

Montana Mercury Rule Testimony

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Outline of Testimony

- ❑ A little personal history
- ❑ STAPPA/ALAPCO
- ❑ Mercury: health effects, emissions, and sources
- ❑ History of rule development
- ❑ How the federal CAMR works
- ❑ State and Local Agency problems with CAMR
- ❑ The STAPPA/ALAPCO Model Rule
- ❑ What other states are doing
- ❑ Recommendations
- ❑ List of additional resources

Personal History

Personal History

- ❑ Grew up in Wisconsin; shared appreciation for the value of a clean environment
- ❑ BS Michigan State, MS Iowa State
- ❑ Supervisor of RAPCA—a six-county local air agency centered in Dayton, Ohio
- ❑ Started in 1973, agency supervisor since 1985
- ❑ Backpacked in the Beartooth Wilderness Area eight different years

Personal History

- ❑ Active nationally through STAPPA/ALAPCO
- ❑ New Source Review (NSR) Committee co-chair
- ❑ Energy Committee co-chair
- ❑ President in 1987 and currently
- ❑ Member of EPA's Clean Air Act Advisory Council (CAAAC) for six years

Personal History

- ❑ Served on EPA's Industrial Combustion Coordinated Rulemaking Advisory Committee
- ❑ Served on EPA's NSR reform advisory committee
- ❑ Served on EPA's National Air Pollution Control Techniques Advisory Committee
- ❑ Currently serve on EPA's Environmental Technology Verification Advisory Committee

Personal History

- ❑ Serve as legislative liaison for the Ohio Local Air Pollution Control Officers Association
- ❑ Co-chaired USEPA's Utility MACT federal advisory committee under CAAAC

STAPPA/ALAPCO

STAPPA/ALAPCO

- ❑ National associations representing the directors of our nations state and local air agencies
- ❑ State and Territorial Air Pollution Program Administrators (54 states and territories)
- ❑ Association of Local Air Pollution Control Officials (165 local agencies nationwide)
- ❑ Soon to be combined under the National Association of Clean Air Agencies (NACAA)

STAPPA/ALAPCO

- ❑ National office with an Executive Secretary and staff in Washington, DC
- ❑ The primary mode of communication on air pollution issues for state and local agencies
- ❑ Various committees—monthly calls
- ❑ Semi-annual full membership meetings
- ❑ National positions and testimony representing state and local agencies
- ❑ Studies and publications when requested by the members

STAPPA/ALAPCO Model Rules

- ❑ Operating Permits (February, 1993)
- ❑ Meeting the 15% Rate-of-Progress Requirement (September, 1993)
- ❑ Transportation and General Conformity (June, 1994)
- ❑ Controlling Nitrogen Oxides (July, 1994)
- ❑ Controlling Particulate Matter (July, 1996)
- ❑ Reducing Greenhouse Gases & Air Pollution (October, 1999)
- ❑ Regulating Air Emissions from Paint (October, 2000)
- ❑ Regulating Air Pollution from Diesel Trucks (July, 2001)
- ❑ New Source Review (June, 2004)
- ❑ Cleaning Up Diesel Trucks (September, 2004)
- ❑ Regulating Mercury from Power Plants (November, 2005)
- ❑ Controlling Fine Particulate Matter (March, 2006)

Mercury: Health Effects, Emissions, and Sources

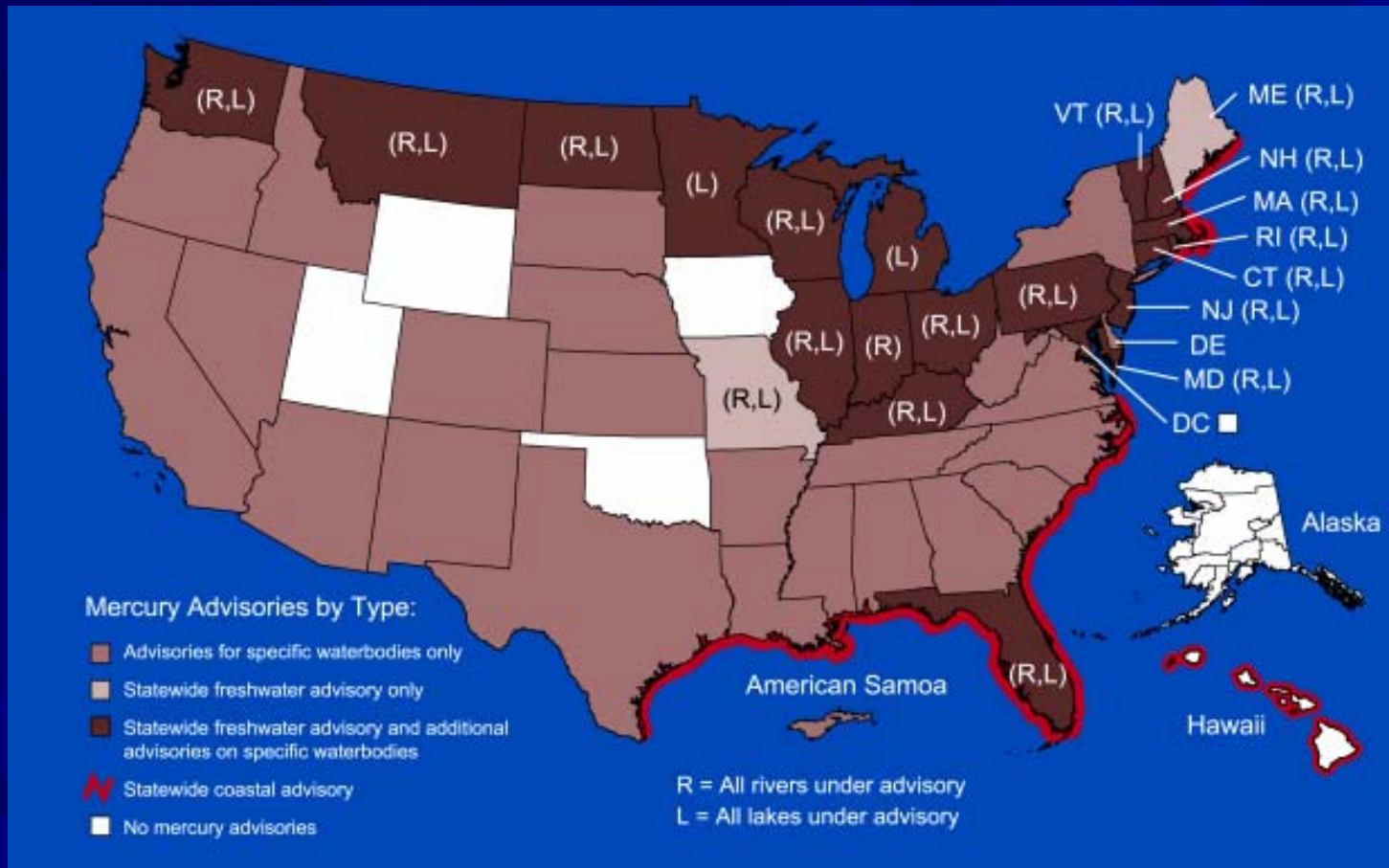
Mercury is a Serious Health Problem

- ❑ Powerful neurotoxin that accumulates in the food chain
- ❑ As little as 1/70th of a teaspoon can contaminate all the fish in a 25-acre lake
- ❑ Can cause damage to brain and nervous system, neurological disorders, delayed development, learning disabilities
- ❑ Especially harmful to children and developing fetuses
- ❑ 6% - 15% of women of childbearing age may be exposed to mercury above “safe” level
- ❑ Emerging data show correlation between heart attacks in men and mercury exposure

Mercury is a Pervasive Problem in the U.S.

- ❑ Coal-fired power plants are largest source of mercury air emissions = 48 tons of mercury per year
- ❑ 45 states issued fish consumption advisories for mercury
- ❑ Mercury concentrations and deposition levels are similar in the east and west

States with Mercury Fish Consumption Advisories (2002)

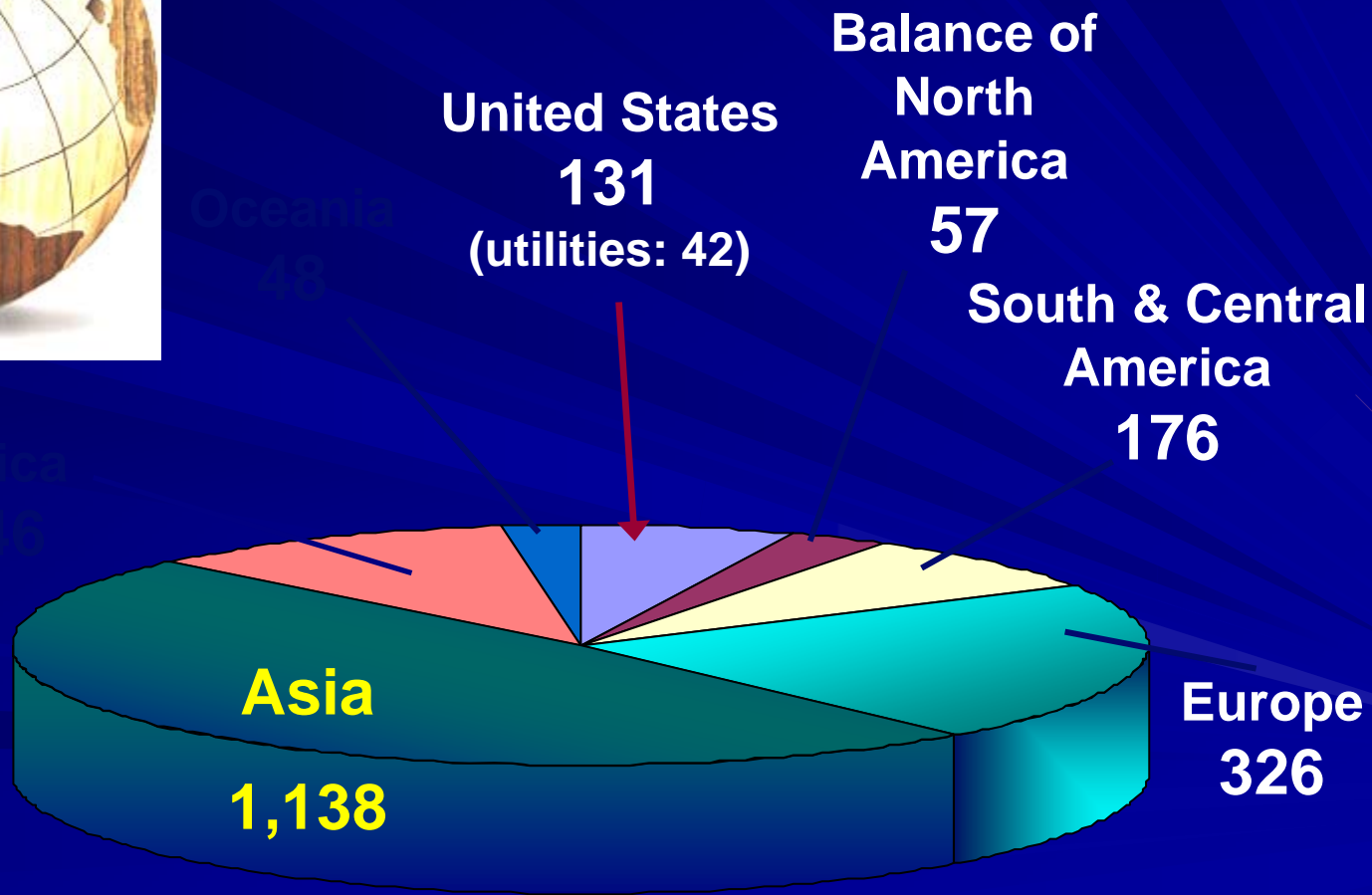


NOTE: This map depicts the presence and type of fish advisories issued by the states for mercury as of December 2002. Because only selected waterbodies are monitored, this map does not reflect the full extent of chemical contamination of fish tissues in each state or province.

Mercury Global Emissions - Anthropogenic Emissions by Continent

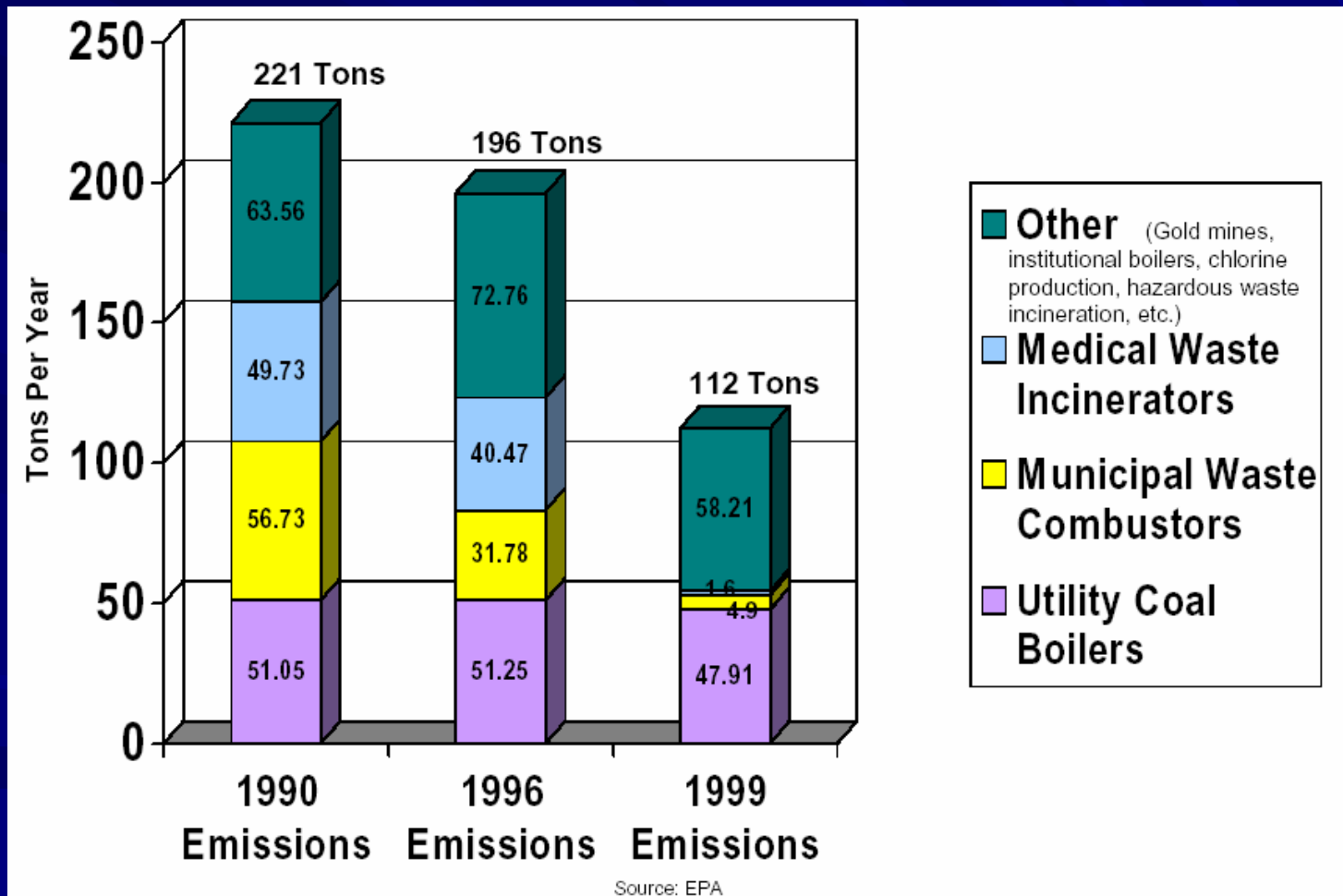


Global total: 2,122 Mg/y



(Adapted from EPRI, 2004)

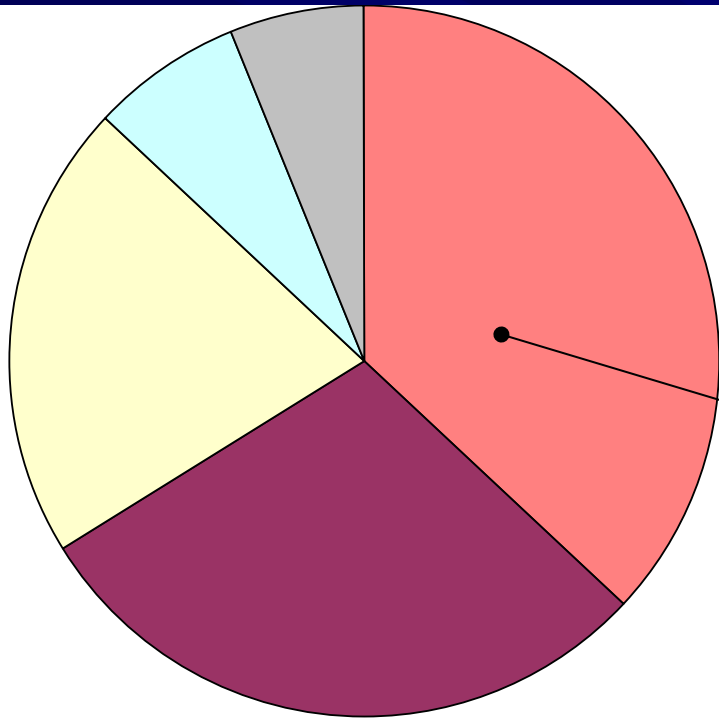
U.S. Emissions of Human-Caused Mercury Have Dropped 45% since 1990



Note: 1999 emission estimate for utility coal boilers is based on 1999 Information Collection Request (ICR); 1990 and 1996 are based on different methodology.

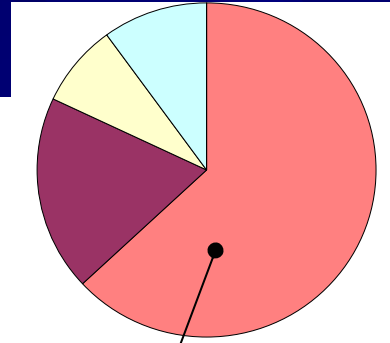
Power Generation Is a Major Source of Emissions

1999 Mercury



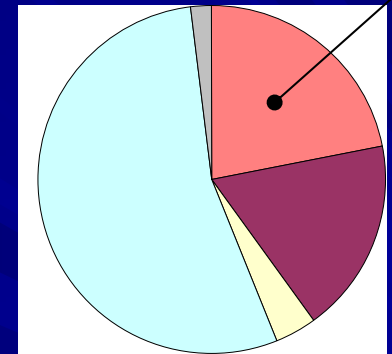
Utilities (40%)

2000 Sulfur Dioxide



Utilities (63%)

2000 Nitrogen Oxides



Utilities (22%)

- Fuel Combustion-electric utilities
- Other stationary combustion *
- Industrial Processing
- Transportation
- Miscellaneous

* Other stationary combustion includes residential and commercial sources.

Current CAAA Requirements for Utilities

NSR Permits for new sources & modifications that increase emissions

Ozone

1-hr Serious Area Attainment Date

OTC NO_x Trading

NO_x SIPs Due

Designate areas for 8-hr Ozone NAAQS

1-hr Severe Area Attainment Date

NO_x SIP Call Reductions

Marginal 8-hr Ozone NAAQS Attainment Date

8-hr Ozone Attainment Demonstration SIPs due

Assess Effectiveness of Regional Ozone Strategies

Possible Regional NO_x Reductions ? (SIP call II) ²

Moderate 8-hr Ozone NAAQS Attainment Date

Serious 8-hr Ozone NAAQS attainment Date



Phase II Acid Rain Compliance

Mercury Determination

Interstate Transport Rule to Address SO₂/NO_x Emissions for Fine PM NAAQS and Regional Haze

Proposed Utility MACT

Designate Areas for Fine PM NAAQS

Final Utility MACT

New Fine PM NAAQS Implementation Plans

Regional Haze SIPs due

Compliance with Utility MACT

Acid Rain, PM_{2.5}, Haze, Toxics

Latest attainment date for Fine PM NAAQS ³

Compliance for BART Sources

Compliance for BART sources under the Trading Program

Second Regional Haze SIPs due

The Challenge Facing Utilities, the Public, and the State and Local Regulators

Certainty

- ❑ Industry wants certainty that controls will be sufficient without a need for further controls down the road
- ❑ The public wants certainty that the air they breathe, the water they drink, and the food they eat is safe
- ❑ Regulators want certainty that rules will be sufficient to address the problems

Competing Priorities

- ❑ Price of Electricity
- ❑ Preservation of Coal Markets
- ❑ Price of Natural Gas
- ❑ Time for Installation of Controls
- ❑ Physical Restrictions
- ❑ What to do with Older Boilers (69% of utility boilers are 30 years old or older; do you control or phase out?)

History of Rule Development for Control of Mercury from Utilities

State/Local Agency Historical Positions on Mercury Emissions

- ❑ Followed EPA studies and actions on mercury closely over a period of 20 years
- ❑ Letters to EPA in 1994, 1998, and 2000 with regard to 1990 CAAA requirements
- ❑ March 2001 meeting with EPA to discuss approach to control
- ❑ Active Participation in Utility MACT workgroup
- ❑ May 2002 STAPPA/ALAPCO multi-pollutant strategy principles
- ❑ Membership discussions on a regular basis

MARCH 2001 MEETING WITH EPA-Recommendations

- ❑ Attended by a number of state representatives
- ❑ Minimal subcategorization of the industry;
- ❑ The most stringent levels of mercury control possible;
- ❑ A multi-pollutant approach;
- ❑ Enhanced ability for States to implement the standards;
- ❑ Early compliance encouraged through the use of incentives; and
- ❑ No trading of toxics.

STAPPA/ALAPCO Energy Principles

- ❑ Guiding principles to use in assessing national legislation
- ❑ Integrated approach for utilities
- ❑ Address all significant emissions
- ❑ BACT level national caps
- ❑ Minimum level of controls on each plant
- ❑ Encourage early reductions
- ❑ Firm deadlines, interim steps
- ❑ NSR measures retained

STAPPA/ALAPCO Energy Principles

- ❑ Emissions trading with local protections (trading can buy time for control of specific units, but not exemption)
- ❑ Encourage energy efficiency
- ❑ Address distributed generation
- ❑ Retain local authorities to be more stringent

EPA Actions

- ❑ 1998 report to Congress
- ❑ December 2000 Regulatory finding
 - ❑ Necessary and appropriate to regulate under section 112 of the Act
 - ❑ Mercury listed as HAP of greatest concern; others as potential concern
- ❑ Met with various stakeholder groups April 2001
- ❑ Convened the Utility MACT working group August of 2001

Membership of Utility MACT Working Group

- ❑ Six members representing State/Local/Tribal Agencies
- ❑ Eight members representing Environmental Organizations
- ❑ Fourteen members representing Industry
- ❑ One member representing Control Equipment Vendors
- ❑ Two members representing coal interests, producers and Unions
- ❑ WEST Associates added in order to bring to the table Western interests

Utility MACT Working Group

- ❑ Formed for initial period of one year.
 - ❑ First meeting August 2001.
 - ❑ Subsequent meetings nearly every month through October, 2002. Met 13 times over 18 months.
- ❑ Identified issues and clearly documented stakeholder positions on all issues
- ❑ Full documentation of the working group meetings, including all presentations is available at: <http://www.epa.gov/ttn/atw/combust/utiltox/utoxpg.html>

Note

- ❑ The Utility MACT Working Group met the Administration's definition of the proper way to approach regulation
 - ❑ All the stakeholders were at the table
 - ❑ The process was open and transparent

Important Notes

- ❑ In all our meetings, there was never a hint that the Section 111 process was under consideration at EPA
- ❑ Trading was brought up but always quickly put down, because this is not allowed under Section 112
- ❑ EPA abandoned the working group without allowing it to finish its work—IPM and variability discussions were scheduled but never held

Post-Working Group Important Notes

- ❑ Department of Energy Office of Fossil Fuel aggressive program for control development
- ❑ Institute of Clean Air Companies conclusion that 50-70% reduction by 2008-2010 is possible
- ❑ Significant advancement in the areas of SCR/FGD enhancements and halogenated sorbents
- ❑ Especially significant advancement in the control of Western sub-bituminous coal mercury emissions

Process Went Downhill

- ❑ EPA abruptly reversed course in 2004
 - ❑ Revoked its 2000 decision to list utilities under section 112
 - ❑ Adopted controls under Section 111 of the Act
 - ❑ Adopted a cap-and-trade rule with an interim mercury cap of 38 TPY in 2010 and a “final” cap of 15 TPY in 2018
 - ❑ With banking, actual emissions are predicted at 24 TPY in 2020 and may never reach 15 TPY

The Downhill Slope

- ❑ Initial EPA “2001 Straw Proposal” was for a 90% control MACT standard—down to 5 TPY
- ❑ Original Clear Skies Legislation had 26 TPY mercury limit (co-benefits of NO_x/SO₂ controls)
- ❑ Industry recommendation through the working group was 26-31 TPY (MACT)
- ❑ Senate EPW hearing testimony 34 TPY (co-benefits)
- ❑ Final rule has interim cap at 38 TPY
- ❑ EEI modeling now shows 40 TPY (co-benefits)

How The Federal Clean Air Mercury Rule (CAMR) Works

EPA'S CAMR

- ❑ Promulgated March 15, 2005
- ❑ Cap and Trade Program built on CAIR
- ❑ Two-phased cap
 - ❑ 38 TPY cap in 2010
 - ❑ 15 TPY cap in 2018
- ❑ Each state assigned an emissions budget (#/yr) for each phase
- ❑ Banking of “early” emissions
- ❑ State plans due November 17, 2006

EPA'S CAMR

- ❑ 2010 cap is based on co-benefits from control of SO₂ and NO_x under CAIR
- ❑ Because of banking, actual mercury emissions in 2020 are expected to be 24 TPY and the 15 TPY cap is not predicted to be reached until some time after 2025

EPA's CAMR

- ❑ STAPPA/ALAPCO expressed formal opposition in testimony, comments
- ❑ ECOS position – EPA's approaches are inadequate to protect public health, inconsistent with the Clean Air Act, and do not account for available technology
- ❑ Children's Health Protection Advisory Committee – proposal does not go far enough to protect children, infants and women of child-bearing age
- ❑ Adverse comments from numerous state/local agencies, public interest groups, 45 Senators, others

State Suits on EPA'S CAMR

- New York
- New Jersey
- California
- Connecticut
- Maine
- Massachusetts
- New Mexico
- Pennsylvania
- Vermont
- Wisconsin
- New Hampshire

State and Local Agency Problems With CAMR

State/Local Agency Major Concerns About Proposal

- ❑ Not protective of public health and the environment
- ❑ Too Little; too late--Emission limits are not stringent enough; do not represent MACT; and the deadlines far too protracted
- ❑ Requirements do not reflect what is technically feasible
- ❑ Controls less stringent than even the industry recommendations from the FACA

State/Local Agency Major Concerns About Proposal

- ❑ Allows trading – hot spots a serious problem
- ❑ Ignores HAPs besides mercury and nickel
- ❑ Use of Section 111 – illegal and inappropriate
 - ❑ Will not address residual risk
 - ❑ Invites protracted legal battles
 - ❑ Will result in SIP-like state-by-state process, not uniform national approach

The STAPPA/ALAPCO Model Rule

STAPPA/ALAPCO MODEL RULE

- ❑ State and Local agencies, faced with an inadequate federal rule for mercury
- ❑ Requests from the membership for a model rule
- ❑ Membership workgroup formed to identify issues
- ❑ Legal consultant hired to work with key members to write model rule

STAPPA/ALAPCO MODEL RULE

- ❑ State of the Art Technology for new facilities, updated on a periodic basis
- ❑ Prohibition on trading
- ❑ Existing Sources: Option One (Phase in by efficiency of control)
 - ❑ Phase I—end of 2008
 - ❑ 80% capture (ave. in-state units); or
 - ❑ 0.01 lb/GWh (ave. in-state units)
 - ❑ Phase II—2012
 - ❑ 90-95% capture (plant site ave.); or
 - ❑ 0.0060 - 0.0025 lb/GWh (plant site ave.)

STAPPA/ALAPCO MODEL RULE

- ❑ Existing Sources: Option Two (Phase in by capacity with multi-pollutant control)
 - ❑ Phase I—end of 2008
 - 50% of MW controlled for mercury
 - ❑ Phase II—end of 2012
 - ❑ Nitrogen oxides between 1.0 -0.7 lb/MWh
 - ❑ Sulfur dioxide \leq 1.5 lb/MWh or 95% fuel sulfur capture
 - ❑ Particulate matter 0.030 - 0.015 lb/MMBTU
 - ❑ Mercury 0.0060 - 0.0025 lb/GWh or 90-95 % capture

What Other States Are Doing

Clean Air Act

Findings and Purposes

- ❑ Section 101(a) The Congress finds---
 - (3) that air pollution prevention (that is the reduction or elimination, through any measures, of the amount of pollutants produced or created at the source) and air pollution control at its source is the primary responsibility of States and local governments

State Rules Connecticut

- ❑ Connecticut General Statute 22a-199
 - ❑ 0.6 #/TBTU or 90% reduction by 2008
 - ❑ Resultant total Hg emission of approximately 31 pounds.
- ❑ Clean Air Mercury Rule
 - ❑ Connecticut's Mercury Budget
 - ❑ 106 Pounds in 2010
 - ❑ 42 Pounds in 2015
 - ❑ Evaluating strategy to remove excess allowances from budget.
- ❑ Affected Units
 - ❑ PSEG Bridgeport Harbor #3, installing activated carbon injection and fabric filter control system.
 - ❑ AES Thames 1& 2, fluidized bed units w/ limestone injection & fabric filters and meet 0.6 #/TBTU emission rate.
- ❑ No interstate trading

State Rules

Maine

- ❑ All facilities in Maine have an emissions limit of 50 #/yr
- ❑ Proposed legislation lowers this to 35 #/yr in 2007 and 25 #/yr in 2010
- ❑ One EGU in Maine is subject to the federal rule; but Maine disagrees with EPA's determination
- ❑ No interstate trading

State Rules

Massachusetts

- ❑ Adopted rule
- ❑ 85% capture or 0.0075 #/GWh by January 1, 2008
- ❑ 95% capture or 0.0025 #/GWh by October 1, 2012
- ❑ No interstate trading

State Rules

New Hampshire

- ❑ Legislation passed House and Senate, signed by Governor
- ❑ 80% reduction through installation of scrubber technology by July 1, 2013
- ❑ SO₂ emissions credits for early mercury reductions
- ❑ No interstate trading

State Rules New Jersey

- ❑ Adopted Rule
- ❑ 3.00 mg/MWh or 90% control across control device as of December 15, 2007 (one year extension possible)
- ❑ Multi-pollutant control option--December 15, 2012;
 - ❑ nitrogen oxides ≤ 0.100 lbs/MMBTU (dry bottom utility boilers); ≤ 0.130 lbs/MMBTU (wet bottom utility boilers) based on 30 days rolling avg.;
 - ❑ sulfur dioxide ≤ 0.150 lbs/MMBTU based on 30 days rolling avg; and
 - ❑ particulate matter ≤ 0.030 lbs/MMBTU based on USEPA Test Method 5;
 - ❑ 50% of MW controlled for mercury by 12/15/2007; 100% by 12/15/2012
- ❑ No interstate trading

State Rules

New York

- ❑ Stakeholder process ongoing
- ❑ Legislative proposal calls for 90% reduction as a part of a multi-pollutant control program
- ❑ No interstate trading

State Rules Delaware

- ❑ Governor's proposal—stakeholder process
- ❑ Multi-pollutant controls for NO_x, SO₂, Hg
- ❑ Coal and Residual Oil-fired units >25 MW
- ❑ Also discussing CO₂
- ❑ No interstate trading

State Rules

Maryland

- ❑ Passed legislation
- ❑ Maryland Healthy Air Act
- ❑ Multi-pollutant controls
 - ❑ 80% reduction in Hg by 2010
 - ❑ 69% reduction in NO_x by 2009
 - ❑ 78% reduction in SO₂ by 2010
 - ❑ 10% reduction in CO₂ by 2018
- ❑ No interstate trading

State Rules Pennsylvania

- ❑ Proposed rule—approved by Environmental Quality Board on May 17
- ❑ 80% Hg reduction by 2010
- ❑ 90% Hg reduction by 2015 or 1.2 #/TBTU
- ❑ No interstate trading

State Rules Virginia

- ❑ Clean Smokestacks Legislation effective 7/1/2006
- ❑ Adopts CAMR with limitations
- ❑ Largest source must comply by 2015 and cannot purchase credits
- ❑ 2nd largest can purchase credits from sources within state or within 200 km
- ❑ Units in nonattainment areas cannot purchase credits
- ❑ New source set aside of 5% for 1st 5 years, 2% thereafter

State Rules Georgia

- ❑ Proposed rule—taking comments on alternatives
- ❑ 80-85% control by 2010
- ❑ 90% control by 2012-2015
- ❑ >90% control later if technology is feasible
- ❑ In state averaging is possible
- ❑ No interstate trading

State Rules

Illinois

- ❑ Proposed rule—Governor's request
- ❑ By 6/09, 90% reduction with in-state trading, no unit less than 75% control
- ❑ By end of 2012 all plants 90% control
- ❑ No interstate trading

State Rules Indiana

- ❑ Citizen's petition for 90% control—
stakeholder process ongoing
- ❑ Three options under discussion
 - ❑ CAMR
 - ❑ Modified CAMR
 - ❑ 90% control by 2010 with no trading

State Rules Michigan

- ❑ June 2005 stakeholder report to governor
- ❑ Governor wants 90% control by 2015
- ❑ First phase will maximize co-benefits of CAIR
- ❑ Second phase will require 90% control
- ❑ System-wide averaging as long as hot spots do not occur
- ❑ No interstate trading

State Rules

Minnesota

- ❑ Mercury Reduction Act of 2006
- ❑ Three coal-fired power plants in the state
- ❑ 90% control by 2015
- ❑ Legislation passed the Minnesota House and Senate unanimously
- ❑ No interstate trading

State Rules Washington

- ❑ Proposed legislation, but no progress
 - ❑ 90% control or 0.6#/TBTU by 2010
- ❑ The Department of Ecology would like to investigate the integration of mercury controls with controls for regional haze (2013-2014 timeframe)
- ❑ Trading may be allowed to buy time

State Rules

North Carolina

- ❑ Clean Smokestacks Act (CSA) co-benefits will reduce mercury emissions from power plants in NC by 60-65% by 2013
- ❑ Draft rules were approved by the Environmental Management Commission for public hearings in May-June
- ❑ Draft rules are two-phased, with all coal-fired power plant units not controlled under CSA to be controlled or shut down by the end of the second phase
- ❑ Three options are presented for controls on new sources:
 - ❑ NSPS;
 - ❑ BACT-like; or
 - ❑ 90% control
- ❑ Final action by EMC is anticipated in September 2006

State Rules Wisconsin

- ❑ October, 2004 rule
 - ❑ 40% Hg reduction by 2010
 - ❑ 75% Hg reduction by 2015
 - ❑ 80% Hg reduction by 2018 (goal)
- ❑ State rule requires a true-up to the Federal Rule, which Wisconsin is currently undertaking
- ❑ Interstate trading is an open issue at this time

States More Stringent Than CAMR Now or Proposed

- Connecticut
- Massachusetts
- New Hampshire
- New Jersey
- New York
- Delaware
- Maryland
- North Carolina
- Maine
- Pennsylvania
- Georgia
- Illinois
- Michigan
- Minnesota
- Montana
- Washington
- Wisconsin
- Virginia

States Adopting CAMR

- West Virginia
- Alabama
- Mississippi
- South Carolina
- Tennessee
- Ohio
- Texas
- Iowa
- Alaska
- Kansas
- Missouri
- Nebraska
- North Dakota
- South Dakota
- Utah
- New Mexico
- Wyoming
- Louisiana
- Kentucky

States Still Considering Options

- ❑ Oklahoma (three options)
 - ❑ CAMR
 - ❑ S/A Model Rule
 - ❑ Possible Hybrid
- ❑ Indiana (state petition)
- ❑ Florida (participation in interstate trading not likely until after 2018)
- ❑ Colorado (cap existing utility emissions at 2005 level and provide allowances for new units)

States Still Considering Options

- ❑ Arizona (probably not CAMR)
- ❑ California (probably not CAMR)
- ❑ Arkansas (CAMR and alternatives)
- ❑ Hawaii (considering CAMR)
- ❑ Nevada (concentrating on mining rule)
- ❑ Oregon (CAMR initially, 2012 review)

States With No Coal-fired Utility Plants

- Idaho
- Rhode Island
- Vermont

Recommendations

State/Local Agency National Program Recommendations

- ❑ Regulate under Section 112
- ❑ 90% control for sources using bituminous coal
- ❑ 80% control for sources using subbituminous coal
- ❑ National emission reduction between 85-90%
- ❑ Deadlines – Section 112 has 3-year compliance period, also allows additional time; follow the process
- ❑ Control other HAPs in addition to mercury and nickel (surrogate limits on particulates and acid gases)
- ❑ Limited trading; no banking
- ❑ Coordinated multi-pollutant controls
- ❑ Stringent BACT for new units

Technology is the Key

- ❑ Development of good control technology will protect coal's future and provide certainty to all stakeholders
- ❑ Good control technology for mercury can be exported and used to reduce global emissions
- ❑ The U.S. should assume a leadership position in control technology development

Recommendations for a State Specific Program

- ❑ 90+% Hg control (12-month rolling ave.)
- ❑ Consider Best Available Controls by plant
 - ❑ Provide the certainty everyone desires
- ❑ Integrated approach for all pollutants
 - ❑ SO₂, NO_x, fine Particulate, mercury
- ❑ Reward best integrated controls with time
- ❑ Prohibition on interstate trading

The Future

- ❑ November 18, 2006 deadline for state plans
- ❑ What does the national trading system look like with 15-18 states not participating?
- ❑ Legal battles continue
- ❑ Greatest certainty will be in those states with stringent (90-95% control) rules

Additional Resources

Additional Resources

- ❑ Electric Utility Steam Generating Units Section 112 Rule Making EPA Web Site <http://www.epa.gov/ttn/atw/combust/utiltox/utoxpg.html>
- ❑ Reports to Congress, Information Collection Requests, Regulatory Findings, Utility MACT Workgroup Minutes and Presentations, Official Docket Index, Model Run Results, Stack Test Results

Additional Resources

- ❑ National Energy Technology Laboratory
Mercury Emissions Control Web Page
<http://www.netl.doe.gov/technologies/coalpower/ewr/mercury/index.html>
- ❑ Field Testing Results, Economic Analyses
of Control Technologies, Status of Control
Technologies

Additional Resources

- ❑ STAPPA/ALAPCO Web Site
<http://www.4cleanair.org/index.asp>
- ❑ Links to all state and local program web sites, link to the STAPPA/ALAPCO Mercury Model Rule, other air pollution control resources

Additional Resources

- ❑ EPA's Office of Inspector General Air Program Web Site <http://www.epa.gov/oig/reports/air.htm>
- ❑ Monitoring Needed to Assess Impact of EPA's Clean Air Mercury Rule on Potential Hotspots, Report No. 2006-P-00025
- ❑ Additional Analyses of Mercury Emissions Needed Before EPA Finalizes Rules for Coal-Fired Electric Utilities, Report No. 2005-P-00003