

## Summary of Workgroup Requests Regarding IPM Modeling

EPA ASSUMPTION	WORKGROUP REQUEST	PAGE REFERENCE
<b>REQUESTS FOR CLARIFICATION</b>		
Reduction in coal-fired generation is inversely proportional to stringency of mercury standard	Clarification of this result and the aspects of the modeling that brought it about	1, 7
Constraints on availability of ACI and activated carbon by 2008	Clarification of whether the modeling imposed any such constraints	1, 8
Baseline from which emissions reductions are considered	Clarification as to whether this baseline is uncontrolled emissions or current emissions considering the mercury reduction cobenefits of existing controls	2, 8
Numerical correlation between modeled emission rates and percentage emission reductions	Clarification as to how emissions rates correlate with percentage reductions in EPA's modeling of high, medium and low cases	2, 9
<b>REQUESTS FOR MODIFICATION</b>		
95% mercury control level for the combination of SCR and FGD	Available data indicate that 95% level is highly optimistic. EPA should limit removal efficiency at most to 80%, and only for bituminous coals.	2, 9
90% mercury control level for the combination of SNCR and FGD	Available data indicate that SNCR does not enhance mercury removal. SNCR/FGD should be eliminated as a control option	3, 12
80% removal for bituminous pulverized coal units with Cold Side ESP and FGD	EPRI data indicate removals of between 52% and 72%, so that 60% would be a more reasonable removal estimate	4, 14
80% removal across the board for ACI	Fabric filter with ACI can achieve 80%, but ESP with ACI cannot exceed 65%. We request the replacement of single control level with two control options that reflect this difference	4, 16
Average capital cost of ACI is approximately \$15/kW	Cost should be higher due to necessary upgrades to fabric filters / ESPs and contamination of coal combustion byproducts	5, 19
Use of ACI would not affect marketability of coal combustion byproducts	Use of ACI would result in mixing of carbon with ash and gypsum, turning them from marketable products to waste requiring disposal. EPA should incorporate lost revenue and disposal cost into IPM modeling assumptions	5, 20
<b>REQUEST FOR SHORT-TERM MODEL RUNS AND ACCESS TO IPM OUTPUTS</b>		
IPM model runs are at 5-year intervals	Request that EPA explicitly model the 2008 compliance year in addition to years 2005 and 2010	6, 21
N/A	Request that EPA provide certain input assumptions and output data	6, 22
Forthcoming ambient air modeling for mercury	Request for opportunity to participate in development of EPA's mercury air modeling	6, 24