

1 **Q. In Ms. Hoag's testimony, she expresses concern that "nearly 3 tons per day" of**
2 **"criteria and toxic pollutants" will be emitted from the proposed power plant.**
3 **Are her concerns well founded?**
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7 A. Air emission rates are presented in Tables 6.1-2, 6.1-4, and 6.1-5 of the Application.
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9 When firing gas, the plant would emit approximately ~~0.8~~ 1.7 tons of criteria pollutants
10 and ~~0.4~~ 0.8 tons of toxic air pollutants per day. When firing oil, the plant would emit
11 approximately ~~3.2~~ 6.4 tons of criteria pollutants and ~~0.5~~ 1.1 tons of toxic air
12 pollutants per day. Over the course of the year, the plant would emit an average of
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14 1.9 tons per day of criteria pollutants and 0.8 tons per day of toxic air pollutants.
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16 Ammonia slip from Selective Catalytic Reduction (SCR, the equipment employed to
17 reduce oxides of nitrogen) accounts for 93 percent of the toxic air pollutants on an
18 annual basis. While it is considered a toxic air pollutant in Washington, it is not
19 considered a hazardous air pollutant by federal law.
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29 I believe the more relevant consideration is the environmental and health implications
30 of those emissions. Because S2GF is a significant source of air emissions, its
31 permitting process appropriately required a very extensive air quality analysis. That
32 analysis demonstrated that the predicted concentrations are far below the standards
33 established in the United States to protect human health and welfare (Application
34 Tables 6.1-13, 6.1-14, 6.1-20). Furthermore, the incremental contribution to air
35 pollution in both Class I and Class II areas was far below the increments established
36 by EPA's PSD permitting process to prevent significant deterioration of air quality
37 (Tables 6.1-17, 6.1-18). We believe the testimony of Axel Franzmann, Air Quality
38 Control Specialist with the Northwest Air Pollution Authority, for Whatcom County is
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