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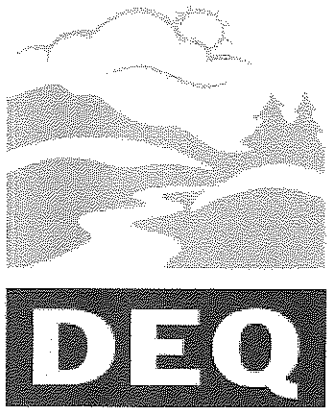
OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS 01/06/2009



State of Oregon
Department of Environmental Quality

Agenda

Oregon Environmental Quality Commission
Special Meeting
Tuesday, Jan. 6, 2009
Room EQC-A on the 10th floor of DEQ Headquarters
811 SW Sixth Avenue, Portland

Special meeting of the EQC with a public hearing on the proposed DEQ Regional Haze Plan

6:00 p.m.	**Welcome: EQC Vice Chair Ken Williamson**
6:05 p.m.	**DEQ staff presentation: Overview of DEQ's proposed Regional Haze Plan and rule for PGE's Boardman coal-fired power plant.**
6:30 p.m.	**Questions from the audience.**
7:00 p.m.	**Open public hearing: The EQC will take testimony from the audience. If you wish to provide testimony please fill out a speaker's request form and give it to the EQC Assistant.**
Adjourn:	**The meeting will adjourn when testimony is complete.**

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News Release

State of Oregon
Department of Environmental Quality

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For release: Dec. 24, 2008

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Oregon Environmental Quality Commission To Convene Tuesday, Jan. 6 in Special Meeting

Special meeting to be held with a public hearing on proposed rulemaking for the PGE Boardman coal-fired power plant and Regional Haze Plan.

What: The Oregon Environmental Quality Commission will meet in a special meeting on Tuesday, Jan. 6 and officiate a public hearing on proposed DEQ rules for the PGE coal-fired power plant located near Boardman, Oregon and the 2008 Oregon Regional Haze Plan.

The EQC is a five-member citizen panel appointed by the governor to serve as the policy and rule-making board for the Oregon Department of Environmental Quality.

When/ Where: **Tuesday, Jan. 6, 6 p.m.** The special meeting will take place in Room EQC-A on the 10th floor of DEQ Headquarters, 811 SW Sixth Ave. Portland.

Background: The EQC will hold a special meeting and officiate a public hearing on the DEQ Air Quality Division's proposed Regional Haze Plan. The plan includes proposed rules that would require the PGE Boardman coal-fired power plant to install stringent air pollution controls between 2011 and 2018. At this hearing, the commission will take public testimony, but will not make a decision about the proposed rulemaking. The EQC will consider the public testimony from this hearing and other hearings, as well as written testimony received by the public comment deadline, in making a decision about the proposed rulemaking. DEQ may modify its proposal based on public testimony and intends to present its recommendation for adoption of the Regional Haze Plan and PGE rule at the April 2009 EQC meeting.

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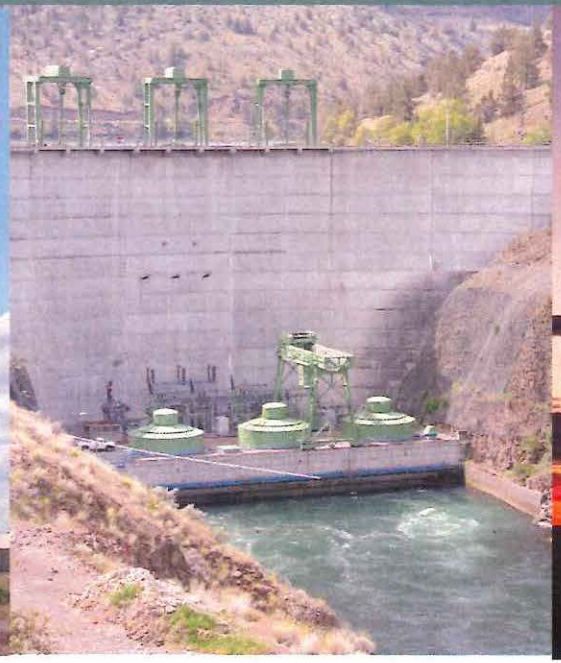
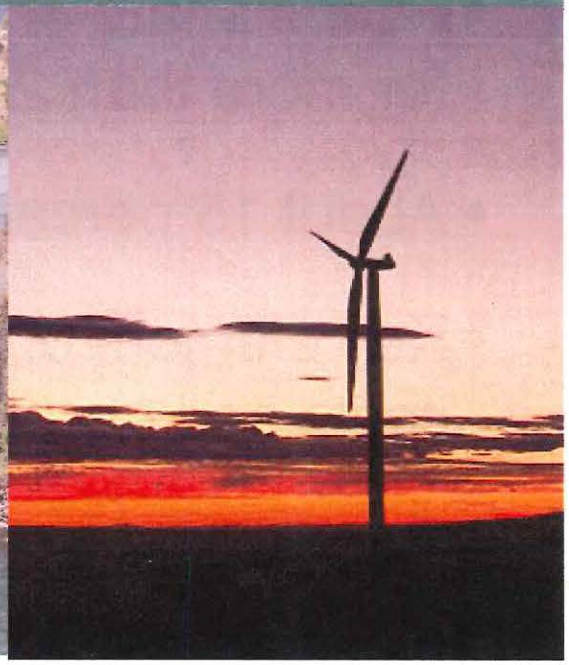
Oregon Regional Haze Plan

Boardman Power Plant





Portland General Electric

Boardman Plant Basics

- 585 Megawatts capacity. PGE owns 65 percent.
- PGE's share of the plant's output provides enough power for more than 250,000 homes.
- About 15 percent of PGE's resource mix.
- Key element of PGE resource diversity, helping to control costs and assure reliability.
- One-half to two-thirds cheaper to operate than natural gas.
- Low-cost, baseload resource that creates substantial value for our customers by lowering power costs and therefore prices.

Boardman Emissions Control Process

- DEQ/EPA rulemaking
- OPUC integrated resource planning process
- Engineering, procurement and construction
- OPUC ratemaking process

Factors Affecting Control Decisions

- Carbon regulation – state and federal
- Carbon capture & sequestration technology
- Alternative generation technologies
- Fuel diversity & costs – natural gas, coal
- SO_2 and NO_X control technologies
- Coordination of multiple schedules

PGE Comments to DEQ

- **PGE agrees with NO_X BART determination requiring substantial reductions by 2011**
  - Will result in nearly 6,000 tons NOx/year reduction
- **PGE agrees with SO_2 BART determination <u>if</u> plant operates through 2040 and beyond.**
  - BART determination based on years of operation
- **PGE has significant concerns regarding 2017 "Reasonable Progress" determination**
  - Major cost increase with minimal visibility benefit.

PGE Comments to DEQ

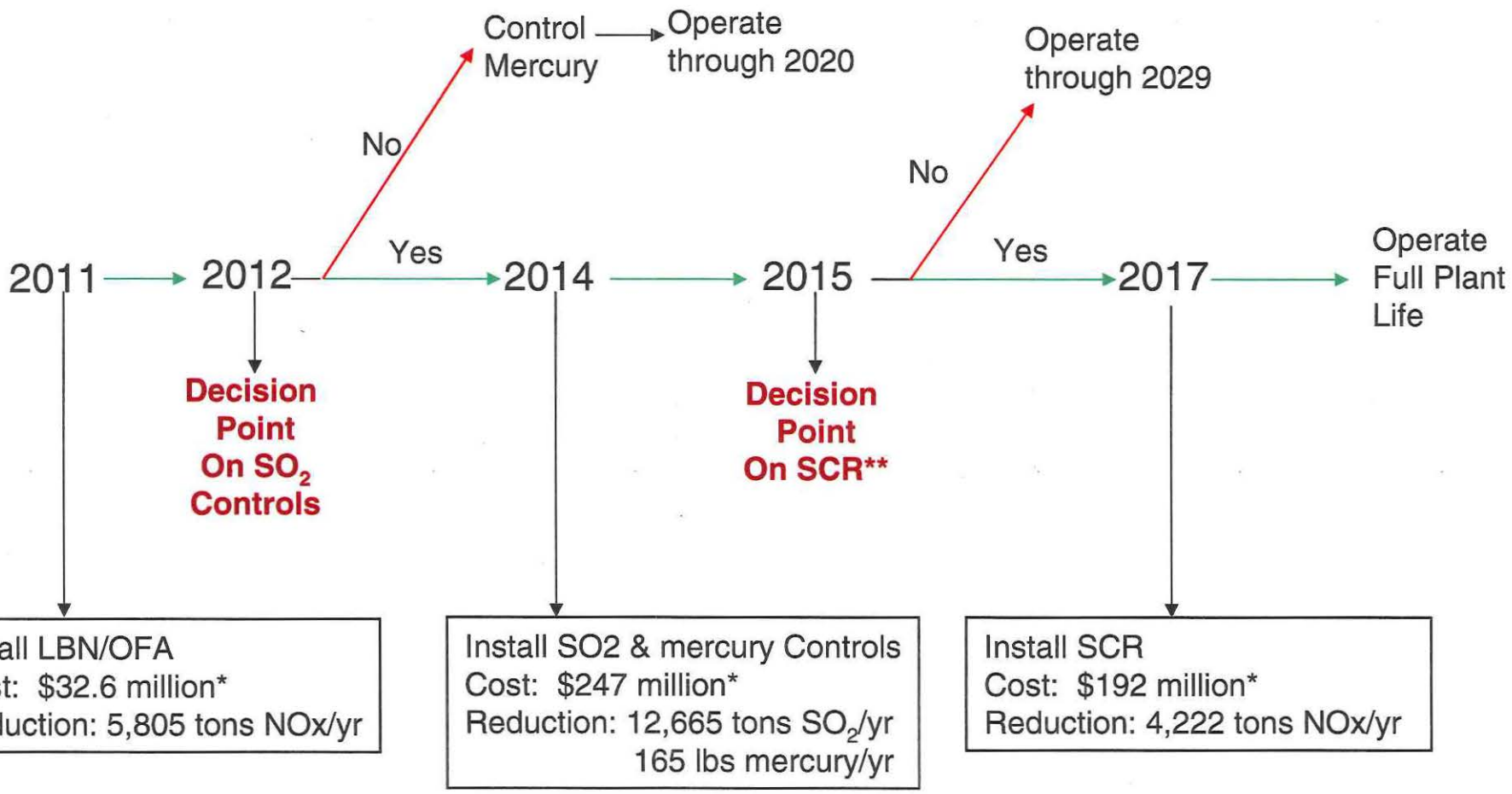
- **PGE requests alternative BART and Reasonable Progress determinations based on specific shutdown dates**
  - ➢ Each alternative meets BART and Reasonable Progress requirements
    - Life of plant is statutory criterion for BART and Reasonable Progress determinations
    - With shortened plant life, controls exceed cost-effectiveness range
  - ➢ PGE would have deadline ("Decision Point") for identifying BART and Reasonable Progress pathway
  - ➢ Decision Point implementation plan allows flexibility to achieve best economic and environmental outcomes for customers.
    - Recognizes current regulatory uncertainty

BART/Reasonable Progress Factors

- Clean Air Act Section 169A(g) specifies factors in making BART or Reasonable Progress determinations:
  - Energy impacts;
  - Non-air quality environmental impacts;
  - Costs of compliance;
  - Remaining useful life of plant; and
  - Visibility benefits.
- SO_2 scrubber meets all BART criteria *if* plant operates to 2040 and beyond.
- No additional SO_2 control meets all BART criteria *if* plant ceases operation by end of 2020.
- Phase 1 NOx and SO_2 controls meet all Reasonable Progress criteria *if* plant ceases operation by end of 2029.

Decision Point Proposal

PGE Alternative Boardman BART/Reasonable Progress Proposal



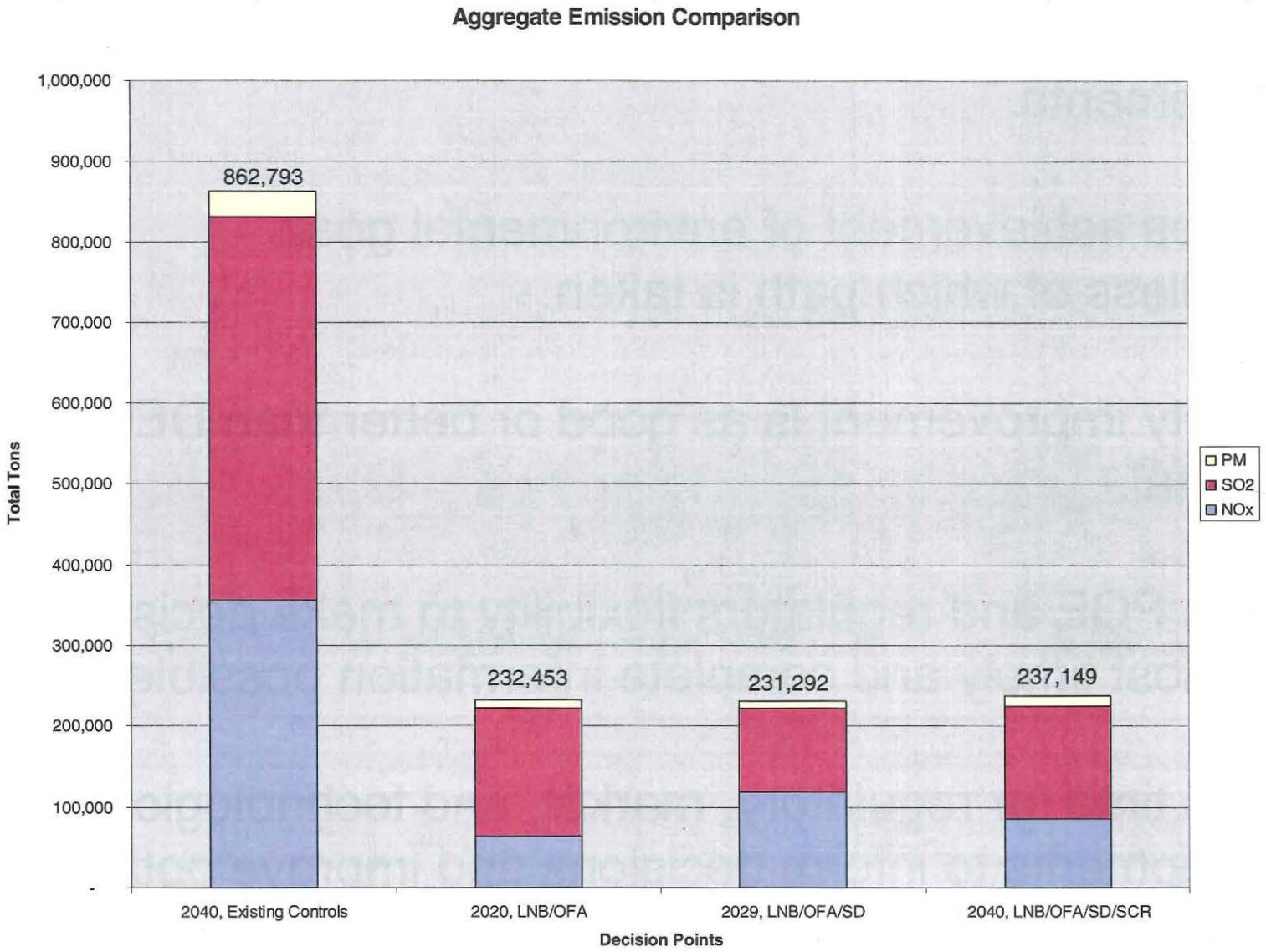
*Estimates are of 100% control cost in 2007 dollars

**Assumes that SCR is required under Reasonable Progress

Benefits of Decision Point Proposal

- Meets all BART and Reasonable Progress requirements.
- Assures achievement of environmental goals regardless of which path is taken.
- Visibility improvement is as good or better than DEQ's proposal.
- Allows PGE and regulators flexibility to make decisions with most timely and complete information possible.
- Allows time for regulatory, market, and technological developments to inform decisions and improve options.

No Aggregate Emissions Increase



Summary of PGE Comments to DEQ

- **Require NOx BART by 2011**
- **Establish two SO_2 BART determinations**
  1. SO_2 scrubber in 2014 and no plant closure requirement
  2. Closure by end of 2020 with no additional SO_2 controls
  - ➢ PGE required to submit permit application requesting closure no later than July 1, 2012 – otherwise SO_2 scrubber required in 2014
- **Establish two NOx Reasonable Progress determinations**
  1. SCR in 2017 and no plant closure requirement
  2. Closure by end of 2029 with no SCR
  - ➢ PGE required to submit permit application requesting closure no later than July 1, 2015 – otherwise SCR required in 2017

Attachments

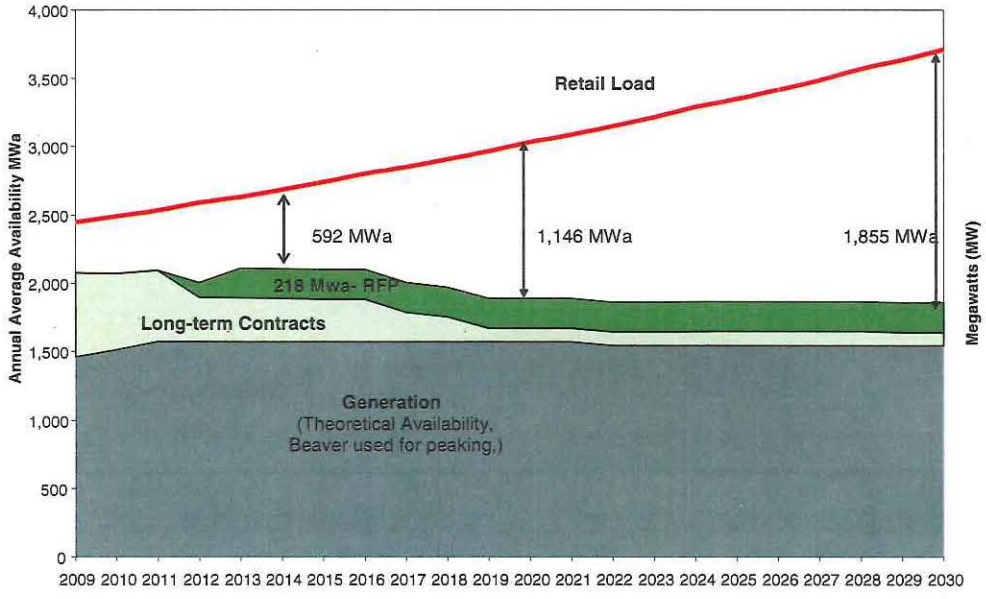
1. PGE resource gap and resource mix
2. BART cost effectiveness
3. BART visibility benefits
4. Reasonable Progress cost effectiveness

PGE Resource Need: Energy & Capacity

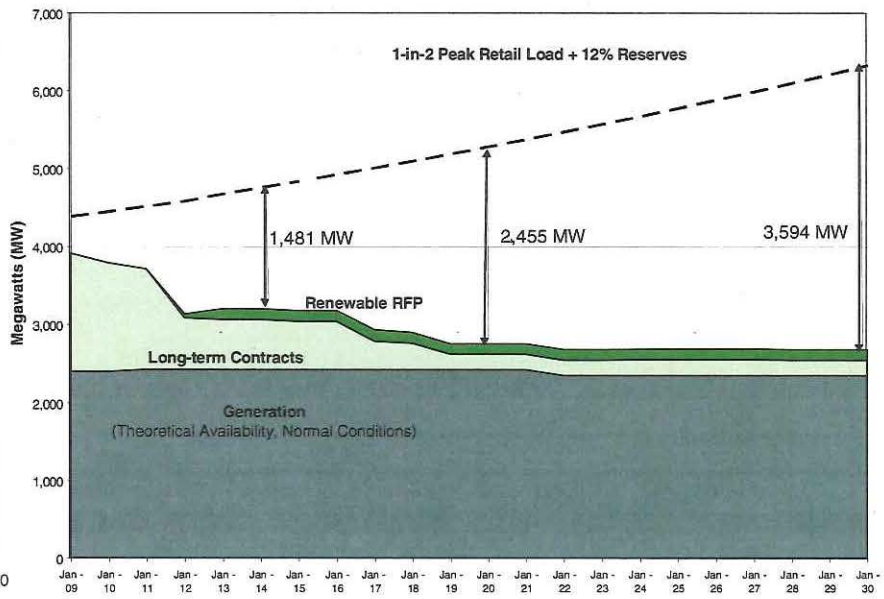
Load Growth

PGE's retail load is expected to grow consistently while selected long-term power purchase contracts expire, driving need for additional generation capacity

Resource Need: Energy



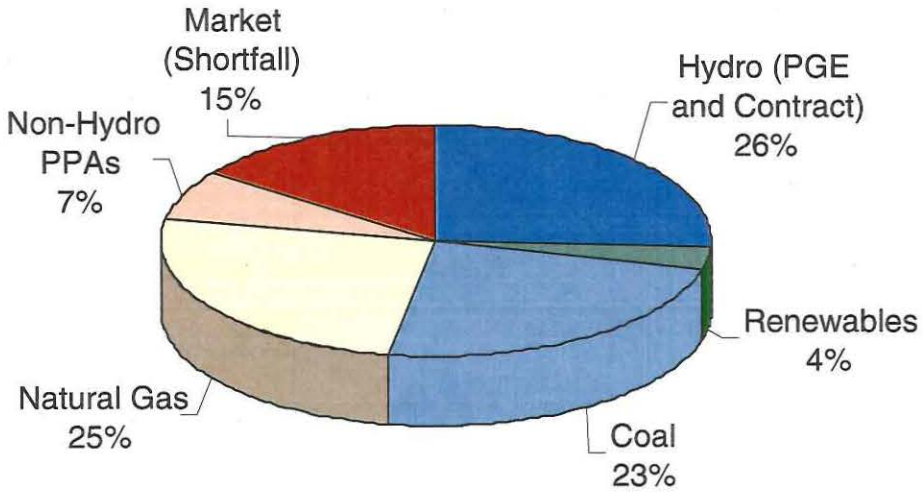
Resource Need: Capacity



Retail load = Net System load – 5-yr opt out (about 30 MWa).

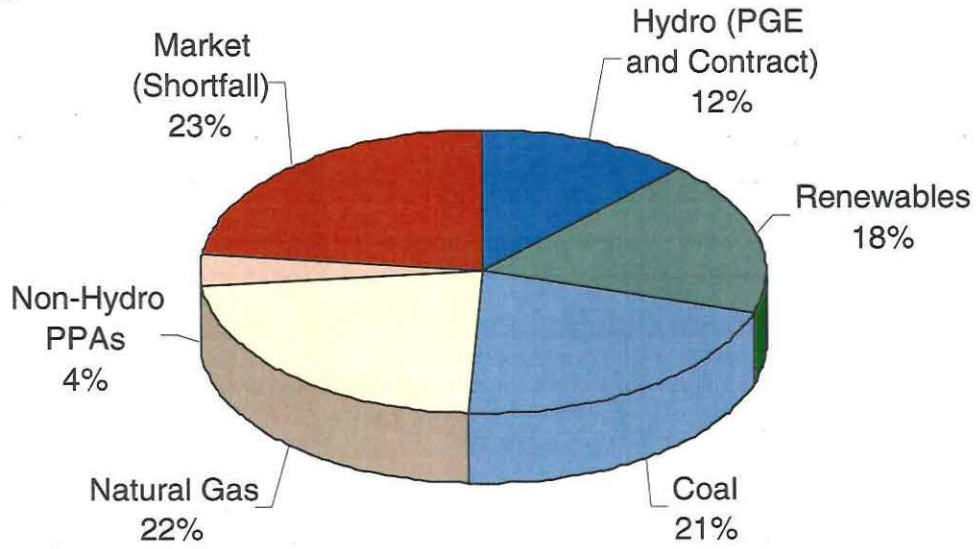
PGE's Diverse Power Supply Portfolio

2008



Energy as % of Load

2014



BART Cost-Effectiveness

- Operation through 2040 (and beyond)
  - Cost-effectiveness of SO_2 scrubber = $3,055/ton
- Operation through 2020
  - Cost effectiveness of SO_2 scrubber = $5,167/ton
- Cost-effectiveness range in Western U.S. BART determinations typically in $500 to $3,000/ton range.
- EPA set BART for large power plants at $400 to $2,000/ton range.
- If Boardman not operated after 2020, SO_2 scrubber fails cost-effectiveness criterion.

BART Visibility Benefits

- Operation through 2040 (and beyond)
  - ~26% decrease in visibility impacts at Mt. Hood by 2011
  - ~58% decrease in visibility impacts at Mt. Hood by 2014
  - Averages to ~55% benefit per year (2011 through 2040)
- Operation through 2020
  - ~26% decrease in visibility impacts at Mt. Hood by 2011
  - 100% decrease in visibility impacts at Mt. Hood by end of 2020
  - Averages to ~75% benefit per year (2011 through 2040)
- Visibility benefits of not operating Boardman after 2020 support not requiring SO_2 scrubbers.

Reasonable Progress Cost-Effectiveness

- Operation through 2040 (and beyond)
  - Cost-effectiveness of SCR = ~$4,500/ton
- Operation through 2029
  - Cost effectiveness of SCR = ~$7,300/ton
- No cost-effectiveness range established in Western U.S. for Reasonable Progress determinations.
- Cost-effectiveness range in Western U.S. BART determinations typically in $200 to $1,500/ton range.
- If Boardman not operated after 2029, SCR fails cost-effectiveness criterion.

Boardman

Clark
Cowlitz
Lewis
Skamania
Wahkiakum

Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322
(360) 574-3058 • Fax: (360) 576-0925
www.swcleanair.org

January 6, 2009

Brian Finneran
Air Quality Division
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, OR 97204

Re: Special Meeting on Proposed Rulemaking for Portland General Electric (PGE) Boardman Coal-Fired Power Plant and Regional Haze Plan

Dear Mr. Finneran:

The Southwest Clean Air Agency (SWCAA) has air quality regulatory authority for five counties in the State of Washington, including Skamania County and Clark County located within the Columbia River Gorge National Scenic Area. Air quality studies have confirmed that citizens of the State of Washington are having their scenic enjoyment of the Columbia River Gorge National Scenic Area significantly impacted by the PGE Boardman power plant's emissions. Similarly, Washington's residents will continue to experience these significant adverse impacts until BART emission controls are in place and operating at PGE Boardman. Because of these impacts on Washington's citizens and Washington's natural resources, SWCAA would like to respond to PGE's December 17, 2008 Preliminary Comments on the Oregon Regional Haze Rules as well as offer comments on the DEQ staff proposed emission control technology and emission limits for PGE Boardman and the DEQ staff timeline for installation of this emission control technology.

1. Respectfully Deny PGE's Compliance Schedule Delay Proposals for SO_2 and NO_x

PGE states in its December 17, 2008 comment letter that it supports DEQ staff's proposed SO_2 and NO_x BART emission limits for the PGE Boardman Power Plant. However, PGE then requests that it be allowed compliance schedule extensions to postpone commencing design and procurement on the SO_2 and NO_x emission controls until EPA formally approves the Regional Haze Rules into Oregon's State Implementation Plan (SIP).

SWCAA believes that PGE's compliance extension request is unnecessary. PGE's uncertainty concerns can be completely addressed by DEQ and PGE personnel having a face-to-face meeting with U.S. EPA Region 10 personnel in May 2009 after the Environmental Quality Commission's (EQC) final approval of the PGE Boardman emission limits rule in April 2009. After these discussions with EPA, SWCAA believes it will be apparent to PGE that the EPA SIP approval action for the BART emission limits will be an easy hurdle for DEQ to clear. Also, PGE has acknowledged in its

comment letter that DEQ has appropriately applied the BART rules to PGE Boardman. Thus, there is no dispute for EPA to overturn. In summary, SWCAA believes that the visibility and air quality impacts of the PGE Boardman Power Plant on Washington residents within the Columbia River Gorge National Scenic Area need to be reduced expeditiously.

An important milestone for PGE to immediately pursue in May 2009 after EQC final approval of the BART emission limits and timelines is seeking guidance from the Oregon Public Utilities Commission (OPUC) and other stakeholders to address cost recovery. Clearly, a response from OPUC within the next few months is of greater importance for PGE management's moving forward with the emission controls than EPA's SIP action.

As further background information on PGE's compliance extension proposal, not a single Washington company in SWCAA's 40 year history, including the emission controls for the 1,405 MW Centralia Power Plant, has ever requested that its air quality construction permit have an effective date for the commencement of construction be delayed until approval of the permit into the SIP by EPA. If this PGE request was a practice adopted by all Oregon industry, new industry construction and expansion of existing industry would totally collapse. DEQ's final Air Quality Permit summarizing the EQC's decision and also including monitoring and recordkeeping requirements should only take a few weeks to develop and issue to PGE based on the timeline that occurs in SWCAA's jurisdiction. Thus, PGE could have DEQ's final permit allowing commencement of design and procurement of the emission control equipment as soon as sometime in May 2009.

Further, in 1998 SWCAA, PacifiCorp and others reached a collaborative voluntary agreement to have emission controls installed at the 1,405 MW Centralia Coal-Fired Power Plant in Washington state that are similar to what is being proposed today by DEQ staff for PGE Boardman. It is noteworthy that the visibility impacts of PGE Boardman on Class I Wilderness Areas are as high as, or higher, than the impacts alleged for the Centralia Power Plant on Class I Mount Rainier National Park. Further, shutting down the Centralia Power Plant was one of the options evaluated by the Centralia collaborative group. Instead, PacifiCorp quickly recognized the importance of its $35 million payroll to the economic prosperity of Lewis County's citizens and PacifiCorp worked very hard to achieve a "win-win-win" for the preservation of local jobs, the expeditious reduction of visibility impacts from the power plant, and the enhancement of local job opportunities during the 4 year construction period. Today, the 1,405 MW Centralia Power Plant has sulfur dioxide emissions as low as 2,000 tons per year, a fraction of today's emissions for the much smaller PGE Boardman Power Plant.

PGE Boardman is now the single largest source of pollution in the near vicinity to federally protected Class I areas in Washington and Oregon and the Columbia River Gorge National Scenic Area. PGE Boardman has significant impacts in mandatory Class I areas (i.e., Mt. Hood and Mt. Adams wilderness areas) as well as the Columbia River Gorge National Scenic Area. Emissions impacts include visibility, flora and fauna (i.e., forest health and crop impacts), lake acidification, acid deposition in the Columbia River

basin watershed, and impacts to Native American rock art. Impacts can be identified several hundred miles away from the PGE Boardman plant due to atmospheric transport.

2. PGE's Proposal Adversely Impacts Bi-State Gorge Commission Air Quality Strategy Report

At the request of the Columbia River Gorge Commission, SWCAA and DEQ undertook a bi-state 7 year program in 2001 to evaluate causes of haze and visibility impacts in the CRGNSA. The Air Quality Strategy Report for the Columbia River Gorge Commission over these 7 years has been a bi-state effort with SWCAA representing the State of Washington and DEQ representing the State of Oregon. The PGE Boardman Power Plant was identified as having significant visibility impacts in the Gorge and controlling emissions from this facility constitutes the single most important and cost effective reduction that could be achieved in the near future. Installation of controls on the PGE Boardman plant that result in a significant reduction in emissions are a centerpiece of remedying visibility problems not only in the Gorge but also in the nearby Class I areas. SWCAA is unable to vision how an Air Quality Strategy Report based on PGE's proposal would have any visibility improvement benefits for Washington's citizens. Instead, adverse impacts to the State of Washington's interests and residents could be extended for an unacceptably long time under the PGE proposal (i.e., 2020). Another consequence of utilizing PGE's proposal is the major setback that it will cause SWCAA and DEQ in their relationships with the four Tribal Nations that have Treaty Rights within the Columbia River Gorge National Scenic Area (i.e., Yakama Nation, Nez Perce Nation, Confederated Tribes of the Warm Springs Nation, and Confederated Tribes of the Umatilla Nation).

3. Support DEQ Staff's Proposed Permit Emission Limits for PGE Boardman

SWCAA would like to communicate its support for the sulfur dioxide (SO_2) and nitrogen oxide (NO_x) emission control technology and emission limits that have been proposed by DEQ staff for the PGE Boardman Coal-Fired Power Plant. SWCAA believes the proposed emission limits are consistent with the emission limits that have been in operation at the 1,405 MW TransAlta Coal Fired Power Plant since 2002. It is also worth noting that PGE will be prudently operating the Boardman Power Plant, just like TransAlta operates the Centralia Coal-Fired Power Plant, so that its air pollution emissions are actually well below the emission limits. PGE management will want to have certainty that it will not incur permit violations and corresponding enforcement actions from either DEQ, U.S. EPA, or citizen lawsuits. As a result, actual air pollution emission levels from the PGE Boardman Power Plant will be even lower than the levels established by the permit emission limits.

4. Modify DEQ Staff's Proposal and Require Earlier Compliance Dates

SWCAA believes that the timeline needs to be hastened for achieving compliance with the proposed sulfur dioxide (SO_2) emission limit so that compliance occurs no later than July 1, 2013 (i.e., 4 years). A quicker compliance timeline for SO_2 emission controls is very achievable and important for several reasons. First, visibility impacts of the PGE Boardman Coal-Fired Power Plant on Washington communities and residents in the Columbia River Gorge National Scenic Area have been documented by several studies to

be significant. Specifically, studies by SWCAA and DEQ have estimated that visibility impacts for residents and visitors to the Columbia River Gorge National Scenic Area are being affected by up 2.3 to 4.6 deciviews. Since Gorge residents and visitors can detect a change in scenic panoramas at a 1.0 deciview change, the level of visibility impact caused by PGE Boardman is especially significant. Further, a study performed by Dr. Dan Jaffe (University of Washington) for the Yakama Nation estimated that visibility impacts on the Columbia River Gorge National Scenic Area could be even higher on some days. Second, a 4 year compliance timeline is equivalent to what SWCAA and TransAlta were able to achieve at the 1,405 MW TransAlta Centralia Coal–Fired Power Plant from 1998 to 2002. As proposed, PGE Boardman's sulfur dioxide (SO_2) emission controls are being allowed more than 5 1/2 years before compliance will be achieved (i.e., Environmental Quality Commission action is estimated to occur in April 2009 with sulfur dioxide emission controls proposed to be installed by July 1, 2014 and then an additional 6 months provided by DEQ staff to January 1, 2015 to achieve compliance). Third, the TransAlta Centralia Coal-Fired Power Plant achieved construction completion and compliance verification with SWCAA's emission limits within a 4 year or less time period.

SWCAA also recommends that the timeline be hastened for achieving compliance with the proposed nitrogen oxides (NO_x) emission limit so that compliance occurs no later than July 1, 2011 (i.e., 2 years). DEQ's proposal is to allow 3 years to achieve compliance with the proposed NO_x emission limit. A quicker compliance timeline for NO_x emission controls is important because of the significant impacts that nitrates have on the Columbia River Gorge National Scenic Area.

5. Responses to PGE's Other Regional Haze SIP Recommendations

It is true that the Regional Haze program can allow up to 5 years for installation of BART controls, however the timeline proposed by PGE far exceeds this timeline. The PGE Boardman Power Plant is far less complicated than the TransAlta Centralia Plant that was able to install and operate similar emission controls within 4 years. The argument that the Regional Haze rules provide 5 years to install control equipment is mischaracterizing the requirement. The requirement is to install emission controls as soon as feasible and practicable but not longer than 5 years. Due to the significant impacts from the PGE Boardman plant, the proposed controls should be installed sooner, not later as proposed by PGE.

Another issue that PGE has argued is that the term malfunction be included in the exemption for startup and shutdown events for determining compliance. This is a reasonable request on its surface; however DEQ needs to be aware that it is during these periods that there are large emissions from the PGE Boardman facility that contribute meaningfully to visibility, deposition, and other natural resource impacts. While excluded from the Regional Haze program consideration, these events have significant impacts. These events will happen over the course of normal operation and therefore necessitate the need to install the DEQ proposed BART controls sooner, rather than later, in order to minimize these impacts. The issue of Startup, Shutdown and Malfunction (SSM) has also come under recent regulatory review and may otherwise impact language

that should be included as an enforceable condition in the PGE Boardman permit. On December 19, 2008, the D.C. Circuit Court of Appeals issued a ruling vacating the Startup, Shutdown, Malfunction ("SSM") rules contained within the NESHAP General Provisions, 40 CFR, Part 63, Subpart A, Sierra Club v. Environmental Protection Agency (Docket Nos. 02-1135, 03-1219, 06-1215, 07-1201). While not directly applicable to the Regional Haze program at this point, the SSM provisions are generally meant to be consistent across all federal programs and any clarifications to the provisions to section 302(k) of the Federal Clean Air Act will need to be incorporated into the PGE Boardman permit.

6. Conclusions

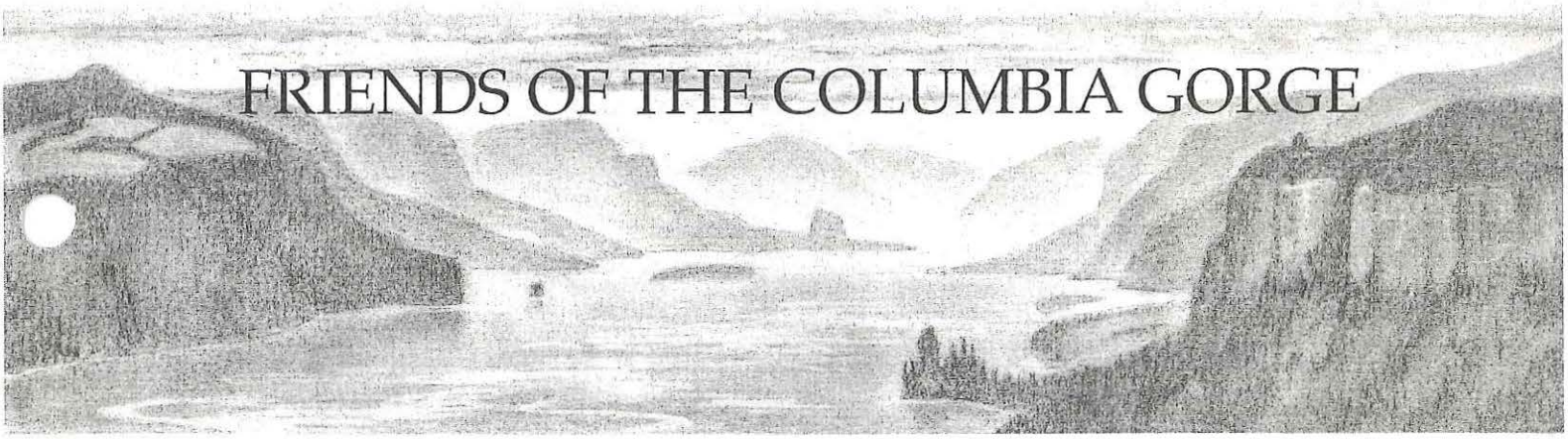
SWCAA has eight recommendations for this rulemaking. First, SWCAA believes that PGE's compliance extension proposals need to be respectfully denied. Second, SWCAA believes that PGE management can become as resourceful and creative as PacifiCorp management was in 1998 in finding a win-win-win solution that is reflective of the City of Portland and its citizen's long history of being strong advocates for protecting the environment. Third, a commitment by PGE management to install emission controls would preserve many jobs for at least 20 or more years whose loss would be catastrophic to the City of Boardman and surrounding region. Fourth, SWCAA is confident that PGE management has prudently acted for ratepayers to regularly apply maintenance to the Boardman Power Plant such that a 20 or more year extended life can be achieved. Fifth, PGE clearly has talent within its management ranks to be resourceful and creative as illustrated by the fact that PGE Executive Bart Withers left PGE in the late 1980s to become Chief Executive Officer (CEO) of the shortly thereafter world record setting Wolf Creek Nuclear Operating Corporation (WNOC) in Kansas, a nuclear power plant of the same design as Trojan Nuclear Power Plant. Sixth, DEQ staff's proposed emission controls and emission limits for PGE Boardman need to be adopted as proposed. Seventh, it is very important that the DEQ staff's compliance dates for the sulfur dioxide (SO_2) and particulate matter (PM) emission limits be revised to occur no later than July 1, 2013. Eighth, DEQ staff's proposed nitrogen oxides (NO_x) emission limit needs to be hastened such that compliance occurs no later than July 1, 2011 (i.e., 2 years).

On behalf of the citizens of the State of Washington, the Southwest Clean Air Agency (SWCAA) hopes that the Oregon Environmental Quality Commission will move forward expeditiously to implement the above recommendations. Thank you for the opportunity to submit these comments.

Sincerely,

Robert D. Elliott

Robert D. Elliott
Executive Director



Comments on the Proposed Regulations for the PGE Boardman Power Plant
Before the Environmental Quality Commission
By Michael Lang, Friends of the Columbia Gorge
January 6, 2009

Good evening. My name is Michael Lang and I am the Conservation Director of Friends of the Columbia Gorge (Friends). Friends is a nonprofit organization with 5,000 members that is dedicated to protecting and enhancing the outstanding scenic beauty, natural and cultural heritage, and abundant recreation opportunities within the Columbia River Gorge. Friends appreciates the opportunity to comment on the proposed regional haze rule and regulations for the PGE Boardman coal fired power plant.

The PGE coal fired power plant in Boardman was built during the early implementation of the Clean Air Act, however it was grandfathered under very questionable circumstances and has no modern pollution control devices. The power plant has also undergone modifications that should have triggered new source review and the application of the Best Available Control Technology (BACT), however the Department of Environmental Quality (DEQ) failed to impose this requirement. Due to this failure, the aging power plant continues to be the largest stationary source of sulfur dioxide and nitrogen oxides in the state of Oregon. In addition, the power plant is the second largest industrial source of mercury in Oregon.

The Boardman coal power plant is the largest single source of air pollution in the Columbia River Gorge National Scenic Area, where pollution impairs views 95% of the time and results in extraordinarily high levels of "acid deposition" that attain an acidity comparable to vinegar. The effects include poor visibility, damage to ecosystems, adverse effects to Native American cultural resources and threats to human health. In addition to its impacts on the Columbia River Gorge, U.S. Forest Service modeling of emissions from the power plant indicates that it is causing visibility impairment in 11 Class I airsheds throughout the Northwest.

The Department of Environmental Quality (DEQ) is taking public comments on a proposal that could improve Gorge air quality and reduce emissions causing global climate change. Unfortunately, the DEQ's current proposal is not aggressive enough to tackle the problem of air pollution in the Gorge.

To better protect and enhance air quality in the Columbia River Gorge and Class I airsheds throughout the Northwest, Friends recommends that the EQC adopt regional haze rule with an accelerated timeline and with more stringent control measures than proposed by the DEQ, or require early shutdown of the power plant.

Friends recommends the following changes to the rule proposal.

- Require low NOx burners to be installed by 2011 at the latest, but require the emission rates to be lowered. Lower emission rates reaching a 66% reduction (0.15 lbs/mmbtu) are reasonable and achievable.

- Accelerate the timeline for installation SOx and NOx controls.

- The proposed emission limitations should be strengthened to reflect what the proposed control technologies can achieve. Require industry-standard controls at Boardman to reduce harmful pollution by over 90% for SO2 and NOx.

- By the year 2011, PGE will have all the information necessary to make a decision about the future of the Boardman power plant. The new regulations should require PGE to decide by 2011 whether to install the most effective control equipment (Selective Catalytic Reduction system and a Semi-Dry Scrubber) or cease operation of the plant entirely, no later than 2020. PGE has no excuse for further delays.

- DEQ should insist that already planned and required mercury pollution reductions occur on schedule. Should PGE elect to cease all emissions by 2020 in lieu of installing extensive pollution controls, DEQ must require PGE to reduce mercury pollution by 90% by the regulatory deadline, which is 2012. Allowing PGE an extra two years to continue uncontrolled emissions of mercury, in addition to the many years the utility has already delayed installation of these controls, poses a significant threat to Oregonians' health and environment.

Thank you very much for considering these recommendations.