

percentages for various lignite units across the country. EPA reports that lignite plants would need to remove up to 95% of mercury in the flue gas to meet the new limit based on 2022 data. 89 Fed. Reg. at 38547.

30. After the release of the proposed MATS RTR, Minnkota performed testing to evaluate the capability of its current mercury reduction system at MRY 1 and to examine the feasibility of EPA's mercury removal assumptions as applied to MRY 1. *See Attachment A*. Minnkota used its existing mercury control system to apply PAC and M-Prove sorbent, both of which MRY uses routinely for mercury control. Minnkota added as much PAC and Potassium Iodide sorbent as the MRY conveyors, injection lances, and associated components would allow, based on their maximum performance design capabilities and consistent with good engineering practices. As described in more detail in the Mercury Testing 2024 Report (**Attachment A**) the test results showed: