

32. With existing equipment, the recent testing results demonstrate that MRY is unable to achieve the New Mercury Limitation on an hourly basis at full load. Further, Minnkota has no information or data supporting the conclusion that MRY 1 or MRY 2 could achieve the New Mercury Limitation on a 30-day rolling basis while operating at full load. The short-term testing data suggest that even a longer-term averaging period would not result in compliance.

33. In fact, Minnkota plotted the recent test results to project the removal rate at a brominated PAC injection rate of 3.0 lb/MMacf, which is a higher injection rate than the existing MRY equipment can achieve, but is consistent with EPA's achievability conclusion in the Beyond-the-Floor Memorandum and Final Rule. The trend line shows an estimated maximum mercury removal rate of less than 80%. The plotted trend line, based on the test values, is far below EPA's conclusion (consistent with the ACI Fuel 2010 Article) that injection of brominated PAC at the rate of 3.0 lb/MMacf will result in a 90% removal rate. Rather, the trend line levels off, demonstrating that increasing the amount of brominated PAC injected