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## ACSF Calls on EPA to Facilitate MACT Rule Compliance By Emphasizing Fuel Switching

Washington, D.C. -- The American Clean Skies Foundation, a Washington, D.C. non-profit, filed comments today urging the U.S. Environmental Protection Agency to fully recognize that substituting clean-burning natural gas generation for out-of-compliance coal plants can help power companies reduce harmful pollution.

ACSF submitted the comments as part of the EPA's proposed rulemaking on new "maximum achievable control technology" (MACT) standards for electric power plants. ACSF supports the power plant MACT rules as a means to improve public health by reducing large amounts of toxic air pollution.

In its comments, ACSF asked EPA to provide power companies detailed guidance regarding how compliance with the MACT standards can be achieved by switching fuels used for electric generation from coal to natural gas. Compliance through fuel-switching could be achieved by:

- (1) converting existing coal boilers to use natural gas,
- (2) retiring coal plants and building new natural gas generation (either at the same location or a new location),
- (3) increased co-firing with natural gas, and
- (4) simply increasing the use of existing, underutilized natural gas power plants.

The increased use of natural gas allows for the orderly retirement of aging, high-emitting coal plants rather than pursuing costly retrofits to comply with MACT standards. Renewable energy can also provide replacement power, but it needs back-up generation to provide power when intermittent renewable resources aren't producing electricity, again a role that natural gas plays more efficiently than coal.

As part of its MACT analysis, EPA incorrectly stated that using natural gas is more expensive than retrofitting coal plants. ACSF studies show that is not the case and that using existing gas plants is less expensive than retrofitting coal plants. Moreover, building new natural gas plants can cost roughly the same as coal-plant retrofits while lowering emissions. Finally, ACSF pointed out that the EPA analysis did

not adequately consider the recent discovery of vast natural gas supplies and the resulting promise of stable natural gas prices and expanded natural gas availability.

Extending the lives of out-of-compliance coal plants is a short-term fix and does not sufficiently address health costs resulting from coal-fired generation. The proposed rule notes that power plants “are by far the largest U.S. anthropogenic sources” of mercury emissions—a key pollutant targeted by the MACT rule—and almost all of these mercury emissions are from coal-fired power plants. In contrast, natural gas-fired power plants emit no mercury and negligible amounts of the other hazardous air pollutants targeted for reductions from the power sector.

Gregory C. Staple, the CEO of the American Clean Skies Foundation, said that “it has been 20 years since the 1990 Clean Air Act amendments squarely put toxic air emissions from power plants on the regulatory agenda, and EPA should not delay in controlling these harmful emissions. Fortunately, natural gas provides a solution to lowering power plant emissions while providing reliable, affordable power.”

The complete text of the ACSF’s comments is available at [http://is.gd/mact\\_report](http://is.gd/mact_report) .