

Comments to Citizens Advisory Council

Tom Schuster, on behalf of Sierra Club

9/15/15

Re: proposed RACT II standards and Brunner Island power plant

Good morning. I have appeared before this council several times in the past to express concerns with the pending rule known as Reasonably Available Control Technology (RACT) for NO_x and VOCs. I want to be clear that Sierra Club appreciates the fact that the RACT rule will significantly limit smog-causing NO_x pollution from most coal-fired power plants in the state. This is a vast improvement over the original RACT proposal published in April 2014, and we do not want to delay that rule from taking effect.

However, we still have concerns about the treatment of the large Brunner Island power plant in the RACT proposal. Brunner Island is the only large coal-fired power plant without SCR or any other post-combustion NO_x controls in the state. As such, it is the only plant that is not subject to the stricter NO_x emissions limits to which its peers would be subject. At your May meeting, several members of the CAC questioned whether it is appropriate to define a pollution source category by the presence or absence of post-combustion controls. We believe that it is not. To define a source category in that way is to essentially say that a pollution control is only “reasonably available” if it exists already at a plant. This is not the intention of RACT, and in fact sets a bad precedent for future RACT determinations in Pennsylvania and in other upwind states that impact our air.

We understand that RACT must account for cost-effectiveness, and the argument has been made that SCR installation would not be cost-effective at Brunner Island.

Given the fact that all six other conventional coal-fired boilers have installed the technology, this is questionable. But even if the plant's operators could make this case, SCR is only one method it has at its disposal to reduce NOx emissions. Independent of RACT, it is currently installing gas-firing capability so it will soon have an alternative with no added capital cost by which it can meet a lower rate. However, there is currently no permit condition that limits coal firing after this conversion occurs.

And this one power plant, because its NOx is uncontrolled, has an outsized impact on ozone pollution in the region, which we highlighted in a modeling report this summer. In 2011 the plant contributed as much as 10 ppb of ozone to a monitor in York County, and made a significant contribution to ozone, as defined by EPA, at Pennsylvania monitors on 100 out of 152 days in the 2011 ozone season.

Therefore, I respectfully request the CAC to recommend that Brunner Island be held to the same standard as its peer power plants that have SCR installed, as meeting that limit is within its reach. If the plant owner disagrees, it can still file for a source-specific RACT determination, but would have to prove its case rather than getting a presumptive break. We do not believe that such a change should prevent the rule from being approved by the EQB in October.

Thank you again for your time.