

Oral Comments of Amelia Shenstone for Southern Alliance for Clean Energy regarding Plant Washington, 112(g) Case-by-Case Maximum Achievable Control Technology (MACT) Determination Construction Permit No. 4911-303- 0051-P-01-1.

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My name is Amelia Shenstone, and I am with the Southern Alliance for Clean Energy. We're a regional clean energy advocacy group with extensive experience advising utilities and public service commissions to promote smart energy choices throughout the Southeast. I'm delivering these comments on behalf of our Georgia members.

I'm here to express our grave concerns about Georgia EPD's reissued air permit for Plant Washington. This permit is inadequate to protect the health of Georgia citizens, particularly those living near the plant who use river resources for drinking and fishing. While we are pleased for the most part that EPD considered proposed new standards set forth by EPA in setting a limit for particulate matter, we are disappointed that the same rule was not applied to mercury and hydrochloric acid emissions. Judge Walker did not require such consideration, but she did not preclude it. EPD has a responsibility to protect Georgia's families from all air toxins; in order to prevent unreasonable and unnecessary levels of mercury and hydrochloric acid pollution, EPD should reject this permit until it is consistent with EPA's proposed rules.

Existing coal plants already emit enough mercury to make Georgia's fish too toxic to eat in many of our rivers, lakes, and streams. EPA estimates that as a young woman, if I were to have a child, there is a one in six chance that he or she would be exposed to toxic levels of mercury from my body that could cause mental retardation, reduced intelligence, and attention deficit/hyperactivity disorder. I don't want that risk for myself or any other young woman, or any family. EPD ought to be working to reduce current levels of mercury pollution and ensuring that any new sources be held to the strictest of standards. There is no excuse: better control technologies are available and the standards to drive their use should be required for Plant Washington.

EPA's recently proposed and soon to be enacted Maximum Achievable Control Technology, or "MACT," standard would ensure that a plant like this one employs the most effective pollution control devices. Unfortunately, this draft permit does *not* reflect the maximum achievable control technology standard proposed by EPA.

EPA reports that the cleanest comparable source of mercury in the country emits 99.5% less than Plant Washington would under this proposed permit. That's .28lbs/year, compared to Plant Washington's 55.6 lbs/year. And this "cleanest comparable source" is not an outlier; in fact, there are 117 other coal-fired units around the country that emit less mercury.

EPA has taken more than a decade to determine a reasonable and achievable limit and is poised to enact the MACT rule by November 2011. If you do not require this permit to meet the proposed tighter standard, the plant will likely face a costly trip back to the drawing board in the near future to cut 97% of mercury emissions. Why should Georgia wait for the federal government to make it do its job?

The proposed EPA MACT rule could also require Plant Washington to lower its hydrochloric acid emissions by upwards of 97.5%. EPA says Hydrochloric acid is associated with chronic respiratory toxicity.... Among other things, it is corrosive to mucous membranes and can cause damage to eyes, nose, throat, and the upper respiratory tract as well as pulmonary edema, bronchitis, gastritis, and dermatitis. HCl also contributes to acid rain.

Again, we *can* do better and EPD should ensure that we *do*. There are at least 99 comparably-sized plants nationwide that emit less HCl than Plant Washington would. One of them is Georgia's own Plant Hammond, which was built in the '50s and '70s. Hammond also emits less mercury.

Southern Alliance for Clean Energy urges EPD to move Georgia forward by ensuring facilities meet the strongest of air quality standards, not backward by allowing the status quo of dirty coal to pollute our air and water. We urge plant developers to re-evaluate whether they have exhausted all alternatives from energy efficiency and cleaner energy sources, such as renewables and natural gas. If they still feel that a new generation facility is required, it *must* meet emissions standards associated with the maximum achievable control technology. This permit for Plant Washington does not meet those standards, and will allow unnecessary pollution to the detriment of Georgia citizens. We urge EPD to reject the air permit as written and take appropriate action to truly protect our health.

Thank you.