

From: John Austin [mailto:austin4102000@yahoo.com]
Sent: Tuesday, March 21, 2006 3:46 PM
To: Amirikian Ronald A. (DNREC)
Subject: Re: Answers to Questions

Thank you for the depth of your response.

After a detailed review of the CAMR, I assembled the necessary heat input data and performed the allocation calculation.

I think the exercise of presenting the federal baseline requirements should be presented by DNREC for the impact of the CAMR and CAIR on a unit by unit basis.

While on average mercury emissions will be reduced from 366.3 pounds (2004) to 56 pounds (2018) or 84.7%, because allocations are in portion to average of 3yr heat inputs under the CAMR, the actual reductions needed will be higher at EdgeMoor and lower at Indian River. Under the CAIR actual unit reductions will also be higher and lower than the average national impacts. If my analysis is correct, I believe the impacted facilities may not have correctly judged the unit reductions needed for federal baseline compliance in SO₂/NO_x. All need to see where their positions are relative to the baseline federal requirements.

For Pemcor's 311MW unit, its 2004 heat input was 2940835 MMBtu and TRI mercury 17 pounds. Thus, an emission rate of 5.78E-6 lb/MMBtu. A rate actually higher than Indian River (5.39E-6 lb/MMBtu). I am aware the neither Wabash or Polk IGCC units have operated with Hg controls. Elm Road did have a permit limit of 5.6E-6 lb/MWh while it operated. EPA simply applied a 90% capture rate in calculation of their performance standards. To keep the regulations consistent, this unit and any new IGCC units would need to have mercury control requirements set in the Multi-Pollutant Reg. While petroleum coke/heavy oil units are not subject of the CAMR, Delaware is no limited as to scope.

I believe DNREC should address all the mercury sources in this effort. The one that has not been mentioned is CitiSteel's operation of a 400,000 ton EAF. CitiSteel reported 39.1 pounds Hg in 2004. If they where limited to 35mg/ton or 75% reduction as in the New Jersey Regulation that would be a 30.8 pound Hg limit.