

residence time for the flue gas to be exposed to the injection of powder activated carbon (PAC), also known as activated carbon injection (ACI) in the Final Rule.

16. Minnkota uses the same mercury control strategies for both Units. Minnkota currently uses a fuel additive system to apply a Potassium Iodide fuel additive sorbent known as M-Prove procured from ARQ (formerly ADA). Minnkota injects non-halogenated PAC post-combustion. The fuel additive system was designed to meet the original 2012 MATS limitation for lignite units of 4.0 lb/TBtu, with a margin for compliance due to the variability of lignite coals.

17. MRY 1 and 2 at the Young Station combust lignite coal. The Young Station's lignite supply comes exclusively from BNI Coal Inc. (BNI), which is in close proximity to the plant. The lignite supplied by BNI is run-of-mine (ROM) coal that contains impurities and does not conform to a single mineral content or heat value specification. For this reason, the ROM supply currently varies in mercury content from 4.9 lb/TBtu to 18.6 lb/TBtu, based on recent mercury content testing. *See* Sargent & Lundy, "Mercury