Talking Points for Public Hearings on Draft Cliffside Minor Source Permit

Minor Source? Major Problem

- Fresh off of a court order forcing Duke Energy to live up to its legal and moral responsibilities to limit air pollution from the additional 800-megawatt coal-burning boiler at its Cliffside power plant, Duke is again attempting to dodge tighter pollution controls by declaring itself a "minor source" of hazardous air pollution and requesting a less restrictive "minor source" permit. DAQ should protect the citizens of North Carolina rather than helping Duke duck its responsibilities.

- For the past three years, Duke has admitted that Unit 6 is a major source of air pollution that would emit over 217 tons of hazardous air pollutants each year. Although Duke has not made any changes to the pollution control equipment on the plant, Duke suddenly claims that Unit 6 will emit less than 25 tons of hazardous air pollutants each year—over an 85% decrease in emissions. The only thing minor about this draft permit is its reasoning.

- The draft permit assumes that Duke would consistently be able to remove 99.9% of the hydrochloric acid contained in Unit 6. This assumption has never been demonstrated during normal operating conditions and is not plausible. If this near-perfect removal rate were to drop by just a small fraction of 1%, Unit 6 would be a major source of hazardous air pollution.

- Even the company that manufactures the pollution control equipment for Duke's Cliffside power plant does not agree with Duke's minor source claims. If the pollution control company refuses to guarantee the minor source emissions levels that Duke touts, how can DAQ accept Duke's claim?

Health Impacts

- The 800-megawatt coal-burning boiler that DAQ's draft amended permit allows is anything but a minor source of air pollution. Unit 6 threatens the health and welfare of all North Carolinians and our environment by emitting excessive levels of dangerous chemicals, such as sulfur dioxide and carbon dioxide, and more than 50 hazardous air pollutants, including mercury, arsenic, dioxins, and other heavy metals.

- Mercury is a potent neurotoxin. Fetuses, breast-fed infants, and children exposed to methylized mercury are at risk for developing permanent neurological symptoms including mental retardation and seizures. The North Carolina Department of Health and Human Services has estimated that "at least 13,677 children per year" are born in North Carolina with blood mercury levels that place them at risk for lifelong learning disabilities, fine motor and attention deficits, and lowered IQ. Without more stringent mercury controls, DAQ's draft permit could place even more children at risk.

- The Cliffside draft minor source permit would allow Duke to emit nearly 170 pounds of mercury into the air every year. Recent, state-of-the-art studies, demonstrate that most of that mercury pollution will deposit within North Carolina, greatly increasing the risk mercury poses to North Carolina's children.

- In contrast to the draft Duke permit, the Virginia Air Board recently permitted a coal plant in Wise County, VA requiring far more stringent mercury controls. Though somewhat smaller (at 660 megawatts it has ¼ less generating capacity), the Wise County plant would only emit 4.5 pounds of mercury per year – nearly 40 times less than the Cliffside facility. And an existing plant owned by Reliant Energy in Seward, PA has been tested to emit only 1.5 pounds per year.

- Similarly, Duke would not be required to achieve maximum pollution controls for arsenic, dioxins, or the other 50 or more hazardous air pollutants the plant would emit. Dioxin is the most potent carcinogen known to humans. Arsenic and other heavy metals have been shown to cause cancer, birth defects, decreased intelligence, central nervous system damage, depressed immune systems, respiratory and gastrointestinal problems, and heart and vascular problems.