

Public Comments on the Washington State Department of Ecology's
Draft Settlement Agreement with TransAlta

November 9, 2009

Sarah Rees
Washington State Department of Ecology
Air Quality Program
P.O. Box 47600
Lacey, WA 98504-7600
Via email: AQcomments@ecy.wa.gov

RE: TransAlta Coal Plant Mercury and NOx Agreement

Dear Ms. Rees:

We, the undersigned organizations, submit these comments on the proposed Settlement Agreement and Consent Decree between the Washington Department of Ecology and the TransAlta Corporation regarding its coal plant located in Centralia, Washington. Many of these organizations are submitting more detailed comments under separate cover.

From health care professionals to park rangers, people across the state have grave concerns about the enormous amount of pollution from this coal plant. The plant is the number one source of greenhouse gases, mercury and haze in Washington State. The pollution from this plant negatively impacts air and water quality, threatens public health, contributes to climate change and degrades national treasures such as Mount Rainier and Olympic National Parks and Puget Sound. In addition to air pollution, there are other problems associated with the plant's upstream mining, release of other hazardous air pollutants, and uncertain management of coal combustion and sulfur waste. The array of pollution problems deserves greater public scrutiny.

We have two specific concerns with this Settlement Agreement.

1. This agreement is insufficient in controlling nitrogen oxide, the main cause of haze in our national parks and wilderness areas.

According to the National Park Service testimony at the Department of Ecology October public hearing on the issue: "The proposed consent decree does not require the best technology to reduce emissions of nitrogen oxides, a key component of visibility impairment at the parks. Our review of the technical support documents provided by the State concludes that applying the best technology to reduce nitrogen oxides (i.e., selective catalytic reduction technology) is both technically feasible and the most cost-effective option when considering the visibility

improvement that would occur at Mount Rainier, Olympic, and North Cascades National Parks, and nine other Class I wilderness areas administered by the U.S. Forest Service.”

Emissions of nitrogen oxide (NOx) are a component of ground level ozone and smog and contribute to acid rain. When NOx is combined with particulates, it reduces visibility. It also contributes to water quality problems.

2. The reductions required for toxic mercury emissions are insufficient and should be increased to 90 percent reduction. A voluntary 50 percent reduction is weaker than the 90 percent standard mandated by many states. The recent report – *Mercury Control Technologies at Coal-Fired Power Plants Have Achieved Substantial Emissions Reductions (October 2009)* – by the General Accountability Office demonstrates that 90 percent reductions in mercury emissions is achievable and cost-effective for plants like the TransAlta coal plant.

Mercury is a potent neurotoxin affecting the central nervous system. Exposure to it can damage the brain, spinal cord, kidneys and liver. Women of childbearing age are regarded as the population of greatest concern. Children who are exposed to mercury before birth may be at increased risk of poor performance on neurobehavioral tasks, such as those measuring attention, fine motor function, language skills, visual-spatial abilities and verbal memory. One of the major pathways to humans is through the consumption of fish with high mercury levels.

We hope the State will carefully consider our concerns. We know we can do better than this Settlement Agreement and more effectively address the pollution problems caused by the state’s only coal plant.

Sincerely,

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National Parks Conservation Association

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