

Pennsylvania Gets Tough



STATE TOPS FEDS ON MERCURY

By Kathleen A. McGinty



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THE COMMONWEALTH HAS been a leader in advancing clean coal technology. Pennsylvania is home to one of the nation's most progressive alternative energy portfolio standards, ensuring that 18 percent of all energy generated by 2020 will come from clean, efficient and advanced resources — not just traditional renewables, but also coal mine methane, waste coal and coal gasification.

The nation's first coal gasification-liquefaction plant is proposed for construction in northeastern Pennsylvania, where the plant will use waste coal to produce 40 million gallons of clean-burning diesel fuel each year. Yet, while Gov. Edward Rendell is working to promote clean coal in Pennsylvania, the U.S. Environmental Protection Agency is pushing a mercury reduction rule that would result in a very real and significant economic dislocation for the state's coal industry.

The federal rule encourages "fuel switching" because it requires little or no reductions from units using sub-bituminous coal mined in the West and places the most stringent requirements on coal mined in Pennsylvania — a feature that is contrary to achieving maximum mercury reduction.

Bituminous coal generally contains more mercury than sub-bituminous coal. But it also contains more chlorine, and chlorine enhances the removal efficiency of mercury control technology. So, controlled bituminous coal is "cleaner" with respect to mercury

than uncontrolled sub-bituminous coal. This is just one reason Pennsylvania opposes the federal mercury rule. The other is that the federal Clean Air Act expressly prohibits trading for toxics like mercury; however, EPA's mercury rule allows it.

Unlike other air contaminants that disperse broadly, mercury concentrates locally, creating toxic "hot spots." Recent EPA-funded research showed that nearly 70 percent of the mercury collected at an Ohio River Valley monitoring site originated from nearby coal-burning industrial plants. Other studies have had similar findings.

Although Pennsylvania is a strong proponent of trading and other market mechanisms in the appropriate context, allowing such a program for this highly toxic pollutant compromises the integrity of trading and jeopardizes its legitimate use as an effective tool to achieve cost-effective reductions.

Pennsylvania's state-specific rule presumes compliance for any existing electric generating unit combusting 100 percent bituminous coal and using the air pollution control technologies mandated by the Clean Air Interstate Rule. Emissions trading is prohibited, ensuring greater mercury emissions reductions in the commonwealth — at least 90 percent by 2015. EPA's rule calls for coal-fired utilities to reduce mercury emissions by 70 percent by 2018. But because it allows trading, the federal rule fails to guarantee we would see even a single ounce of mercury reduction in Pennsylvania.

The commonwealth's rule also is a cost-effective approach to mercury reduction. Not only does the state-specific plan follow the same timeline as the two-phased federal CAIR standard; it also enables utilities to realize the co-benefits of mercury reduction through the installation of CAIR-required control technology. Mercury-specific controls are not required.

To comply with CAIR, which is designed to reduce nitrogen oxide and sulfur dioxide emissions, coal-fired plants will have to install selective catalytic reduction systems, electrostatic precipitators and wet scrubbers on their coal-fired units.

While these technologies are developed to reduce other emissions, they realize significant collateral reductions in mercury. Pennsylvania's mercury reduction proposal protects and grows the market share for the state's bituminous coal industry while ensuring vastly greater protections to improve the environment and keep residents safe and the economy strong. ☒

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