

Summary of EPA's Mercury Air Emissions Sub-Group Meeting, April 26, 2010

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The discussion centered on the best ways to achieve mercury reductions from domestic and foreign mercury producers, in the context of an international protocol or treaty, (e.g. Stockholm protocol). Such a protocol would have two different mechanisms for reducing mercury emissions:

1. Action Plan - focuses on air programs
2. Implementation Plan - focuses on everything but air programs

Note: There are different requirements under the Stockholm treaty for both.

Both mechanisms are not a means to an end; rather, they are the mechanism used to determine the best methods for reducing mercury emissions. There was some discussion on what can be incorporated into and the difference between each type of plan.

The discussion then focused on the requirements to implement a plan. Since developing a plan requires effort and resources, should everyone (other countries) develop an action plan, regardless of mercury emission? Should a plan be triggered by a certain level of mercury emissions or type of process? These issues were discussed, but no resolution reached.

Additional issues identified:

1. How to establish and the reliability of baseline mercury emissions
2. How ongoing rulemaking (including pending utility rulemaking) would affect compliance options
3. Lack of global information as to mercury emissions concentration by location

Next, the group discussed the type of performance goals that should be specified in the protocol. Should the performance goal be established as a percent reduction from baseline mercury emissions, or implementing specific technologies? The benefits and drawbacks of each were analyzed, with no resolution reached.

With either goal, new technologies will be required to reduce mercury emissions. How should these technologies be addressed in the protocol? Generally, best available technologies (BAT) are specified so that countries have a set of instructions and measurable, effective means for reducing mercury emissions. This part of the discussion centered on implementing BAT. Apparently, achieving international consensus on BAT is difficult, and, when it occurs, the BAT selected is the simplest / least reduction. This also has the drawback of stifling innovation, as the methods to reduce emissions are prescribed, rather than allowing countries to develop their own. Also, the effectiveness of an implemented BAT can vary wildly between nations. Without specifying BAT, however, some entities would have an increased difficulty in reducing emissions.

The final discussion included possible BAT for different industrial sectors, along with the most effective use of money to assist Entities in reducing mercury emissions.

There will be a brief interagency meeting on Thursday regarding this topic, with a goal of publishing a draft protocol in the middle of May.

