

28. Minnkota is unaware of any verified testing or evidence that demonstrates that lignite units can meet the New Mercury Limitation of 1.2 lb/TBtu at full load. EPA finds that by using brominated activated carbon, without regard for equipment performance design, “greater than 90 percent Hg control can be achieved at lignite-fired units,” 89 Fed. Reg. at 38547, and cites for support a beyond-the-floor memorandum from the 2012 MATS rule, Kevin Culligan, SPPD/OAQPS to EPA-HQ-OAR-2009-0234, “Emission Reduction Costs for Beyond-the-floor Mercury Rate for Existing Units Designed to Burn Low Rank Virgin Coal” (Dec.16, 2011) [hereinafter Beyond-the-Floor Memorandum], **Attachment C**. EPA concludes that “units could meet the final, more stringent, emission standard of 1.2 lb/TBtu by utilizing brominated activated carbon at the injection rates suggested in the beyond-the-floor memorandum from the 2012 MATS Final Rule.” 89 Fed. Reg. at 38547. To support this removal rate, the Beyond-the-Floor Memorandum cites a technical publication: Sjostrom, “Activated carbon injection for mercury control: Overview,” Fuel Vol. 89, Issue 6, at 1320-22 (June 2010) [hereinafter ACI Fuel 2010 Article], **Attachment D**.