

Comments on Georgia Clean Air Mercury Rule –Proposed options February 2006
EPA Region 4

Option 1

- Georgia should use (e.g., by incorporating by reference) the definition for “electric generating unit” or “EGU” in §60.24(h)(7) and separately define “existing” and “new” , with regard to an EGU, based on the date of commencement of operation.

- Georgia intends to establish annual statewide mercury mass emission limits during each phase equivalent to either 80, 85 or 90% capture efficiency (which limits cannot exceed the State’s budget under CAMR) and then apportion shares of the statewide limit to EGUs based on their recent generation. Georgia needs to consider how mass emission limits will be established for “new” units during their first few years of operation.

- With regard to the use of a Compliance Supplement Pool, the CSP should be created using a portion of the State’s 2010 budget under CAMR, and the CSP plus the State’s 2010 statewide mercury mass emission limit apportioned to EGUs cannot exceed 1.227 tons.

- In the sentences on page 3 that describe the Backstop Limit for Phase I and the Backstop Limit for Phase II, EPA suggests that Georgia consider replacing the word “rate” with the word “limits” when referring to mercury mass emissions.