

Annual mercury emissions for Centralia and PMEC

Based on regulatory levels proposed or enacted by EPA and other states

Source of limit	Emission rate	Emission rate units and Notes	Centralia	PMEC	Total	Below 140?
			pounds Hg/year			Y/N
Washington potential proposals						
	0.6 lb/TBtu	Capture efficiency of	73.5	24.7	98.2	Y
	0.9 controls		33.8	29.6	63.4	Y
	0.0088 lb/GWh		99.6	39.3	139.0	Y
STAPPA Model rule						
	<i>New plants</i>					
	0.006 lb/GWh	(high range)	67.9	26.8	94.7	Y
	0.0025 lb/GWh	(low range)	28.3	11.2	39.5	Y
	0.95 controls	Capture efficiency of	16.9	29.6	46.5	Y
	<i>Existing plants in 2009</i>					
	0.01 lb/GWh		113.2	44.7	157.9	N
	0.8 controls	Capture efficiency of	67.7	118.4	186.1	N
	<i>Existing plants after 2012</i>					
	Same as new plants					
EPA NSPS, PC plants						
	<i>Original rule requirement</i>					
	0.042 lb/GWh		475.6		564.9	N
	<i>Revised rule requirement</i>					
	0.066 lb/GWh		747.3		836.7	N
EPA NSPS, IGCC plants						
	0.02 lb/GWh			89.4		
EPA MACT proposal (1/30/2004)						
	<i>Existing units</i>					
	0.061 lb/GWh		690.7		780.1	N
	5.8 lb/TBtu		710.5		799.9	N
	<i>New units</i>					
	0.02 lb/GWh		226.5	89.4	315.8	N

Source of limit		Emission rate units and Notes	Centralia	PMEC	Total	Below 140?
Emission rate						
Oregon Proposal						
	0.6 lb/TBtu		73.5	32.9	106.4	Y
	0.9 Overall removal		175.1	59.2	234.3	N
Montana Proposal						
	0.9 lb/TBtu		110.2	37.0	147.2	N
Arizona Final rule						
	0.0087 lb/GWh		98.5	38.9	137.4	Y
	0.9 Overall removal		175.1	59.2	234.3	N
Pennsylvania Proposal						
	<i>Control as of 2010</i>					
	0.024 lb/GWh		271.8		293.2	N
	0.8 Overall removal		350.2		371.7	N
	<i>Control as of 2015</i>					
	0.012 lb/GWh		135.9		157.3	N
	0.9 Overall removal		175.1		196.6	N
	<i>IGCC limit</i>					
	0.0048 lb/GWh			21.4		
Massachusetts Proposal						
	<i>by 2008</i>					
	Capture efficiency across					
	0.85 control device		50.8	88.8	139.6	Y
	0.0075 lb/GWh		84.9	33.5	118.4	Y
	<i>by 10/1/2012</i>					
	Capture efficiency across					
	0.95 control device		16.9	29.6	46.5	Y
	0.0025 lb/GWh		28.3	11.2	39.5	Y
New Jersey						
	Capture efficiency across					
	0.9 control device		33.8	59.2	93.0	Y
	0.0066 lb/GWh		74.7	29.5	104.2	Y
	(3 mg/MWh)					

Source of limit		Emission rate units and Notes	Centralia	PMEC	Total	Below 140?
Emission rate						
Connecticut Rule						
0.9 Overall removal			175.1	59.2	234.3	N
0.6 lb/TBtu			73.5	24.7	98.2	Y
90% control or 0.6 lb per trillion Btu (whichever is less stringent) by 2008 (statute).						
Delaware Proposal						
<i>by 2009</i>						
Capture efficiency across						
0.8 control device			67.7	118.4	186.1	N
1 lb/TBtu			122.5	41.1	163.6	N
<i>by 10/1/2013</i>						
Capture efficiency across						
0.9 control device			33.8	59.2	93.0	Y
0.6 lb/TBtu			73.5	24.7	98.2	Y
Illinois Proposal						
<i>Existing facilities as of 2010. New facilities as of 2007</i>						
0.9 Overall removal			175.1	59.2	234.3	N
0.008 lb/GWh			90.6	35.7	126.3	Y
New York						
<i>new units as of 2010, existing units starting in 2015</i>						
0.6 lb/TBtu			73.5	24.7	98.2	Y

1. The 140 lb/yr criteria is the 156 lb/yr allocation minus the public health set aside of 15.6 lb.

2.

All states except Delaware, New Jersey, and Massachusetts are proposing the % control efficiency from the "as received" coal to the top of the stack.

Proposed emission limits for US sited IGCC plants and annual Hg if applied to PMEC proposal	
Mesaba Energy Project, State's proposed limit 0.5 lb/TBtu	PMEC limit, lb/yr 20.551
Mesabi Energy Project Owner's proposed limit 0.011 lb/GWh	49.1436
ENW proposal in SCA 1.2 lb/TBtu	49.3223
Stanton Energy Center proposal 0.01 lb/GWh	44.676