit, provide a description as to how GHG emissions were calculated for each source (direct stationary combustion, direct CO<sub>2</sub> fugitive, HFC/PFC refrigerants, purchased electricity, and ozone depleting refrigerants).
- d. Clarify if Exelon maintains a program to manage stationary refrigeration appliances at LSCS to recycle, recapture, or reduce emissions of ozone depleting substances and is in compliance with Section 608 of the CAA, under Title VI of the CAA.

**Response:**

- a. Table 1 contains GHG emissions summary data for LSCS from 2010 through 2014.

**Table 1  
LaSalle County Station GHG Emissions Summary (2010 through 2014)  
[GHG CO<sub>2</sub> Equivalents (metric tons)]**

	2010	2011	2012	2013	2014
<b>Direct - Scope 1</b>					
Direct Stationary Combustion	1,022.41	321.55	346.96	245.07	605.26
Direct CO <sub>2</sub> Fugitive	1,354.50	2,978.47	1,792.04	2,508	2,187.36
SF <sub>6</sub> Fugitive (started tracking at site level in 2014)	0.0	0.0	0.0	0.0	2,378.64
HFC / PFC Refrigerants	0.00	0.00	0.00	2.95	0.00
<b>Indirect - Scope 2</b>					
Purchased Electricity	34,260.47	33,493.08	36,066.36	30,519.93	32,977.97
<b>Supplemental</b>					
Ozone Depleting Refrigerants	1,103.86	629.36	360.61	952.14	474.23

- b. Exelon Corporation does not compile or report GHG data for mobile sources, except those under corporate control (fleet vehicles). Within Exelon Generation, GHG emissions from fleet vehicles are tracked through fleet fuel usage. The data are tracked for the Exelon Generation fleet rather than individual facilities. Therefore, no information on emissions from vehicles specific to LaSalle County Station is readily available.
- c. Direct Stationary Combustion emissions reported in Table 1, above, include emissions from 5 large diesel engines (600 HP or more) as well as small diesel engines (less than 600 HP). Fuel use data and EPA emission factors (AP 42, *Compilation of Air Pollutant*

*Emission Factors*, Chapter 3) are employed for calculating emissions from these engines. Please note that Exelon Nuclear began gathering fuel use data for small engines in 2012. Small engine fuel consumption for 2012 through 2014 was approximately 30% of the large engine fuel consumption. On this basis the small engine fuel consumption was calculated as 33% of the large diesel fuel consumption for 2010 and 2011.

Direct CO<sub>2</sub> Fugitive emissions reported in Table 1, above, are primarily from the CO<sub>2</sub> injection system used to adjust pH in the cooling pond and the CO<sub>2</sub> fire protection system. This is tracked solely by the amount of CO<sub>2</sub> purchased. When purchased, the amount purchased is assumed to be released.

SF<sub>6</sub> is used to locate leaks in the condensers. The direct SF<sub>6</sub> Fugitive CO<sub>2</sub> equivalent emissions reported in Table 1, above, were calculated using the applicable EPA conversion factor and assuming that all purchased SF<sub>6</sub> was released at the time of purchase.

The direct HFC / PFC Refrigerants and supplemental Ozone Depleting Refrigerants CO<sub>2</sub> equivalent emissions reported in Table 1, above, were calculated using the applicable EPA conversion factors and assuming that all purchased refrigerants were released at the time of purchase.

The indirect Purchased Electricity CO<sub>2</sub> emissions reported in Table 1, above, were calculated using EPA eGrid emission factors (<http://epa.gov/cleanenergy/energy-resources/egrid/index.html>) and monthly billings from the offsite electricity supplier for LSCS.

- d. Exelon Nuclear has corporate procedures that provide direction to the nuclear stations, including LSCS, regarding compliance with Section 608 of the Clean Air Act (CAA) and 40 CFR Part 80, Subpart F. Sites perform annual Self-Assessments to demonstrate conformance. LaSalle most recently completed a Self-Assessment for this program in September 2014.

**List of Attachments:**

None.