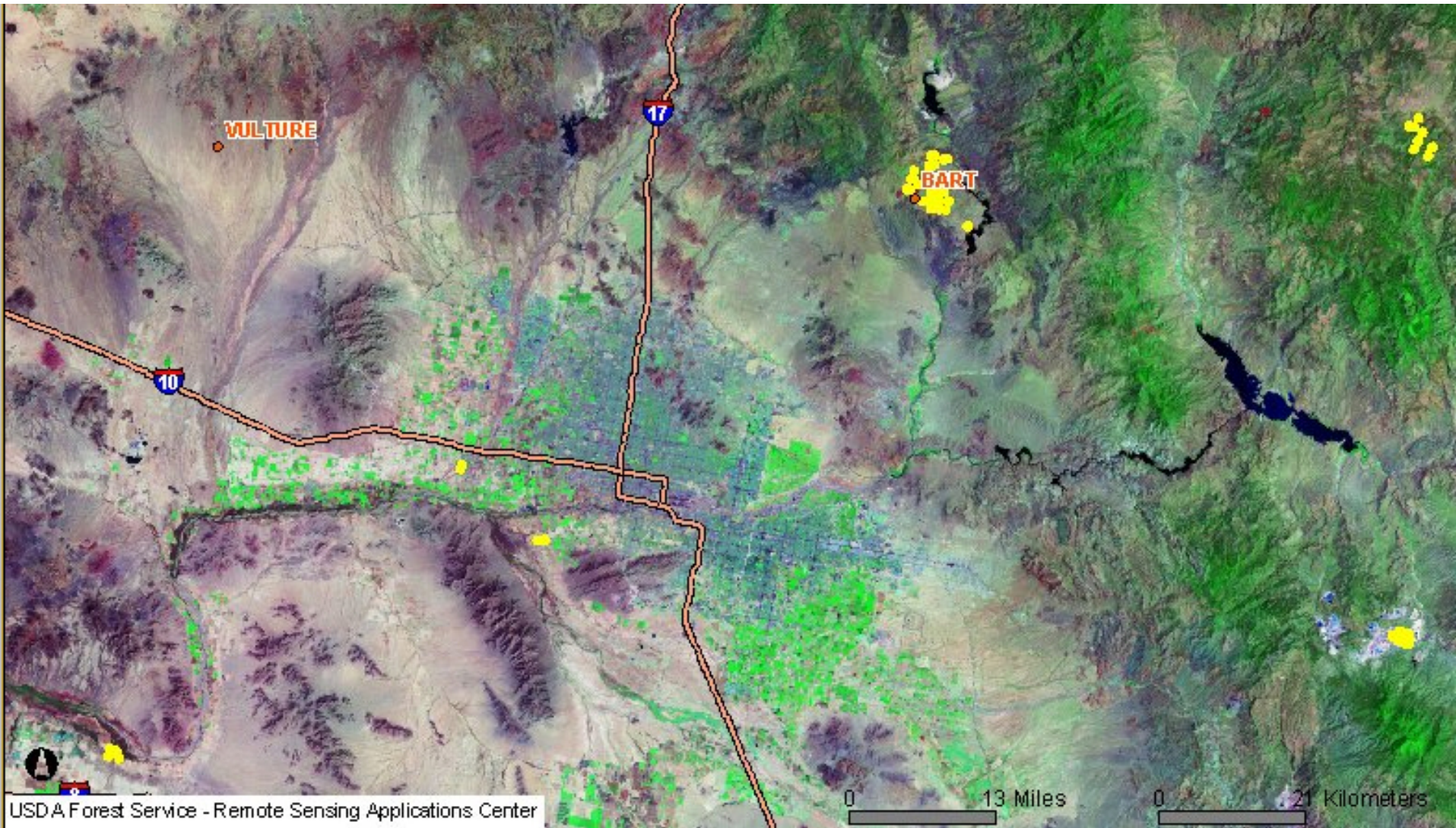


# Identification of BART-Eligible Sources in the WRAP Region

A Summary of the April 4, 2005  
Draft Report

# 11,000 Acre Bart Fire

May 17, 2005



# Regional Haze Rule Requirements for Best Available Retrofit Technology

- 40 CFR 51.308(e)(1)
  - Identify BART-eligible sources
  - Determine which of these should be subject to BART
  - Determine the appropriate control technology / limit
- 40 CFR 51.308(e)(2)
  - Allows an alternative program that provides for greater reasonable progress than BART
  - Must identify and include BART-eligible sources

# What Is a BART-Eligible Source?

- A stationary source is BART-eligible if ...
  - it belongs to one of 26 source categories,
  - has emission units which were “in existence” on 8/7/77 but “not in operation” before 8/7/62, and
  - has a potential to emit more than 250 tpy of a visibility-impairing pollutant across all date-eligible units.
- A BART source may be a portion of a facility
  - That portion may include more or less units over time as individual units are reconstructed or shut down

# Project 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
- Conserve resources

# How Were Eligible Sources Identified?

- Few states had a reliable list of eligible sources at the start of the project, and different interpretations of the BART guidelines
- Cast a wide net to identify category-eligible sources
  - National Emissions Inventory
  - State and federal Title V databases
  - Any source identified in a variety of EPA documents
    - Background docs for NSPS, MACT, AP-42, etc.

# How Were Eligible Sources Identified?

- As date and size information were obtained, sources were categorized as either ...
  - Yes *[at least part of the facility is BART-eligible]*
  - Likely *[2 of the 3 eligibility criteria are satisfied]*
  - Potentially
  - Don't know *[no data available for at least 2 criteria]*
- Eligibility for non-EGUs is only determined on a facility-wide level – i.e., at least part of the source is eligible

**Table 3-1. Source BART-Eligibility by Level of Certainty**

State	Number of Sources Considered	Level of Certainty (number of sources)				
		Yes	Likely	Potentially	Do Not Know	No
Alaska	29	2	5	3	1	18
Arizona	61	9	8	3	5	36
California	434	5	27	55	102	245
Colorado	156	11	1	6	3	135
Idaho	46	6	0	1	4	35
Montana	48	3	1	10	8	26
Nevada	48	8	0	1	0	39
New Mexico	153	6	4	4	12	127
North Dakota	30	6	2	3	0	19
Oregon	101	7	8	7	6	73
South Dakota	53	1	3	0	0	49
Utah	61	2	0	8	3	48
Washington	145	5	9	11	3	117
Wyoming	107	14	2	5	4	82
Tribal Land	97	2	0	3	3	89
<b>Grand Total</b>	<b>1,569</b>	<b>87</b>	<b>70</b>	<b>120</b>	<b>154</b>	<b>1,138</b>

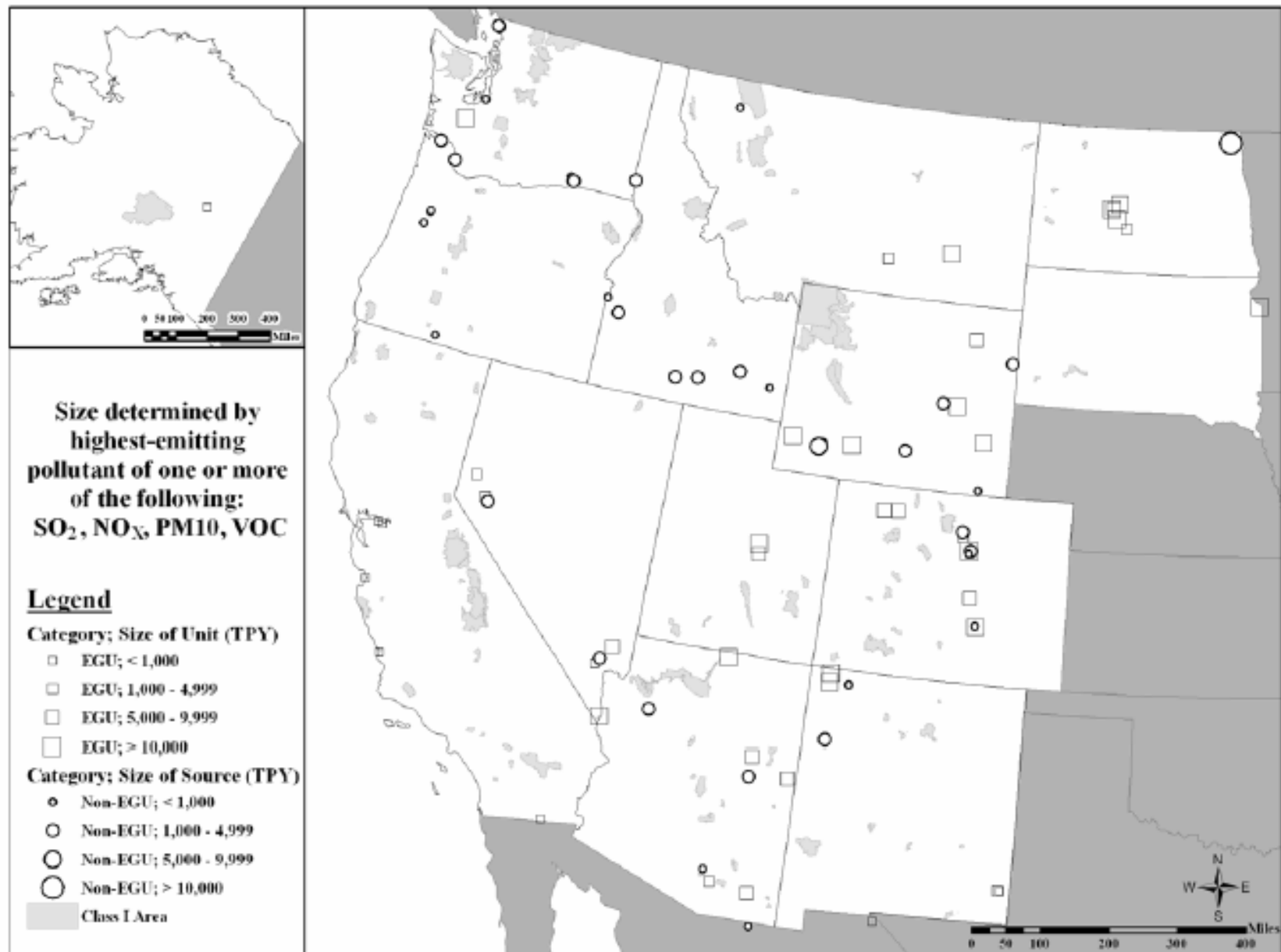


Figure 3-1. "Yes" BART-Eligible Sources and EGUs

Figure 3-4. NO<sub>x</sub> Emissions from EGUs and Facility-Wide Emissions from non-EGUs by Certainty of BART-eligibility and Other Sources in the WRAP Region (2002 Emissions)

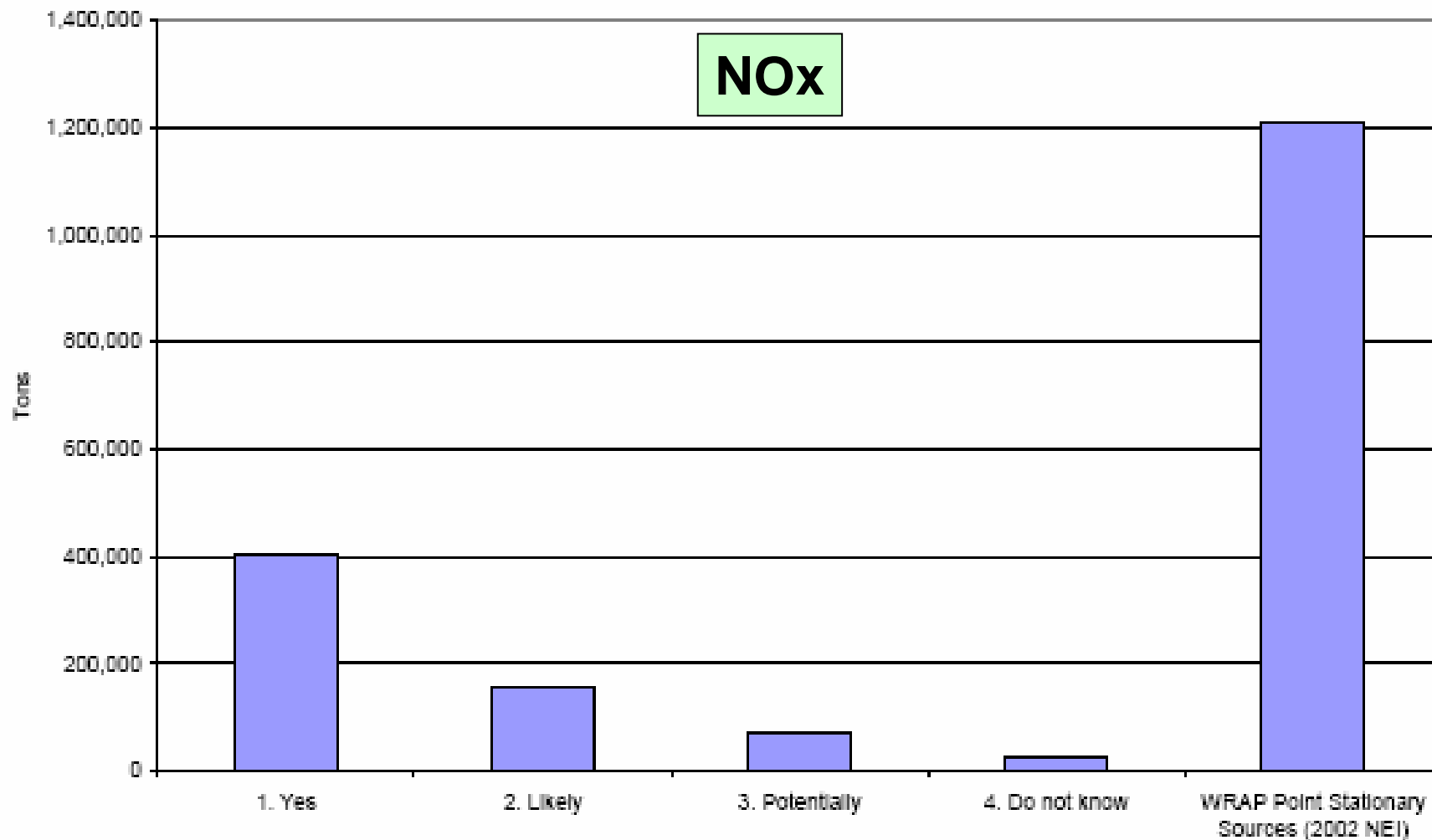


Figure 3-5. PM<sub>10</sub> Emissions from EGUs and Facility-Wide Emissions from non-EGUs by Certainty of BART-eligibility and Other Sources in the WRAP Region (2002 Emissions)

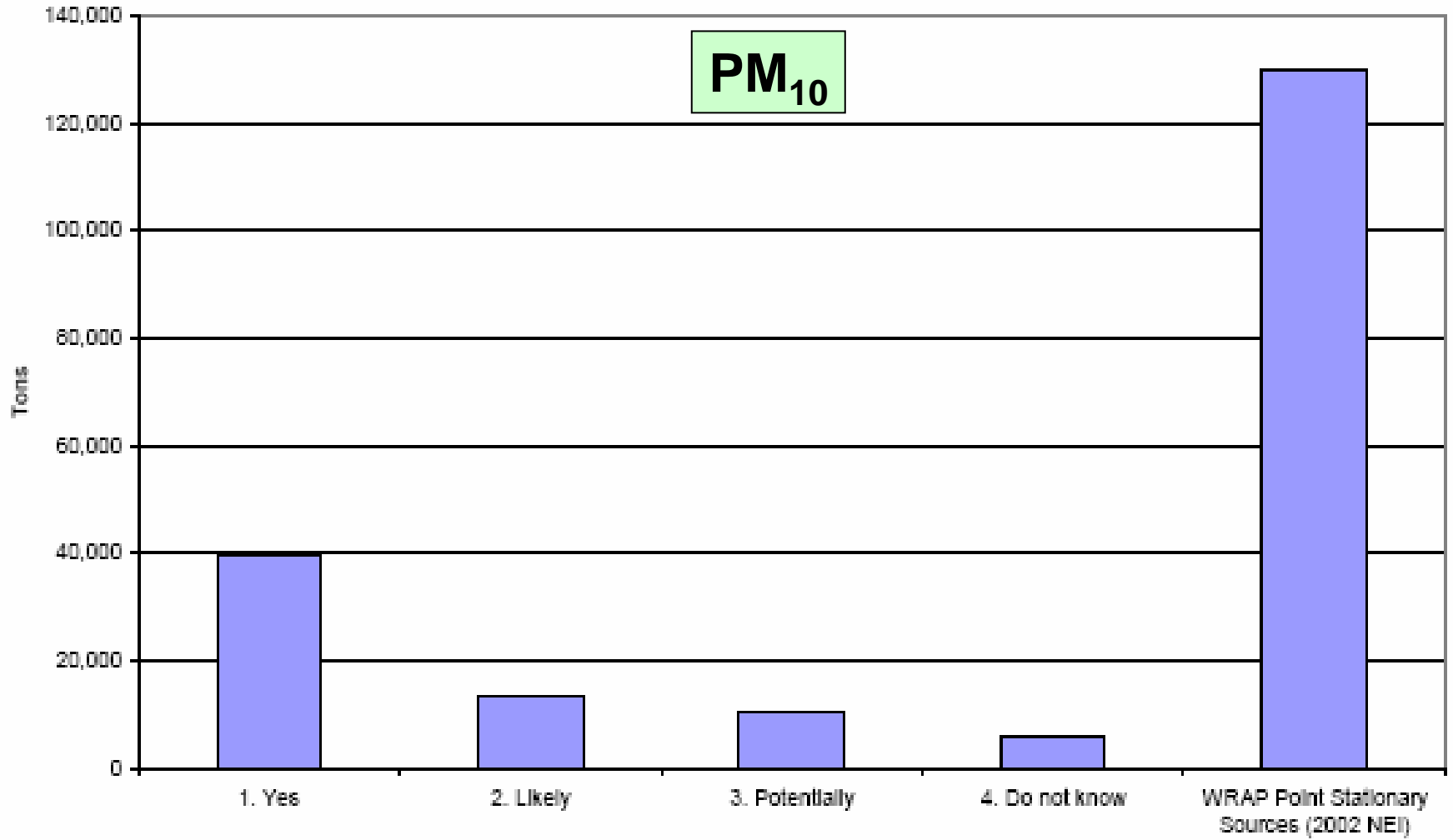


Figure 3-6. SO<sub>2</sub> Emissions from EGUs and Facility-Wide Emissions from non-EGUs by Certainty of BART-eligibility and Other Sources in the WRAP Region (2002 Emissions)

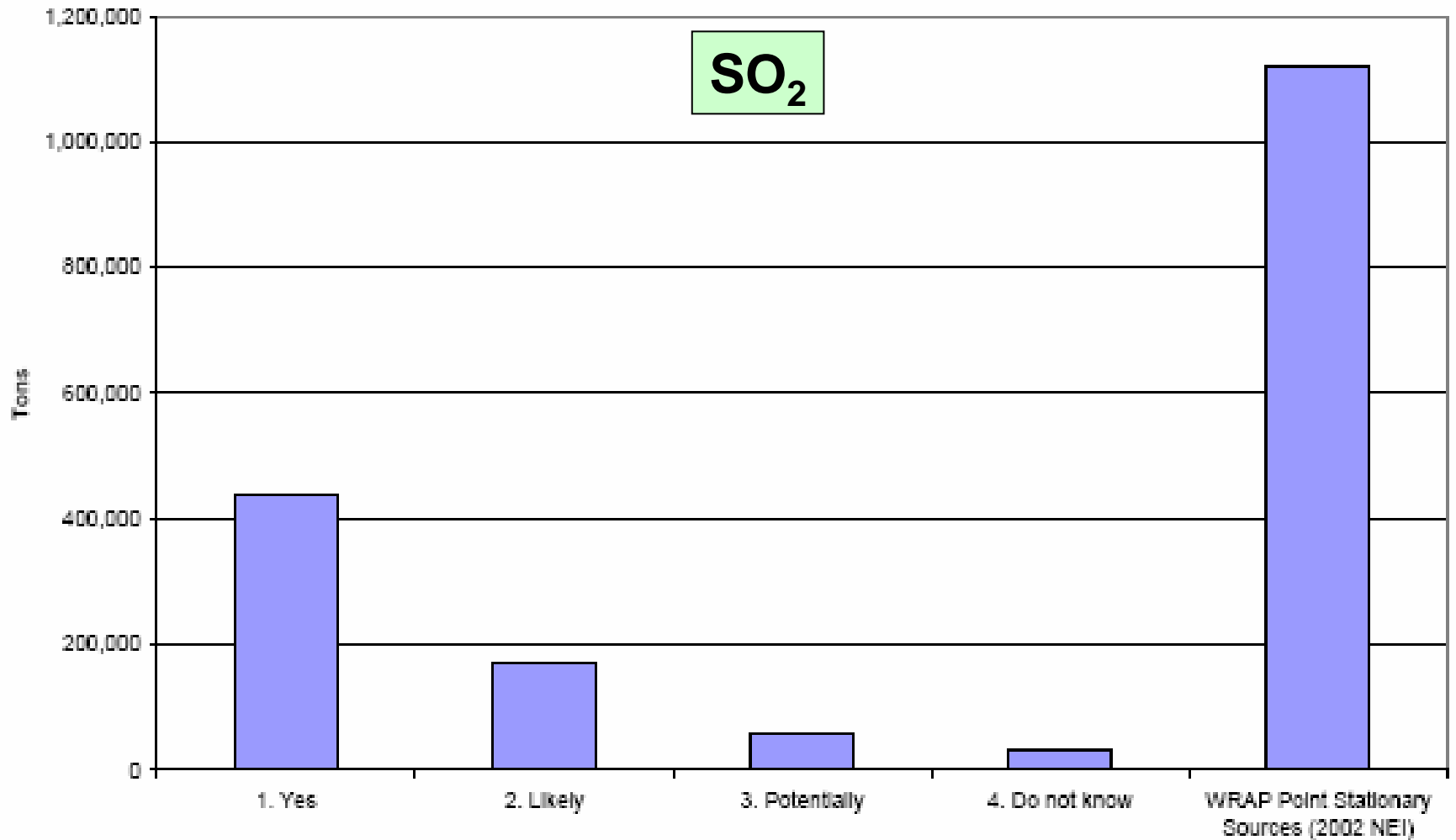


Figure 3-7. VOC Facility-Wide Emissions from Possibly BART-Eligible and Other Sources in the WRAP Region (2002 Emissions)

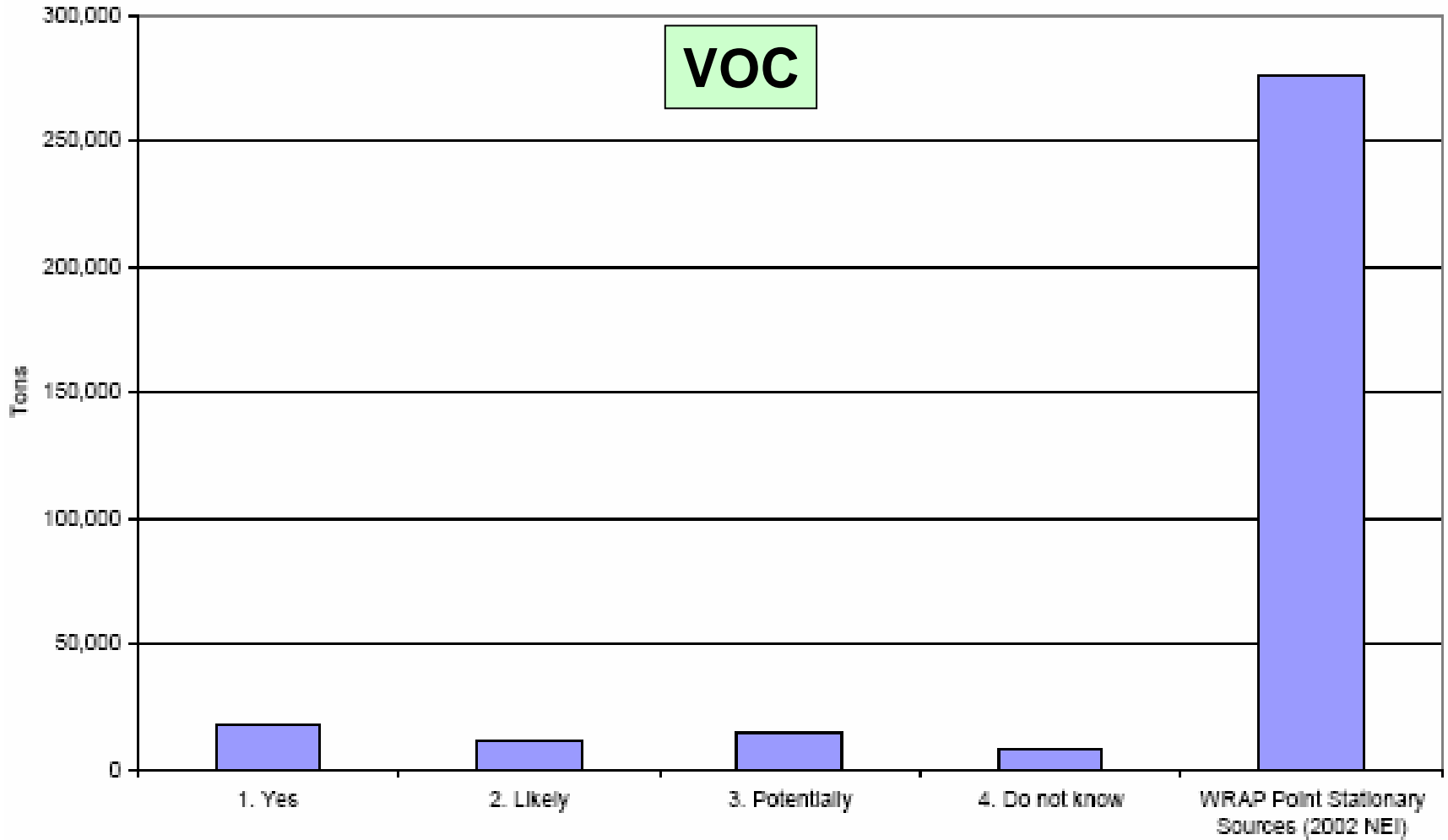
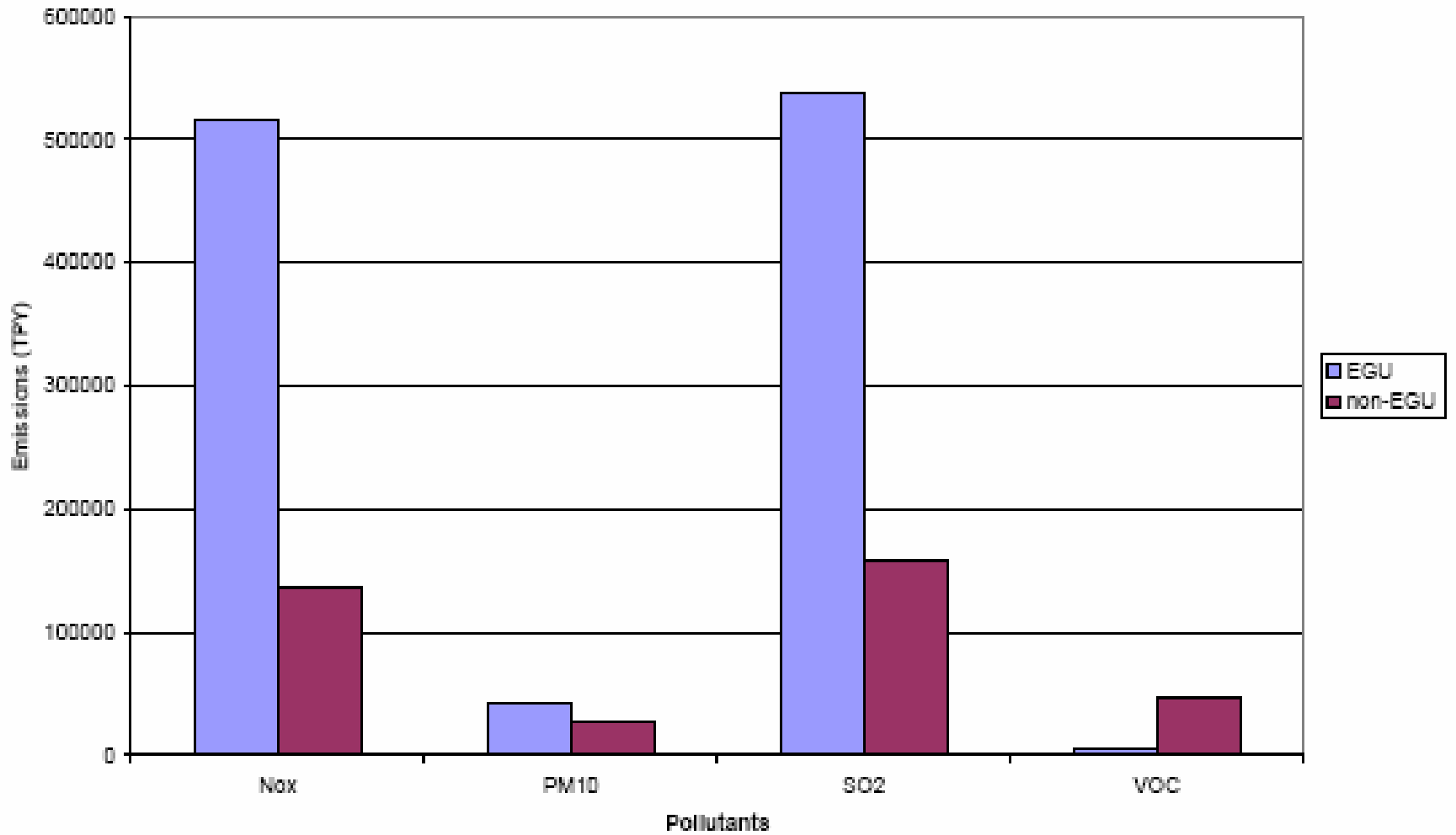


Figure 3-8. Comparison of Emissions from EGU Units and Non-EGU Sources ("Yes", "Likely", "Potential", and "Do Not Know" Levels of Certainty of BART-eligibility)



# Comments Received So Far

- No concerns about methods or clarity of report
  - One commenter said report is premature and conveys more confidence than justified
- Lime kilns at pulp mills are distinctly different from commercial lime kilns
- Specific feedback on about 30 facilities

# Next Steps

- Finish resolving EGUs at the unit level
- For non-EGUs, resolve the status of facilities which are possibly BART-eligible
- Maintain and update the BART eligibility list
- States/tribes act as conduits between owners/operators and regional BART list
- Improve data on current controls in place