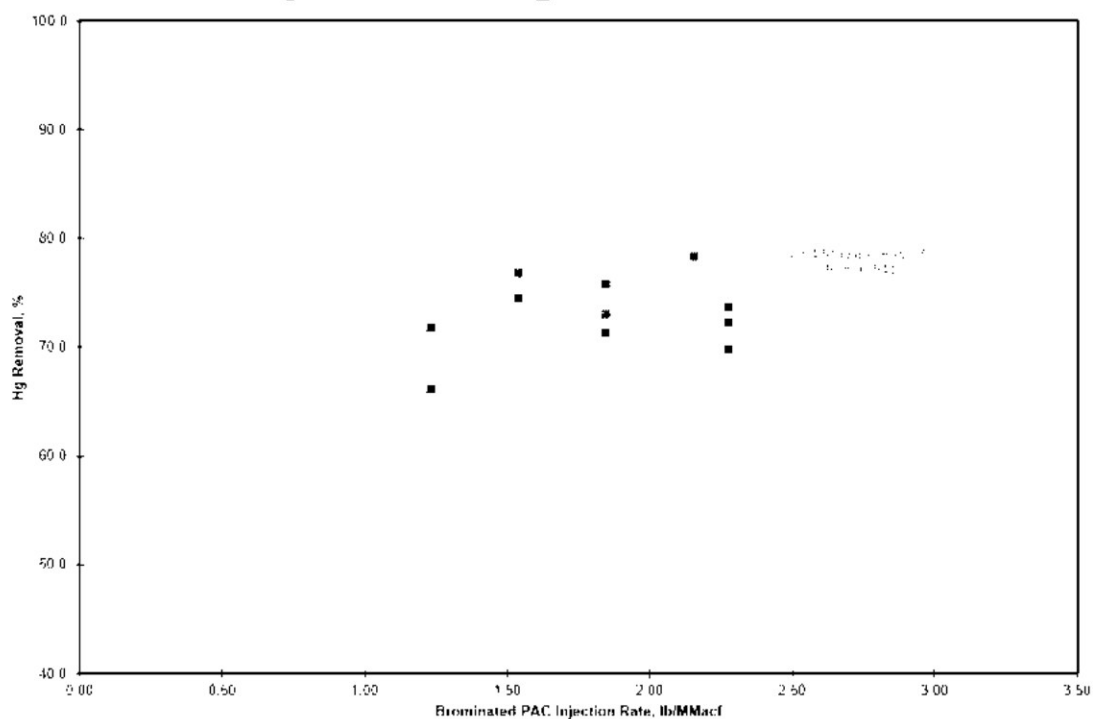


into MRY Unit 1 is not an adequate control strategy to achieve the New Mercury Limitation and that EPA ignored and erroneously omitted limitations of ACI in its achievability conclusion . **Attachment A**, at Figure 2-1. The scatterplot from the Report is presented below.

Figure 2-1 — MRY Unit 1 Existing System Mercury Removal Performance Capabilities using Brominated PAC



34. Mercury testing and analysis of data at MRY confirms and supports Minnkota’s belief that numerous variables affect its mercury emissions rate. Specifically, Minnkota observed mercury emissions rate fluctuations based on unit load, mercury content in lignite, and normal variability in unit operation and control equipment function. Some hourly