

Further analysis, engineering, testing and equipment modifications would be necessary to determine if these options would improve Hg control. However, it is clear that adding more brominated PAC, as was assumed in the Final Rule, is not adequate, given the properties of lignite, compliance margin necessary, and limitation of mine mouth facilities in regards to fuel staging (i.e. must use coal received from mine; unable to fire only certain coals that have a more ideal or predictable range of Hg content during a 30-day rolling average).

It should be noted that the achievable Hg emission rate should not be construed to represent an enforceable regulatory or proposed permit limit. Corresponding permit limits must consider normal operating fluctuations and coal variability and take into account a minimum additional 20% margin for these fluctuations. Since a combination of new and/or upgraded control systems would be expected to be required, obtaining a guarantee from a single vendor to ensure that the unit achieves compliance below the permit limit will be challenging.