



Southern Alliance for
Clean Energy
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Capp

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AIR PROTECTION BRANCH

Mr. Jac Capp
Program Manager
Stationary Source Permitting Program
Air Protection Branch
Georgia Environmental Protection Division
Atlanta Tradeport
4244 International Parkway, Suite 120
Atlanta, GA 30354

Re: Comments to the Georgia Air Protection Branch on Power4Georgians Prevention of Significant Deterioration Air Permit Application; No. 17924

Dear Mr. Capp,

Please receive these comments from the Southern Alliance for Clean Energy as expression of the serious concerns we have with the proposal from Power4Georgians, LLC to build an 850MW supercritical pulverized coal plant in Washington County, Georgia.

The state of Georgia Air Protection Branch of Environmental Protection Division has an obligation and moral responsibility to guide potential sources of air pollution toward the cleanest and safest route to protect human health and the environment. Global warming is by far one of the most serious issues facing mankind today. For EPD to move forward on this permit without fully considering the consequences of additional carbon dioxide emissions from Georgia would be irresponsible, counter-productive, and dangerous to our environment, air quality and economy. Georgia EPD is also bound by law under the Clean Air Act to require the Maximum Available Control Technology for hazardous air pollutants, to require the Best Available Control Technology for other pollutants subject to regulation under the Act, and to conduct modeling for actual air emissions from new facilities.

The uncontrolled carbon dioxide emissions that Plant Washington would emit fly in the face of some of our neighboring states' diligent efforts to significantly curb global warming emissions and similar initiatives by some of Georgia's cities that have stepped up to sign the US Mayors Climate Action Agreements. While many other state environmental regulatory offices are working hard to understand and propose solutions to their state's existing contributions to global warming pollution, it would be disingenuous for the Georgia EPD to allow for an air permit application such as for Plant Washington to move forward. Adding new pulverized coal plants before establishing a comprehensive framework upon which Georgia can move forward would lock the state and affected Georgia EMC ratepayers into unnecessary future carbon risks.

Momentum is gaining rapidly on Capitol Hill to embrace a global warming bill that would set limits on carbon dioxide emissions and create a carbon marketplace. Support for a carbon cap on emissions is growing, with proponents on both sides of the aisle representing many diverse

constituencies. We are likely to see significant movement, if not passage, of a global warming bill in the 110th Congress in 2008.

The recent Supreme Court ruling on global warming pollution, recent actions of permitting agencies with similar permit requests in other states, and the current momentum in Congress to adopt federal carbon regulation are clear signals that we need to create plans immediately to significantly reduce our global warming pollution and not add more sources before we know the extent of future regulation. EPD would be wise to fully weigh the risks to the state of allowing more carbon dioxide sources on-line. We urge EPD not to consider approving any new air permits that would generate significant new carbon dioxide emissions, especially on the scale of proposed Plant Washington, until the state has a carbon-contingency and control plan. Controlling CO₂ from a pulverized coal facility is a cost-prohibitive and energy intensive process, making it a nearly non-existent possibility.¹ EPD must be strategic in foreseeing the future of air pollution requirements and planning for carbon regulation.

Carbon Risk

Based on the knowledge that Georgia may very well be dealing with federal regulations on carbon dioxide in the near future, allowing new sources of pollution to come on-line now is irresponsible and harmful to Georgia EMC ratepayers. Carbon dioxide is retained for over 100 years in the atmosphere, so this facility's impact to global warming, if constructed, will continue to harm and warm the planet into the year 2110 and beyond. The longevity of the impacts of CO₂ in the atmosphere demand more significant consideration than typical criteria air pollutants.

As carbon regulations solidify, the Georgia EMCs and the state of Georgia will inevitably need to figure out how to reduce the pollution from the existing coal facilities or take them offline. Power4Georgians may be hoping a new proposed facility in Washington County and any existing coal facilities could get grandfathered into new regulations and avoid compliance requirements, but this is an irresponsible and careless step to the detriment of all Georgians facing the risks of global warming impacts.

Best Available Control Technology

Under the Clean Air Act, the state may only issue an air permit that requires Power4Georgians to build a plant that employs Best Available Control Technology (BACT). BACT requires an emission limitation based on the maximum degree of reduction of each pollutant subject to regulation under the Clean Air Act emitted from a major emitting facility. The supercritical pulverized coal facility proposed by Power4Georgians does not employ BACT. The proposed facility does not maximize emission reductions for the criteria air pollutants. Carbon dioxide, the chief global warming pollutant, should be regulated under BACT.

A representative of Southern Alliance for Clean Energy participated in a Power4Georgians event on January 22, 2008 where proponents of the facility claimed that Plant Washington would be using the most modern air pollution controls and that this plant is the cleanest option, but evidence demonstrates that this is not true. *There is gasification technology on the market that would more effectively capture all emissions.* Gasification would ensure that we have options for

¹ DOE/NETL. "Chilled Ammonia-based Wet Scrubbing for Post-Combustion CO₂ Capture". February 2007.

the near future to capture and sequester the millions of tons of CO₂ emissions expected on an annual basis from the facility. Carbon capture technologies are an essential component to any baseload coal facility, if indeed a coal plant has to be built at all.

We also request that EPD do a MACT analysis for controlling mercury emissions because Power4Georgians' current plan for addressing the emission of this neurotoxin does not ensure that the maximum available control technology is being used.

In closing, the Georgia EPD has an opportunity to guide the state toward leadership in creating a clean energy future by protecting air quality in the most sophisticated and forward looking manner. Full considerations of the impacts of the air pollutant carbon dioxide and maximum controls for nitrogen oxide, sulfur dioxide, and mercury must be the first and foremost concern. Right now the 10 Georgia EMCs standing behind the Power4Georgians' Plant Washington coal proposal are *not* being leaders by proposing a facility that uses old technology and perpetuates a dependency on the dirtiest form of air pollution known to man. When we have solar panels, wind turbines, efficient home designs, energy efficient building materials, high efficiency appliances, and a plethora of alternatives, dirty pulverized coal is a shameful choice. We formally request that Georgia EPD deny Power4Georgians' application for an air permit in favor of other global warming solutions thus leading Georgia into a clean energy future.

We support the various legal concerns raised by both Southern Environmental Law Center and Greenlaw in the comments that we understand they intend to file regarding the Power4Georgians' air permit application.

We formally request direct notification of any related decisions on the application for air permit.

Respectfully Submitted,



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