

Talking Points for Sunflower Electric Air Permit Comments:

All coal plants are dirty, but this one would be especially dirty

- The proposed sulfur dioxide emissions levels are far greater than levels being achieved by many coal-fired plants today. Exposure to sulfur dioxide can lead to adverse respiratory effects.
- Numerous other coal-fired boilers are currently achieving nitrogen oxide emissions levels much lower than Sunflower's proposed plant. Nitrogen oxides are a precursor to ozone, which even at very low levels is harmful to human health.
- Unnecessarily high levels of volatile organic compounds will be emitted from this coal plant. Volatile organic compounds, like nitrogen oxides, are a precursor to ozone pollution. Ozone pollution has been unusually high in rural Western Kansas. Adding new, unnecessary sources of ozone precursors could exacerbate the problem.
- Mercury emissions levels in this permit are greater than what's being achieved at many other coal plants. Mercury is a highly toxic pollutant that is especially harmful to pregnant woman and children.

Carbon emissions will be massive, coal plant not the most efficient design

- While even the cleanest coal plant is still dirty and dangerous, the proposed Sunflower plant will be particularly dirty. Sunflower is not even proposing the most efficient, cleanest form of pulverized coal combustion plant, which would be the more efficient ultra-supercritical power plant. Further, while the settlement agreement only calls for a supercritical power plant, the Governor's office supplied media and legislators with a factsheet that falsely described Holcomb II as an "ultra-supercritical coal generating unit." This is not what's reflected in the permit application. Dismissal of the ultra-supercritical coal plant also contradicts claims that this unit will be a "state-of-the-art" baseload unit.
- Sunflower's engineering contractor, Black & Veatch, determined an ultra-supercritical coal plant was the most efficient, cleanest, and least cost option when it studied the issue for Florida Power & Light in 2007.
- The operation of Sunflower's new coal plant, along with the transport of almost five million tons per year of coal from Wyoming, will result in the emission of 240 million tons of carbon dioxide over the 50 year life of the project.

Cleaner, home-grown fuels not considered

- Sunflower's rejection of a natural gas-fired combined cycle plant as too costly is outdated and wrong in an era of low-cost, abundant natural gas. While still a fossil fuel, natural gas emits significantly less carbon emissions and other pollutants than a coal plant. In terms of both pollution and cost, a moderately-sized combined cycle natural gas plant would be a far superior option for Sunflower than an oversized, dirty coal plant.
- Sunflower is proposing to build an unneeded, dirty coal plant in an area that is blessed with abundant wind resources. Rather than using clean, home-grown resources, Sunflower would be hauling in low grade coal, which is an outdated, non-native fuel source, at a cost of \$100 million per year.

Investing in dirty, risky technologies

- Many other states are moving forward with renewable energy technologies and even beginning to retire existing coal plants. Investing in a huge new coal plant could be equated to taking out a mortgage on a house that's burning down (GPACE original). Coal is seriously out-of-date.
- Upcoming regulations for carbon dioxide and other pollutants produced by coal plants will make the operation of the Holcomb II plant expensive. Increased regulations mean increased costs, which will ultimately be paid by ratepayers.

Helpful Resources:

Natural Resources Defense Council: Mercury: "Know Where it's Coming From"

<http://www.nrdc.org/health/effects/mercury/sources.asp>

American Lung Association: Ozone facts

<http://www.lungusa.org/healthy-air/outdoor/resources/ozone.html>

Sierra Club: "The Dirty Truth about Coal"

<http://www.sierraclub.org/coal/downloads/coalreport.pdf>

