

# Stationary Sources Joint Forum Update

Eric Massey  
Arizona Department of Environmental Quality

Lee Alter and Patrick Cummins  
Western Governors' Association

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# Background

- Regulatory requirements for regional haze
  - Best Available Retrofit Technology (BART)
  - Option for an alternative program to BART
  - Reasonable progress
- Other existing air pollution requirements & issues
- New federal initiatives
- Litigation
- Science continually evolving

# Regulatory Requirements

<b>BART</b>	<b>Alternative Program</b>
Identify eligible sources	Identify BART-eligible and any other sources
Determine which should be subject to BART	Demonstrate that alternative program provides for greater reasonable progress than BART
Conduct engineering analysis and set plant-specific limits	

# Regulatory Options

Options per state / tribe and per pollutant	Cases				
	1	2	3	4	5
BART for eligible sources	✓	✓			✓
BART-like for other sources		✓			
Alternative for eligible sources			✓	✓	✓
Alternative for other sources				✓	✓

# Two-Track Approach

- Provide support as needed for BART
  - Identify eligible sources (required for both tracks)
  - Provide forum for coordination
  - Engineering analyses performed by state/tribe
- Focus on providing an alternative program for at least SO<sub>2</sub> and NO<sub>x</sub>
  - Preserve SO<sub>2</sub> Annex
  - Participate in federal efforts
  - Contract to enhance technical basis in 2005
  - Policy work needed throughout 2005-06

# Identifying BART-Eligible Sources

- Until recently, the WRAP has only identified sources on the basis of SO<sub>2</sub> emissions in 9 states
  - Need to consider SO<sub>2</sub>, NO<sub>x</sub>, VOC, and PM in 14 states
- Objectives
  - Develop and maintain a regional database of eligible and potentially-eligible sources, their emissions, and current controls
  - Promote consistency in how sources are being identified across the region
  - Provide direct support to some WRAP members
  - Verify results for others

# Identifying BART-Eligible Sources

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WRAP			
CA	Others	Total	
397	1,108	1,505	Sources > 100 tpy in 1999 or 2002 <sup>a</sup>
162	832	994	Not eligible
		109	Eligible
		171	Potentially eligible (dates???)
189	42	231	Unknown / very little information

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(a) Includes some additional sources identified in Title V databases.

# Identifying BART-Eligible Sources

- Of the total potential BART source emissions, electric generating units comprise at least ...
  - 62% of SO<sub>2</sub> and NO<sub>x</sub> emissions
  - 37% of PM<sub>10</sub> and 3% of VOCs
- For non-EGUs, the eligibility of many sources will not be certain without additional information or verification of dates and potential emissions
- Draft report and database expected in a few weeks
- Unique consideration given to tribes and CA

# Alternative Program Technical Support Contract

- Purpose: To provide a sound basis for evaluating control scenarios
- 2002 emissions inventory
  - Analyze and review point and area source emissions
  - Recommend and implement improvements, especially regarding existing controls and oil & gas emissions
- 2018 emissions projection
- Evaluate available control technologies, costs, control efficiencies, and other impacts on the source and environment
- Proposals due November 16

# Alternative Program

## Other Work in 2005 - 06

- Program design issues
  - 2018 and interim milestones
  - Geographic, new source, and tribal considerations
  - Monitoring and reporting requirements
  - Allowance allocation
- Demonstrate greater reasonable progress than BART, taking into account on at least a category-wide basis ...
  - Current controls, available technology, costs, energy and nonair-quality impacts, and remaining useful life