

The ACI Fuel 2010 Article presents a chart that compiles mercury removal test results from Department of Energy (DOE) mercury control systems. The ACI Fuel 2010 Article scatterplot presents a variety of results under different conditions and equipment configurations. The ACI Fuel 2010 Article dataset contains only one lignite datapoint, which is a unit equipped with a fabric filter. Fabric filters aid in mercury removal because of increasing residence time and temperature differential. The raw testing data from the ACI Fuel 2010 Article is not available in the docket. Given that the dataset (1) uses a single lignite data point (containing Fabric Filter controls), (2) fails to include the backup testing data, and (3) lacks data from ESP-equipped units like the MRY Units, the scatterplot in the ACI Fuel 2010 Article does not support the conclusion that a emissions standard based on 90% mercury removal can be achieved across the lignite industry, particularly with respect to lignite-fired units that are not equipped with a fabric filter.

29. Concluding that mercury removal over 90% is possible and equates to meeting the New Mercury Limitation, EPA calculates the removal