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REVIEW COMMISSION

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ENVIRONMENTAL QUALITY BOARD
RE: COMMENTS CONCERNING PADEP'S MERCURY EMISSION REDUCTION
REQUIREMENTS FOR ELECTRIC GENERATING UNITS [EGU'S] (#7-405)
PO Box 8477
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COMMENTS CONCERNING PADEP'S MERCURY EMISSION REDUCTION
REQUIREMENTS FOR ELECTRIC GENERATING UNITS [EGU'S] (#7-405)

INTRODUCTION:

THE PENNSYLVANIA CHAPTER OF SIERRA CLUB SUPPORTS A STATE SPECIFIC PENNSYLVANIA MERCURY REDUCTION RULE, WITH SOURCE AND SITE SPECIFIC REDUCTIONS FROM TECHNOLOGY CONTROLS THAT WILL BE REQUIRED, AND NO TRADING WILL BE PERMITTED TO TAKE PLACE. THEREFORE THE PENNSYLVANIA CHAPTER OF SIERRA CLUB SUPPORTS THE PADEP PROPOSED RULE AS PRESENTED TO EQB.

THE SIERRA CLUB, PENNSYLVANIA CHAPTER PROPOSES THAT "COMPLETE MERCURY CONTROL" BE DEFINED AS SELECTIVE CATALYTIC REDUCTION [SCR], PLUS FABRIC FILTER, PLUS WET SCRUBBERS [WFGD], WITH THE ADDITION OF ACI – THE ACTIVATED CARBON INJECTION CONTROL TECHNOLOGY, WHERE ADDITIONAL CONTROL IS NEEDED TO MEET THE MERCURY CONTROL GOALS AS PROPOSED BY PADEP.

THE INTENT OF CONGRESS WAS ALWAYS TO REGULATE DANGEROUS TOXIC POLLUTANTS UNDER SECTION §112 OF THE CLEAN AIR ACT. THE BUSH ADMINISTRATION'S 'CAMR' – THE SO-CALLED CLEAN AIR MERCURY RULE – PROPOSES TO ILLEGALLY REGULATE MERCURY UNDER THE CAA, §111 (D) THEREBY AVOIDING THE VERY TECHNOLOGY METHODS WHICH WILL CERTAINLY REDUCE MERCURY POLLUTION AND PROTECT OUR CHILDREN'S HEALTH. THE PADEP HAS DONE THE RIGHT THING BY JOINING OTHER STATES IN CHALLENGING IN FEDERAL COURT, THE CAMR.

PENNSYLVANIA & TWENTY OTHER STATES HAVE REJECTED THE FEDERAL GOVERNMENT'S CLEAN AIR MERCURY RULE & ITS REGULATION – INCLUDING CONNECTICUT, MASSACHUSETTS, MARYLAND, NEW JERSEY, GEORGIA, ILLINOIS, MINNESOTA AND NEW HAMPSHIRE – AND ARE CONTROLLING – OR ARE ABOUT TO CONTROL MERCURY BETTER THAN THE FEDERAL GOVERNMENT.

PADEP HAS BENT OVER BACKWARDS TO MINIMIZE THE COSTS TO APPLICABLE EGU SOURCES FOR MERCURY CONTROL. BALANCE THOSE MINIMAL COSTS OF

\$2.00/MW AGAINST THE COSTS OF HUMAN HEALTH CARE. DR JIM LYNCH'S MERCURY MONITORING NETWORK HAS SHOWED US THAT MERCURY IMPACTS OCCUR ACROSS ALL OF PENNSYLVANIA, AND WE THEREFORE MUST CONTROL MERCURY ACROSS ALL OF PENNSYLVANIA IN ORDER TO REDUCE HEALTH CARE COSTS TO ADULTS CONSUMING CONTAMINATED FISH ON A REGULAR BASIS, AND MORE IMPORTANTLY, TO REDUCE THE LIFELONG HEALTH CARE COSTS TO AFFECTED CHILDREN WITH NEUROLOGICAL DAMAGE AND LEARNING DISABILITIES.

BACKGROUND:

THE CONTRIBUTION OF PENNSYLVANIA POWER PLANTS TO THE MERCURY PROBLEM IN OUR STATE IS ABOUT 77% OF THE TOTAL MERCURY EMITTED INTO OUR ATMOSPHERE, OR ABOUT 3.85 TONS PER YEAR OUT OF TOTAL OF 5 TPY. THE PADEP FINDS THAT EGU'S THAT BURN 100% BITUMINOUS COAL AND CONTROL SO₂ EMISSIONS WITH A WET SCRUBBER [WFGD; WITH FGD = FLUE GAS DESULFURIZATION] AND CONTROL NO_x EMISSIONS WITH SCR [SELECTIVE CATALYTIC REDUCTION] CAN " ... EXPECT TO CAPTURE APPROXIMATELY 90% OF MERCURY ..." PADEP CALLS THIS "COMPLETE CONTROL".

IN PA, 85% OF COAL BURNED IS BITUMINOUS, WITH 15% WASTE COAL. PA COAL HAS HIGHER LEVELS OF MERCURY AND CHLORINE, ALLOWING MORE MERCURY TO BE OXIDIZED AND TO DROP OUT OF THE ATMOSPHERE CLOSER TO THE SOURCE, CAUSING HOTSPOTS. HOTSPOTS ARE UNACCEPTABLE FOR A TOXIC AIR POLLUTANT LIKE MERCURY.

THE PADEP PROPOSED MERCURY RULE IS DESIGNED TO TAKE ADVANTAGE OF THE CO-BENEFIT OF NO_x REDUCTIONS UNDER CAIR, THE FEDERAL CLEAN AIR INTERSTATE RULE. THAT SAID, THEN MERCURY REDUCTIONS IN PENNSYLVANIA ARE DEPENDENT UPON ACHIEVING TRUE EMISSIONS REDUCTIONS THROUGH THE CONSTRUCTION & PLACEMENT OF SOURCE SPECIFIC TECHNOLOGY UNDER THE FEDERAL CLEAN AIR INTERSTATE RULE — THE CAIR RULE, AND NOT TRADING FOR EMISSION CREDITS.

TRADING PROGRAMS FOR OZONE SMOG REDUCTION ARE UNSUCCESSFUL HERE IN PENNSYLVANIA, BECAUSE THEY HAVE FAILED TO SUFFICIENTLY REDUCE CRITERIA AIR POLLUTANTS WITHIN PENNSYLVANIA'S LARGE POPULATION CENTERS — LARGE CITIES SUCH AS PHILADELPHIA & PITTSBURGH; BECAUSE TRADING HAS ALLOWED SOURCES TO AVOID TECHNOLOGY CONTROLS; BECAUSE TRADING PROGRAMS HAVE ALLOWED A TRADING DISTANCE THAT WAS TOO GREAT AND BECAUSE WRONG DIRECTION TRADING HAS BEEN PERMITTED: I.E., A SOURCE DOWNWIND HAS BEEN PERMITTED TO SELL ALLOWANCES OR EMISSIONS REDUCTION CREDITS TO A SOURCE UPWIND, THEREBY ALLOWING BOTH THE UPWIND AND DOWNWIND POPULATION CENTERS TO CONTINUE TO BE POLLUTED.

PADEP IN ITS PREAMBLE TO THIS PROPOSED REGULATION IDENTIFIES THAT FOR THOSE EGU'S THAT ARE BURNING " ... 100% BITUMINOUS COAL AND THAT CONTROL SO₂ EMISSIONS WITH A WET SCRUBBER [WFGD] [FGD = FLUE GAS DESULFURIZATION] AND CONTROL NO_x EMISSIONS WITH SCR [SELECTIVE CATALYTIC REDUCTION], THAT THEY CAN " ... EXPECT TO CAPTURE APPROXIMATELY 90% OF MERCURY EMISSIONS." YET, A REPORT PREPARED IN MARCH 2005 - FOR THE CENTER FOR ENERGY & ECONOMIC DEVELOPMENT, INC,

AND PREPARED BY ENERGY VENTURES ANALYSIS INC AND THE FIRM OF MARCHETTI, CICHANOWICZ AND HEIN – AND ENTITLED, “*THE IMPACT OF MERCURY REGULATIONS ON PENNSYLVANIA COAL-FIRED POWER PLANTS*” INCLUDED A TABLE B-1: BEST ESTIMATES OF CO-BENEFITS AND RESIDUAL MERCURY FOR POST COMBUSTION CONTROL TECHNOLOGIES. THIS TABLE AND ITS INFORMATION WERE PRESENTED TO EPA FROM EPRI IN JANUARY 2005. THIS TABLE SPECIFICALLY SAYS THAT 90% REDUCTION OF MERCURY FROM EXISTING SOURCES WILL BE ACHIEVED FROM BITUMINOUS COAL USING SCR, A FABRIC PARTICULATE FILTER AND WFGD.

PADEP HAS PROPOSED MERCURY CONTROLS AND ALTERED ITS PROPOSAL SINCE THE ORIGINAL 2004 MERCURY PETITION WAS ACCEPTED BY EQB. THESE CHANGES HAVE LED TO AN ALTERED PROPOSAL COMPARED TO THE ORIGINAL PETITION.

- *PADEP SHOULD PROVIDE CURRENT EMISSIONS REDUCTIONS ESTIMATES ASSOCIATED WITH CURRENT REGULATORY LANGUAGE; AND*
- *PADEP SHOULD PROVIDE EMISSIONS REDUCTIONS EXPECTED FROM USING A STATEWIDE FACILITY AVERAGING MECHANISM FOR MERCURY EMISSIONS.*

BECAUSE THIS PROPOSAL HAS CHANGED, PADEP SHOULD EXPECT THAT ITS INITIAL EMISSION REDUCTION ESTIMATES WILL YIELD LESS BENEFIT THAN BEFORE. THAT CIRCUMSTANCE WOULD LEAD US TO EXPECT TO NEED ADDITIONAL REDUCTIONS AND ADDITIONAL TECHNOLOGY TO ACCOMPLISH THOSE REDUCTIONS.

PENNSYLVANIA HAS YET TO SEE A POWER PLANT INDUSTRY APPLICATION FOR COMPLIANCE WITH THE FEDERAL CAIR RULE THAT INCLUDES NEW SCR [AS OF JULY 13TH]. PROPOSALS FOR WET SCRUBBERS ONLY FOR SO₂ CONTROL ACCOMPANIES INDUSTRY PLANS TO DE-STAGE NOX LNB – LOW NOX BURNER - TECHNOLOGIES. IF THE INDUSTRY APPLICABLE SOURCES ARE NOT PLANNING TO APPLY AND CONSTRUCT SCR IN ORDER TO RESPOND TO CAIR REQUIREMENTS, THEN THEY SHOULD BE REQUIRED TO PLACE SCR ON APPLICABLE UNITS TO MEET MERCURY REDUCTION REQUIREMENTS HERE IN PENNSYLVANIA.

AQTAC SUGGESTED COMMENTS ON FOLLOWING ISSUES: THE AIR QUALITY TECHNICAL ADVISORY COMMITTEE HAS REQUESTED PUBLIC COMMENT ON AN ARRAY OF ISSUES, THOUGH NOT ALL MEMBERS AGREED ON THE QUESTIONS TO BE ASKED.

1. **EMISSION LIMIT SUPPLEMENT POOL UNDER CHAPTER §123.208:** THERE SHOULD NOT BE ANY SUPPLEMENT POOL ESTABLISHED AS PADEP PROPOSES IN §123.208 (A) AND (B), SINCE THIS WOULD ERODE THE ABILITY OF AN ALLOWANCE PROGRAM WITHOUT TRADING TO REDUCE MERCURY AS EXPEDITIOUSLY AS PRACTICABLE. PADEP SHOULD AWARD UNUSED ALLOWANCES TO THE STATE AND RETIRE THEM.

2. **NEW SOURCE SET ASIDE UNDER CHAPTER § 123.207 [ANNUAL EMISSION LIMIT FOR EGU's]:** THE MOST CURRENT NUMBER OF KNOWN MERCURY EMISSIONS IN PENNSYLVANIA IS 3.392 TPY MERCURY IN 2003. THAT IS 6784 POUNDS MERCURY IN 2003 FOR 36 POWER PLANTS. PADEP PROPOSES THAT 5% OF THE 3560 POUNDS OF MERCURY ALLOWANCES FOR PHASE 1 STATEWIDE MERCURY REDUCTION PROGRAM BE SET ASIDE FOR USE BY NEW UNITS TO COME ON LINE DURING THE PHASE 1 CONTROL PERIOD AND THAT 3% OF THE 1404 POUNDS OF MERCURY ALLOWANCES FOR PHASE 2 BE SET ASIDE FOR USE BY NEW UNITS TO COME ON LINE DURING THE PHASE 2 CONTROL PERIOD. PENNSYLVANIA SHOULD BE REDUCING MERCURY EMISSIONS BY 90% BY 2015. THESE SET ASIDE ALLOWANCES COULD DRASTICALLY AFFECT PENNSYLVANIA'S ABILITY TO CONTROL MERCURY IN A TIMELY MANNER – AS EXPEDITIOUSLY AS PRACTICABLE – TO PROTECT HUMAN HEALTH. 'COMPLIANCE PRESUMPTION' IN THIS SECTION IS A DANGEROUS METHOD UNLESS IT IS COUPLED WITH EXPLICIT INSPECTIONS AND ENFORCEMENT. E.G., § 123.207(b)(2) REMOVES REQUIREMENTS FOR DEMONSTRATION OF A SPECIFIC RESIDENCE TIME IN THE SCR. BUT WOULDN'T IT BE PRUDENT TO HAVE A MECHANISM FOR DEMONSTRATION THAT THE SCR IS MAINTAINING THAT DESIRED RESIDENCE TIME?
3. **COAL PRE-CLEANING AS A PORTION OF PERCENTAGE REDUCTION IN MEETING MINIMUM MERCURY CONTROL PERCENTAGE UNDER § 123.205:** UNDER THIS SECTION § 123.205, PADEP SHOULD INCLUDE REGULATORY LANGUAGE THAT REQUIRES THAT THE AGENCY REVISIT THE EMISSIONS RATE SPECIFIED FOR 100% BITUMINOUS COAL USED IN CFB – CIRCULATING FLUIDIZED BED – BOILERS, AS SOON AS REASONABLE DATA IS COLLECTED ON THESE BOILERS. MORE TO THE POINT OF THE QUESTION, UNDER § 123.205(A)(3)(ii), THE MINIMUM 95% CONTROL OF TOTAL MERCURY SHOULD BE MEASURED FROM THE MERCURY CONTENT IN THE COAL AS FIRED; I.E., DAY TO DAY, IN ORDER TO PRESERVE THE INTEGRITY OF THIS RULE, ACCOMPLISH REAL MERCURY REDUCTION, AND DEAL WITH WIDELY VARYING MERCURY CONTENT IN COALS USED OVER AN EXTENDED PERIOD OF TIME. WE EXPECT CONTINUOUS BUYING OF COAL AND THEREFORE WIDELY VARYING MERCURY CONTENT.
4. **SHOULD PHASE 1 & 2 BE COMPRESSED TO ENCOURAGE EARLY COMPLIANCE:** MERCURY WAS MEANT TO BE CONTROLLED WITH CERTAINTY THROUGH THE USE OF TECHNOLOGY. THE TOXICITY OF MERCURY URGES THAT IT BE REDUCED "AS EXPEDITIOUSLY AS PRACTICABLE". ALL AFFECTED UNITS SHOULD BE APPLYING THE COMPLETE CONTROL TECHNOLOGIES THAT WILL ALLOW ITS' SOURCES TO ACHIEVE THE MERCURY CONTROL AS QUICKLY AS IS POSSIBLE. ANY UNIT WITH SCR, FABRIC FILTER, WFGD, AND ACI WILL OBVIOUSLY BE ABLE TO CONTROL BEFORE THE PHASE 2 DEADLINE.
5. **SHOULD THERE BE LONGER START-UP AND BREAK-IN TEST PERIODS, COST-SHARING BY OWNER-OPERATORS AND TECHNOLOGY VENDORS, EXTENDED PERMIT LIFE FOR NEW, IMPROVED AND MORE RELIABLE TECHNOLOGY IN ORDER TO ENCOURAGE DEVELOPMENT OF NEWER AND MORE RELIABLE**

TECHNOLOGY ON VOLUNTARY BASIS; NO. EXTENDED PERMIT LIFE WOULD MOST CERTAINLY NOT ACHIEVE THAT DESIRED ENDPOINT. IT WOULD NOT BE TECHNOLOGY FORCING. LONGER STARTUP AND BREAK-IN TEST PERIODS WILL SIMPLY ALLOW SOURCES AND FACILITIES TO AVOID THE NEED FOR COMPLIANCE. THESE ARE OFF THE SHELF TECHNOLOGIES; KNOWN PROCESSES. A KNOWN EXISTING TIMETABLE FOR COMPLIANCE HAS BEEN SHOWN TIME AND AGAIN TO FOSTER 'TECHNOLOGY FORCING' BEHAVIOR, VOLUNTARILY.

6. SHOULD DAILY SAMPLING OF COAL COMBUSTED UNDER §123.214 [COAL SAMPLE ANALYSES] BE EXTENDED TO INCLUDE SAMPLING OF COAL AS RECEIVED; SECTION §123.214(A)(1) PROVIDES FOR DAILY SAMPLING THAT DOES NOT PRECLUDE "AS RECEIVED".

7. HOW SHOULD PADEP ENCOURAGE OVER COMPLIANCE AND COST SHARING BETWEEN SOURCES; NO. IS THIS SIMPLY ANOTHER WAY OF SAYING THAT FACILITIES AND SOURCES WANT TO APPLY A BUBBLE CONCEPT - AND AN EXTENDED ONE AT THAT? MERCURY'S DANGER TO OUR CHILDREN DESERVES A SITE BY SITE AND SOURCE BY SOURCE SPECIFIC POLLUTION REDUCTION PROGRAM. IT IS NEITHER APPROPRIATE NOR DESIRABLE TO ALLOW EITHER MULTIPLE SOURCES AT MULTIPLE LOCATIONS UNDER THE SAME OWNER/OPERATORS, OR FACILITIES AND SOURCES WITH DIFFERENT OWNER/OPERATORS AT DIFFERENT LOCATIONS TO COMBINE POLLUTION REDUCTION EFFORTS. THERE SHOULD NEVER BE AVERAGING OF MERCURY POLLUTION REDUCTION OUTSIDE OF A SINGLE FACILITY AT A SINGLE LOCATION.

8. SHOULD PADEP CONSIDER THE RESULTS OF THE STEUBENVILLE OH STUDY ON REGULATORY REQUIREMENTS. YES. THE STEUBENVILLE OH IO HEALTH AND EMISSIONS STUDIES HAVE NOW PROVIDED UP TO DATE INFORMATION ON THE EXTENT OF THE MERCURY DEPOSITION PROBLEM AND THE EXISTENCE OF HOT SPOTS AND THEIR LOCATIONS. FURTHERMORE, THE U.S. EPA INSPECTOR GENERAL QUESTIONED EPA'S CLAIM THAT THERE WILL NOT BE SIGNIFICANT MERCURY HOT SPOTS NATIONALLY IN A MAY 15, 2006 REPORT. THE IG CITED A JUNE 2005 STUDY BY *ATMOSPHERIC ENVIRONMENT* SHOWING THAT THE COMPUTER MODEL USED BY EPA TO DETERMINE THE ULTIMATE TRANSPORT & DEPOSITION OF MERCURY FROM LOCAL SOURCES HAD SIGNIFICANT UNCERTAINTIES AND THAT EPA MUST DEVELOP MONITORING PLANS & REFINE THE MODEL TO ESTIMATE MERCURY DEPOSITION. THE IG ALSO CITED THE EPA FUNDED STUDY RELEASED IN FEBRUARY 2006 FROM STEUBENVILLE OHIO THAT USED RAIN SAMPLING AND METEOROLOGICAL DATA TO TRACK MERCURY EMISSIONS FROM POWER PLANT SMOKESTACKS DIRECTLY TO EMISSION MONITORS. ADDITIONALLY, IN APRIL, MASSACHUSETTS FOUND THAT THERE WAS A 32% AVERAGE DECREASE IN MERCURY FOUND IN YELLOW PERCH FISH FROM 9 LAKES IN NE MASSACHUSETTS WHERE INCINERATORS HAD TO COMPLY WITH TOUGH MERCURY EMISSIONS REDUCTIONS FOR THE LAST 7 YEARS. THE STATE OF FLORIDA EVERGLADES STUDY SHOWED A 60% - 70% DROP IN MERCURY LEVELS IN FISH & WADING BIRDS AFTER LOCAL MERCURY

EMISSIONS WERE REDUCED. THE EPA OFFICE OF WATER IN AN PREVIOUS STUDY FOUND THAT WITHIN A STATE, THAT IT WAS LOCAL SOURCES OF MERCURY THAT CONTRIBUTED FROM 50% TO 80% OF THE MERCURY DEPOSITED.

JOBS:

- THE U.S. DEPARTMENT OF LABOR [DOL] FINDS THAT ENVIRONMENTAL REGULATION OF U.S. POWER PLANTS WAS NOT EVEN MENTIONED AS A CAUSE OR FACTOR IN COAL JOB LOSSES IN THE U.S. THE DOL REPORTED THAT MINING JOBS DECLINED BECAUSE "NEW TECHNOLOGY AND MORE SOPHISTICATED MINING TECHNIQUES INCREASED PRODUCTIVITY, ALLOWING GROWTH IN OUTPUT WHILE EMPLOYING FEWER WORKERS."¹
- NUMEROUS OTHER STUDIES SHOW THAT THE QUALITY OF LIFE IS BETTER WITHOUT THE AFFECTS OF AIR POLLUTION, PROMPTING THE ECONOMY OF THE STATE TO BE BETTER ALSO.

HEALTH ISSUES: I AM ONE OF THE LUCKY ONES; MY MERCURY HAIR TEST FOUND 0.28 MICROGRAMS OF MERCURY/GRAM OF HAIR. I DON'T HAVE TO WORRY, BUT I DID NEED TO GIVE UP EATING TUNA & SWORDFISH. BUT MANY PENNSYLVANIANS WERE LESS LUCKY. PENNSYLVANIANS KNOW THAT MOST MERCURY COMES FROM POWER PLANTS & THAT WE HAVE A LARGE NUMBER OF DIRTY POWER PLANTS IN OUR STATE. THE NATIONAL MERCURY HAIR TEST STUDY EARLIER THIS YEAR FOUND THAT PENNSYLVANIA HAD THE SECOND HIGHEST VOLUNTARY PARTICIPATION IN HAIR TESTING. ON AVERAGE, MOST PENNSYLVANIANS TESTED HAD A RESULT OF 0.5 MICROGRAM PER GRAM HAIR, ALMOST TWICE MY OWN LEVEL. THE HIGHEST TEST WAS 10.72 MICROGRAM PER GRAM [$\mu\text{G}/\text{G}$] HAIR. THIS LEVEL INDICATES AN ELEVATED RISK TO WOMEN WHO ARE PREGNANT, PLANNING TO BECOME PREGNANT OR NURSING A BABY. THE 10.72 TEST IS JUST BELOW EPA'S BENCHMARK OF ELEVEN $\mu\text{G}/\text{G}$ HAIR FOR A MERCURY DOSE THAT CARRIES A NEAR CERTAINTY THAT 10 % OF BIRTHS WILL SHOW NEUROLOGICAL DEFECTS AT THIS DOSAGE. TO ESTIMATE THE RISK TO INFANTS, EPA HAS USED MULTIPLE EPIDEMIOLOGICAL STUDIES AT HAIR LEVELS AS LOW AS 4 - 5 $\mu\text{G}/\text{G}$ AND HAVE SHOWN THAT THESE LEVELS CAN LEAD TO ADVERSE AFFECTS IN THE NEWBORN.

COSTS: THE COSTS OF THIS PROPOSAL ARE APPROXIMATELY \$9 MILLION FOR 14 UNITS AND 6 FACILITIES. THAT IS \$2.00 PER MEGAWATT [MW]. SINCE COMPLIANCE WITH CAIR IS ALREADY REQUIRED THEN THAT SECONDARY BENEFIT OF MERCURY REDUCTION USING CAIR TECHNOLOGY COSTS ZERO DOLLARS. APPLICATIONS OF ACTIVATED CARBON INJECTION OR BROMATED ACI ARE PROJECTED BY PADEP [AQ/TAC, MARCH 30, 2006] TO COST BETWEEN \$100,000 AND \$1 MILLION DEPENDING ON SORBANT USED. THE APPLICATION OF MERCURY CONTROLS IS VERY COST EFFECTIVE.

¹ U.S. Department of Labor, Bureau of Labor Statistics, *Mining and Quarrying* website. See *Nature of Industry*: <http://www.bls.gov/oco/cg/cgs004.htm#nature> and *Outlook*: <http://www.bls.gov/oco/cg/cgs004.htm#outlook>

TECHNOLOGY:

THE SIERRA CLUB, PENNSYLVANIA CHAPTER PROPOSES THAT "COMPLETE MERCURY CONTROL" BE DEFINED AS SELECTIVE CATALYTIC REDUCTION [SCR], PLUS FABRIC FILTER, PLUS WET SCRUBBERS [WFGD], WITH THE ADDITION OF ACI – THE ACTIVATED CARBON INJECTION CONTROL TECHNOLOGY, WHERE ADDITIONAL CONTROL IS NEEDED TO MEET THE MERCURY CONTROL GOALS AS PROPOSED BY PADEP.

POLLING DATA: A PENNSYLVANIA POLL RELEASED IN JUNE 2006 FOUND THAT:

- FOUR OUT OF FIVE PENNSYLVANIANS SUPPORT THE STATE'S PROPOSAL TO REDUCE MERCURY EMISSIONS QUICKLY, WITH NO POLLUTION ALLOWANCES UP FOR SALE OR TRADE;
- PENNSYLVANIANS STRONGLY BELIEVE THAT MERCURY POLLUTION IS DANGEROUS TO OUR INFANTS;
- A MAJORITY OF PENNSYLVANIANS KNOW THAT MOST MERCURY POLLUTION IN OUR STATE COMES FROM POWER PLANTS;
- NEARLY 70% OF PENNSYLVANIANS KNOW THAT OUR LIMIT ON EATING FISH CAUGHT IN PENNSYLVANIA IS DUE TO EATING MERCURY CONTAMINATED FISH;
- PENNSYLVANIANS ARE WILLING TO PAY COST OF CLEAN-UP; THE AVERAGE ELECTRIC BILL IN PENNSYLVANIA WOULD INCREASE BY \$1.08 PER MONTH.

THE POLLING INFORMATION PROVIDED ABOVE IS JUST ONE INDICATION OF THE DEPTH OF THE PUBLIC'S DESIRE TO BE RID OF THE DANGERS THAT THIS NEUROTOXIN POSES. WE SINCERELY URGE ALL MEMBERS OF THE ENVIRONMENTAL QUALITY BOARD TO PUT THE HEALTH AND WELFARE OF OUR PEOPLE, OUR FAMILIES AND OUR CHILDREN BEFORE ALL OTHER CONCERNS.

THANK YOU FOR THE OPPORTUNITY TO COMMENT.

NANCY F. PARKS
CITIZEN OF AARONSBURG, HAINES TOWNSHIP, CENTRE COUNTY

CHAIR, CLEAN AIR COMMITTEE
SIERRA CLUB, PENNSYLVANIA CHAPTER

NANCY F. PARKS, AUGUST 11, 2006
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SUMMARY
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- INDUSTRY APPLICABLE SOURCES SHOULD APPLY SCR TO CAIR REQUIREMENTS, OR PLACE SCR ON APPLICABLE UNITS TO MEET MERCURY REDUCTION REQUIREMENTS;
- PADEP SHOULD PROVIDE EMISSIONS REDUCTIONS EXPECTED FROM USING A STATEWIDE FACILITY AVERAGING MECHANISM FOR MERCURY EMISSIONS;
- EMISSION LIMIT SUPPLEMENT POOL UNDER CHAPTER §123.208: THERE SHOULD NOT BE ANY SUPPLEMENT POOL ESTABLISHED AS PADEP PROPOSES IN §123.208 (A) AND (B), SINCE THIS WOULD ERODE THE ABILITY OF AN ALLOWANCE PROGRAM WITHOUT TRADING TO REDUCE MERCURY AS EXPEDITIOUSLY AS PRACTICABLE;
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