

From: John Austin [mailto:austin4102000@yahoo.com]
Sent: Monday, March 13, 2006 9:04 PM
To: Amirikian Ronald A. (DNREC)
Subject: Multi-Pollutant Reg Developement

I recently wrote the Governor on this topic with a CC: to you. Below are more detailed views on what we are looking for in the rule.

I do have a couple of questions

What is the allocation between Indian River and Edge Moor under the Clean Air Mercury Rule? Is it 50/50 or 67/33 as in EPA background?

I have not found the Motiva Permit on the web. What (if any) are its IGCC mercury limits?

March 13, 2006
Ronald Amirikian
Planning Supervisor
Air Quality Management Section
Delaware Department of Natural Resources and Environmental Control
156 S. State Street
Dover, DE 19901

Dear Mr. Amirikian,

As a citizen of Delaware, I am writing to provide more detailed views on aspects the Delaware Multi-Pollutant Regulation now under development.

I support limits designed to achieve a 90% or more reduction of sulfur dioxide, an 80% or more reduction of nitrogen dioxide, and a 90% or more reduction of mercury and a rule structured along the lines of the draft Maryland Healthy Air Act. Indian River reports 35,040,788 MMBtu heat input, 3,486,935 MWh generation in 2004 and release of 189 pounds mercury. Numerically, the limits based on Indian River's 2004 emissions would be a limit of sulfur dioxide of 0.13 lb/MMBtu, nitrogen oxides 0.07 lb/MM/Btu, and mercury 0.00000542 lb/MWh or 0.000000539 lb/MMBtu.

Particulate emissions should also be addressed and limited form current 0.3 lb/MMBtu requirements to 0.03 lb/MMBtu or less. This would be a 90% reduction, the same standard imposed in neighboring New Jersey, and STAPPA/ALAPCO model regulations.

Based upon the existing DNREC permit for the Motiva Refinery IGCC unit, I support a PM emission limit of 0.0076 lb/MMBtu, a limit on sulfur dioxide emissions of 0.022 lb/MMBtu, and a limit on nitrogen dioxide emissions of 0.07 lb/MMBtu for all IGCC electric generating units. IGCC units should be held to the same standard as other coal

units. A 90% capture efficiency and 0.00000542 lb/MWh or 0.000000539 lb/MMBtu. During its brief operation, the WePower Elm Road unit had a similar 5.6E-7 lb/MMBtu Wisconsin Permit limit.

The reduction efficiency for control of mercury emissions of the air pollution apparatus for control of mercury of any coal-fired or IGCC boiler should be based on valid stack emission tests performed each quarter and the megawatt hours produced each quarter. These results should be published publicly each quarter.

The rule should also prohibit power plants from purchasing allowances, or trading emissions credits with other companies or states. Why sell credits upwind that will dump downwind in Delaware? Why use credits to allow increased emissions in Delaware? The goal is to reduce mercury loadings in Delaware. Trading makes no sense.

I fervently wish to see mercury emissions eliminated to the greatest extent possible. Therefore, we seek that Delaware further limit the possible allocation of mercury emission to 37 pounds in 2010 and 3.7 pounds in 2015. Once reductions occur, backsliding should not be allowed.

After years of uncontrolled pollution, these facilities owe it to the people of Delaware to install technologies to limit emissions to the lowest achievable levels. Delaware deserves nothing less.

Regards,

John J. Austin, Jr.
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