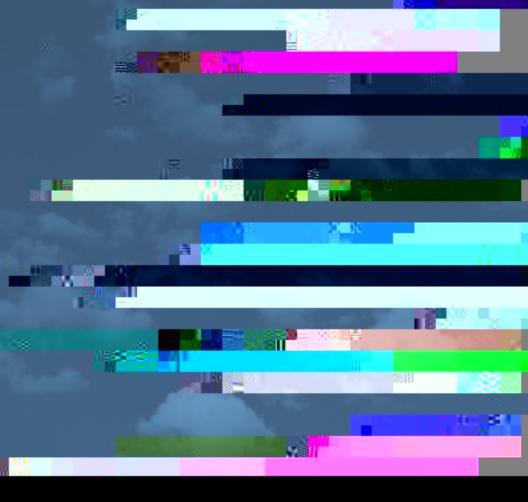
# AIR POLLUTION FROM AMERICA'S POWER PLANTIS

## **THE FACTS**





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#### I THE ELECTRIC UTILITY INDUSTRY AT A CROSSROADS

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#### **II POLICIES AND PROPOSALS**

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#### III POWER PLANT CLEANUP: MYTHS AND FACTS

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#### IV HEALTH AND ENVIRONMENTAL IMPACTS

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## THE ELECTRIC UTILITY INDUSTRY AT A CROSSROADS

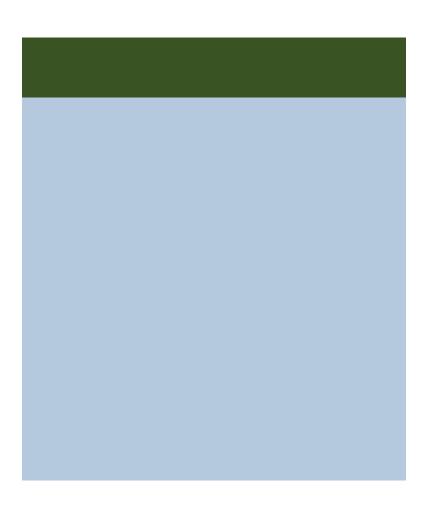




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U.S. Department of Energy, "Scenarios for a Clean Energy Future," November, 2000, p. 7.2 
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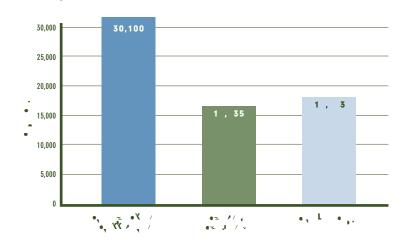
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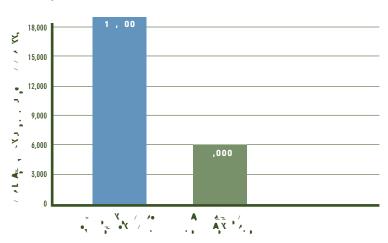
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THE ELECTRIC UTILITY INDUSTRY AT A CROSSROADS



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- <sup>1</sup> White House National Energy Policy Development Group, *Reliable, Affordable and Environmentally Sound Energy for America's Future*, May 2001, "Overview," p. xi; http://www.whitehouse.gov/energy/Overview.pdf.
- <sup>2</sup> Harlan Byrne, "Too Much Power? The Utility Industry's in a Building Boom. Why Skeptics Fear a Bust," *Barron's*, August 6, 2001.
- <sup>3</sup> According to U.S. EPA, moderate to advanced utilization of energy efficiency measures will reduce electricity demand by between 8% and 24% from a "business as usual" scenario. U.S. EPA, *Economic Analysis of a Multi-Emissions Strategy* (preparhPR.6aC[ahefficiency measures





## POLICIES AND PROPOSALS





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Two Southeastern Massachusetts Power Plants. <sup>2</sup>	159	124

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Governor George W. Bush, "A Comprehensive National Energy Policy," September 29, 2000

POLICIES AND PROPOSALS

## ELECTRIC INDUSTRY EXECUTIVES RECOGNIZE THE VALUE OF CLEANING UP ALL MAJOR POLLUTANTS IN ONE COM-PREHENSIVE PLAN

"A piecemeal pollutant-by-pollutant approach to emissions reductions is costly and inefficient.... In comparison, an integrated strategy would allow electricity generators to optimize their pollution control decisions."

The Clean Energy Group<sup>32</sup>

"It makes good business sense to know what our CO<sub>2</sub> control obligations might be for a period of time so that we can factor that into our decisions when we comply with the other emissions reductions.... If we know the whole package, including CO<sub>2</sub>, we'd probably make a decision to retire more plants."

Dale Heydlauff, Senior Vice President for Environmental Affairs, American Electric Power<sup>33</sup>

"Our proposal calls for mandatory, nation-wide emissions caps for nitrogen oxide, sulfur dioxide, mercury and <u>carbon dioxide</u> [emphasis added]; established dates certain for producing necessary emissions reductions; [and] implementation through emissions banking and trading...."

Frank Cassidy, President, PSEG Power, LLC<sup>34</sup>

"The fragmented regulatory framework which now applies to electric power plants emissions is blocking progress toward our long-term energy and environmental goals. There is need for a coordinated multi-pollutant framework for power plant emissions...."

James E. Rogers, Vice Chairman, President, and CEO,

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"Jeffords to Tackle Global Warming," The Associated Press, July 10, 2001. "Vermont Sen. James Jeffords named global warming as his first priority when he formally became chairman of the Senate Environment and Public Works Committee on Tuesday."

"Byrd Proposal to Create Office for Climate Control Approved" *Charles on Gq e e*, August 3, 2001. "A key Senate committee has given unanimous approval to climate control legislation authored by Sen. Robert Byrd."

"Lieberman, McCain Announce Intent to Draft Legislation Creating Cap-and-Trade System," Bureau of National Affairs, *Dail. En ironmen Repor*, August 6, 2001. "Two key senators announced Aug. 3 their intent to draft legislation to cap emissions of greenhouse gases and to put in place an allowance trading system they say will encourage innovative technologies for reducing emissions of the gases believed to cause global warming."

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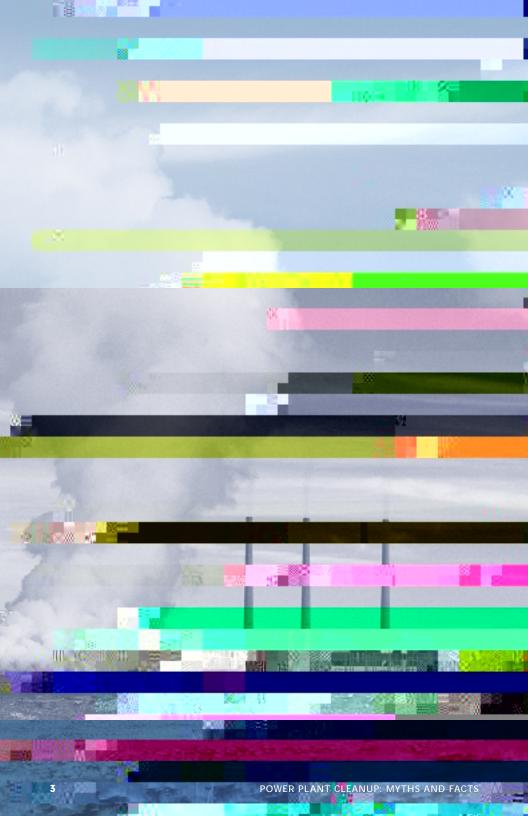


- <sup>17</sup> Tripp Baltz, "New Source Review Must Be Eliminated in Any Trading Bill, Air Chief Says," BNA *Daily Environment Report*, March 18, 2002.
- <sup>18</sup> The White House, "Executive Summary," *The Clear Skies Initiative*, February 14, 2002; http://www.whitehouse.gov/news/releases/2002/02/clearskies.html.
- <sup>19</sup> Triipp Baltz, op cit.
- <sup>20</sup> Alex Canizares, "Cinergy, Southern to Gain From Clean-Air Law Changes," *Bloomberg News*, January 2, 2002. Article based on interview of EPA official William Harnett.
- 21 Ibid.
- <sup>22</sup> A summary of compliance strategies implemented by the 443 coal-fired units regulated under Phase I of the acid rain program is as follows: fuel switching: 162 (37%); purchasing pollution allowances from other units: 39 (9%); installing emissions controls (fuel gas de-sulfurization): 27 (6%); using previously installed controls: 25 (6%); retiring facilities: 7 (2%); boiler re-powering: 1 (< 1%); substituting and compensating units: 182 (41%). Source: U.S. Department of Energy, Energy Information Administration, Form EIA-767; http://www.eia.doe.gov/cneaf/electricity/page/eia767.html.

23 Clean Air Act,

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(a) Clean Energy Group companies are: Conectiv, Consolidated Edison, Inc., Entergy Corp., Exelon Power Corp., KeySpan, Northeast Utilities, Ontario Power Generation, Inc.,





### POWER PLANT CLEANUP: MYTHS AND FACTS

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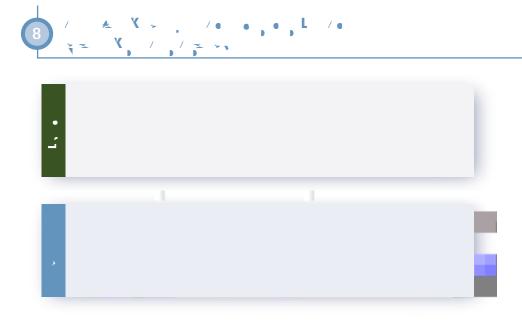
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Clean Air Act (existing programs) <sup>1</sup>	1.25 million ton cap by 2010 <sup>2</sup>	2 million ton cap by 2012	Maximum emis- sion of 5 tons per year by 2008 <sup>4</sup>	
Bush "Clear Skies" Plan (two-step approach) <sup>5</sup>	2.1 million ton cap by 2008 1.7 million ton cap by 2018	4.5 million ton cap by 2010 3 million ton cap by 2018	Maximum emis- sion of 26 tons per year by 2010 Maximum emis- sion of 15 tons per year by 2018	No Limit
Increase allowed by Bush plan over Clean Air Act existing programs (by 2018)°	450,000 tons more NO <sub>x</sub>	1 million tons more SO2	10 tons more Hg	No Limit
% increase allowed by Bush plan over Clean Air Act existing programs (by 2018)	36% more NOx	50% more SO₂	200% more Hg	No Limit
Delay allowed by Bush plan over Clean Air Act existing programs	8-year delay	6-year delay	10-year delay	

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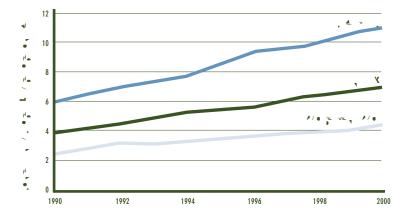
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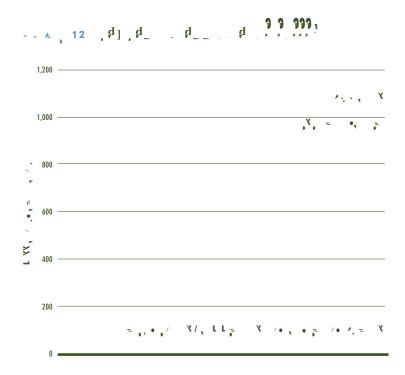
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POWER PLANT CLEANUP: MYTHS AND FACTS

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POWER PLANT CLEANUP: MYTHS AND FACTS

- 7 U.S. EPA, *Economic Analysis of a Multi-Emissions Strategy*, prepared for Senators James M. Jeffords and Joseph I. Lieberman, October 31, 2001, p. 27; http://www.epa.gov/air/jeffordslieberm.pdf. The reduction target analyzed by EPA was 58 million metric tons of carbon by 2020.
- <sup>8</sup> U.S. Department of Energy,

- <sup>20</sup> National Environmental Trust, *Powering the Future: Clean Energy for a Clean Environment*, 1997. This report uses U.S. EPA and U.S. DOE data to calculate emission rates for power plants. The average emissions rates (lb CO<sub>2</sub>/Wh) vary tremendously for coal and for natural gas, as much as 40%. On average, coal-fired plants emit 2,300 lb/MWh, and natural gas-fired plants emit 1,300. Given the current amounts of generation from each fuel, a 5% increase in efficiency means 40 million metric tons of carbon equivalent (MMtC) not released into the atmosphere. This is approximately 10% of the U.S. reduction goal under the Kyoto Protocol. For a copy of this report, contact National Environmental Trust, 202-887-8800.
- <sup>21</sup> Coal-fired power plants are approximately 33% efficient, on average. This means that only 33% of the energy potentially obtained from burning the coal is actually converted to electricity. U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, Scenarios of U.S. Carbon Reductions: Potential Impacts of Energy Technologies by 2010 and Beyond (Report # ORNL/CON-444, Washington, DC, 1997), pp. 7.28-7.29.

22 Ibid.

<sup>23</sup> Capital improvements other than new construction typically require a two-year payback period before investment will occur. New Jersey Department of Environmental Protection, *Evaluation of the Effectiveness of Pollution Prevention Planning in New Jersey*, May 1996. Companies, however, capitalize new construction and new processes over 20 years or more. Many energy efficiency projects have paybacks longer than two years, especially if new equipment is involved. In general, companies choose to treat energy efficiency as any other capital investment, rather than giving it the status of a genuine process upgrade; consequently, it won't necessarily get done.

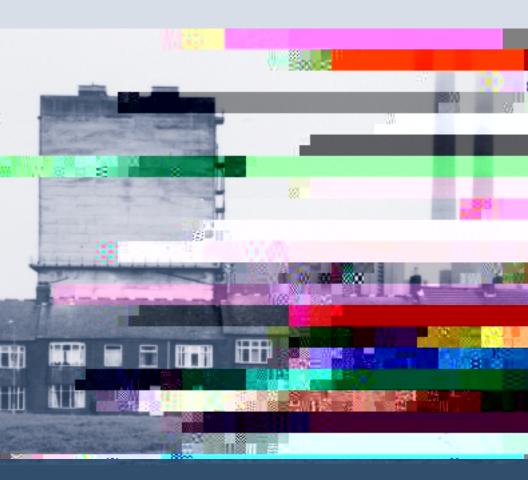
<sup>24</sup> For example, see F. Irwin et al., Tak:;D7Byte outs of Carbo: Elfecroni csInnovuationfor#



- <sup>32</sup> The Mellman Group, Inc., "Ohio 6th Congressional District Voter Attitudes Toward Clean Air Regulations," September 8, 1998. The Mellman Group designed and administered this survey conducted by professional interviewers. The survey interviewed 400 likely November 1998 voters in Ohio's 6th Congressional District. The survey was conducted between August 25 and 27, 1998. The margin of error is +/- 4.9 percentage points at the 95% confidence level. A copy can be obtained from National Environmental Trust, 202-887-8800.
- <sup>33</sup> Clean Air Task Force, Scraping the Bottom of the Barrel for Power: Why There Is No Need to Relax Clean Air Safeguards on Dirty Power Plants to "Keep the Lights On," November 8, 2001; http://cta.policy.net/relatives/18560.pdf. See Appendix A, "Electric Power New Capacity Additions Update," Erin O'Neill, The NorthBridge Group, October 31, 2001 ("U.S. Historic and Projected Capacity Additions"). New generation projections in this "Update" are based on a forecast prepared by The NorthBridge Group. Information on plants under construction or in the development process used to prepare this forecast comes from the October update of "NEWGen" database maintained by Resource Data International (RDI). The process for siting, permitting, and constructing a new power plant typically takes four to five years. The status of plants in the early stages of this process is less certain than those in advanced stages of development. Thus, new power plant development projections can only be made based on current market activity through about 2004-6.

34 Ibid.

35 Ibid.





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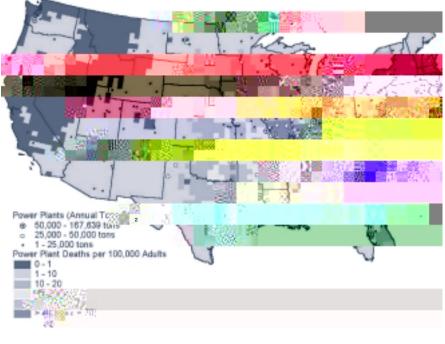
#### Air Pollution from Power Plants Harms Public Health

<u>Fine Particle Soot:</u> When power plants burn coal, they produce sulfur dioxide that forms fine particles that are extremely harmful to human health. These particles can be inhaled deeply into the lungs where they lodge, causing severe damage, including asthma attacks, respiratory illness, and premature death. Sulfur dioxide from power plants is the leading cause of fine particle soot in the eastern half of the U.S.<sup>6</sup>

<u>Ozone Smog:</u> Power plants produce nitrogen oxides that are transformed into ozone smog on hot summer days, resulting in "code red" conditions in cities and towns throughout the U.S. Ozone smog causes respiratory damage ranging from temporary discomfort to asthma attacks and long-term, permanent lung damage. Coal-burning power plants produce more nitrogen oxide pollution than any other industrial source.<sup>7</sup>

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#### WHAT IS ACID RAIN?

When sulfur dioxide and nitrogen oxides are released into the atmosphere, they form acids that return to earth in rainfall. "Acid rain" accumulates in lakes and seeps into soils, causing wide-ranging damage. In addition to killing many fish species and harming others, it contributes to death and disease among several species of trees. Power plants emit about 67% of all sulfur dioxide and 25% of all nitrogen oxides in the U.S., making them the single largest source of acid rain.<sup>12</sup>

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Acadia National Park (ME)	16 miles	87 miles	82%
Big Bend National Park (TX)	37 miles	118 miles	69%
Glacier National Park (MT)	29 miles	94 miles	69%
Grand Canyon National Park (AZ)	61 miles	145 miles	58%
Great Smoky Mountains Nat'l Park (TN/NC)	60 miles	12 miles	80%
Point Reyes Wilderness Area (CA)	15 miles	88 miles	83%
Shenandoah National Park (VA)	10 miles	54 miles	81%

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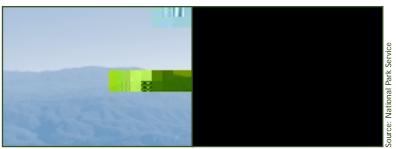
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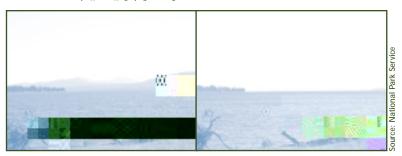
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#### The Intergovernmental Panel on Climate Change (IPCC),

established in 1988 by the United Nations, comprises 2,000 climate experts and scientists from around the world who are charged with assessing the technical issues of global warming and providing policy makers with guidance on mitigation options. Presidents Ronald Reagan and George H. W. Bush endorsed the formation of the IPCC to ensure thorough and fair review of emerging scientific findings on climate change. Building on past reports and incorporating the results of new research over the past five years, the IPCC's *Third Assessmen Repor*, issued in February 2001, is the most emphatic warning yet about the dangers of global warming. ngielein ng lie a nai ea e i en e a iegeg en e al acein i aciangea e

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### **CONCLUSION**

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- Abt Associates, The Particulate-Related Health Benefits of Reducing Power Plant Emissions, October 2000; http://www.clnatf.org/resources/reports/Abt\_PM\_report.pdf. Abt Associates is EPA's leading health-damage consultant, and conducted its analysis using the methodology approved by EPA's independent Science Advisory Board. For a quick reference to the key findings of the Abt Associates study, see Clear the Air, Death, Disease & Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants, October 2000, pp. 3 and 5; http://cta.policy.net/fact/mortality/mortality/lowres.pdf.
- <sup>2</sup> "Health Benefits of Emissions Reductions from Older Power Plants," *Risk in Perspective*, Vol. 9, Issue 2, Harvard Center for Risk Analysis, April 2001.
- <sup>3</sup> Abt Associates, The Particulate-Related Health Benefits of Reducing Power Plant Emissions, and Clear the Air, Death, Disease & Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants, p. 5.
- <sup>4</sup> Dr. John Peters (director), "Epidemiologic Investigation to Identify Chronic Health Effects of Ambient Air Pollutants in Southern California" (known as "The Children's Health Study"), February 2002; http://www.arb.ca.gov/research/chs/chs.htm.
- <sup>5</sup> U.S. Public Interest Research Group, *Danger in the Air: Unhealthy Smog Days in 2000* (January 2001), p. 7, Table 1, "Summary of 2000 Exceedances and Smog Days by State"; http://uspirg.org/reports/Dangerintheair2000.pdf.
- <sup>6</sup> U.S. EPA, National Air Pollutant Emissions Trends, 1900-1998, March 2000, Chapter 1.2, p. 1-2 and Figure 2-4, p. 2-12; http://www.epa.gov/ttn/chief/trends/trends98/trends98.pdf.
- <sup>7</sup> *Ibid.*, Chapter 1.2, p. 1-1 and Figure 2-2, p. 2-10.
- <sup>8</sup> Ohio Environmental Council, Ohio Valley Ozone Alley, February 2000; http://www.theoec.org/pubs\_airenerg.html.
- <sup>9</sup> J. I. Levy et al., "Using CALPUFF to evaluate the impacts of power plant emissions in Illinois: Model sensitivity and implications," *Atmospheric Environment*, 36 (6): 1063-1075 (2002); http://www.hsph.harvard.edu/press/releases/press1032001.html. Also J. I. Levy and J. D. Spengler, "Modeling the benefits of power plant emission controls in Massachusetts," *Journal of Air & Waste Management Association*, 52: (2002); http://www.hsph.harvard.edu/papers/plant.pdf.
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- <sup>11</sup> *Ibid*, p. 12.
- <sup>12</sup> U.S. EPA, *National Air Pollutant Emissions Trends, 1900-1998*, Figures 2-2 (p. 2-10) and 2-4, (p. 2-12).
- <sup>13</sup> The information in this section is derived from a report by the Clean Air Task Force, Unfinished Business: Why the Acid Rain Problem Is Not Solved, October 2001; http://www.clnatf.org/resources/reports/Acid\_Rain\_Report.pdf.
- <sup>14</sup> T. A. Haines *et al.*, "Intensive studies of stream fish populations in Maine," *Ecological Research Series*, U.S. EPA (1990).

- <sup>30</sup> Ibid., p. 11. To determine the total economic impact or damages resulting from electric power generation, Abt Associates estimated the value of visibility-related changes associated with eliminating power plant emissions entirely. In the study, the monetary values were estimated for two broad categories of visibility benefits: (1) changes in "residential" visibility-*i.e.*, the visibility and around the locations where people live; and (2) changes in "recreational" visibility at Class I areas-*i.e.*, visibility at specially designated national parks and wilderness areas. Based on the public's willingness to pay for visibly cleaner air where they live, the adverse impact of power plant emissions cost \$3.4 billion a year by Abt Associates' calculations. Similarly, the impact of power plant emissions on visibility in parks and wilderness areas was \$4.3 billion a year. Together, the impact of power plant emissions as measured by people's willingness to pay for visibly cleaner air where they live and in parks and wilderness areas totaled \$7.7 billion per year in the U.S.
- 31 Ibid.
- <sup>32</sup> U.S. EPA, Study of hazardous air pollutant emissions from electric utility steam generating units-final report to Congress, February 1998, "Executive Summary," p. ES-4; http://www.epa.gov/ttn/oarpg/t3/reports/utilexec.pdf.

33 Ibid.

- <sup>34</sup> U.S. EPA, *Toxic Release Inventory 1999:* "Executive Summary," p. E-2, Table E-1; http://www.epa.gov/tri/tridata/tri99/press/execsummary\_final.pdf.
- <sup>35</sup> U.S. EPA, *Mercury Study Report to Congress*, December 1997, Volume 2, p. ES-6, Table ES-3; http://www.epa.gov/ttn/oarpg/t3/reports/volume2.pdf.
- <sup>36</sup> U.S. EPA, *Mercury Update, Impact on Fish Advisories*, June 2001, p. 4; http://www.epa.gov/ost/fishadvice/mercupd.pdf.
- <sup>37</sup> U.S. EPA, *Mercury Study Report to Congress*, December 1997, Volume 7, Chapter 2.1, p. 2-1; http://www.epa.gov/ttn/oarpg/t3/reports/volume7.pdf.
- 38 Ibid., p. 2-2.
- <sup>39</sup> National Academy of Sciences, *Toxicological Effects of Methylmercury*, National Academy Press, Washington, DC, 2000, Chapter 5, "Health Effects of Methylmercury," pp. 191-211; http://books.nap.edu/books/0309071402/html/191.html#pagetop.
- <sup>40</sup> U.S. Centers for Disease Control and Prevention, "Blood and hair mercury levels in young children and women of childbearing age–United States," *Morbidity and Mortality Weekly Review*, March 2, 2001; http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5008a2.htm.
- <sup>41</sup> *Ibid.* Based on national census data, 10% of women of childbearing age who tested for

<sup>44</sup> Intergovernmental Panel on Climate Change, Working Group I, Summary for Policymakers, p. 2; http://www.ipcc.ch/pub/spm22-01.pdf.

45 Ibid., p. 7.

46 *Ibid.*, p. 16.

<sup>47</sup> Intergovernmental Panel on Climate Change, Working Group II, Summary for Policymakers, Climate Change 2001: Impacts, Adaptation and Vulnerability, p. 13; http://www.ipcc.ch/pub/wg2SPMfinal.pdf.

48 Ibid., p. 5.

49 Ibid., p. 9.

<sup>50</sup> *Ibid.*, p. 6.

<sup>51</sup> U.S. Global Change Research Program, Climate Change Impacts on the United States: The Potential Consequences of Climate Variability and Change, "Climate Change Impacts on the United States," (2001), p. 7; http://www.usgcrp.gov/usgcrp/Library/nationalassessment/1IntroA.pdf.

52 Ibid.

- 53 Ibid.
- 54 Ibid.
- 55 Ibid.
- 56 Ibid.
- <sup>57</sup> U.S. EPA, *Inventory of U.S. Gas Emissions and Sinks: 1990-1999*, April 2001, Chapter 2, p. 2; http://www.epa.gov/globalwarming/publications/emissions/us2001/energy.pdf.

