

RTR,” EPA-HQ-OAR-2018-0794-5956, at Section 6.3.1 EIA Hg-Sulfur Relationship (June 19, 2024) [hereinafter Cichanowicz Technical Report], **Attachment B**. The higher sulfur content found in lignite fuels inhibits the ability of injected sorbents to reduce mercury emissions at lignite plants. The mercury content also results in higher levels of SO₃ formed, which significantly limits the mercury emission reduction potential of emission controls at lignite plants. *Id.*

27. Minnkota has used the same technology (combination of sorbent injection plus a chemical additive (oxidizing agent)) as its primary mercury control strategy since the MATS rule came into effect. While there are many variations of PAC on the market, in Minnkota’s experience with these products, no PAC product has been identified as more successful than the others at MRY. Therefore, Minnkota has continued to use activated carbon injection as its primary mercury control system. Minnkota is not aware of any new developments in practices, processes, and control technologies in mercury control since the original MATS rule’s technology evaluation.