

WRAP States BART Status

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WRAP IWG Meeting

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WRAP BART Application Status

State	# EGU Plants	# EGU Units	BART Application Date	# Non-EGU Plants	BART Application Date
AK	1	1	September '08	1	September '08
AZ	3	9	1st Q '08	1	January '08
CA	0	0	n/a	1	2008
			Summer '07; 1 resubmittal 1st Q '08		Summer '07; resubmittal 1st Q '08
CO	7	12		1	
HI	6	6	unknown	2	unknown
ID	0	0	n/a	1	2008
MT	2	3	Summer '07	3	Summer/Fall '07
NV	4	10	January '08	0	n/a
NM	1	4	June '07	0	n/a
ND	4	7	Summer/Fall '07	0	n/a
OR	1	1	Feb. '08	0	n/a
SD	1	1	2008	0	n/a
UT	2	4	2006	0	n/a
WA	1	2	Feb. '08	6	Dec '07; 1st Q '08
			1st Q '07 & Sep '07 Revisions Dec '07 & 1st Q '08		
WY	5	13		2	1st Q '07
Tribal	2	8	Nov '07 & Jan '08	0	n/a
Totals	40	81		18	
Last Year	44	95		49	many applications pending

BART Eligible Power Plants

AK	GVEA Healy
AZ	APS Cholla, AEPCO Apache & SRP Coronado
CA	None
CO	Colo Springs Drake, PSC Valmont, Cherokee, Comanche, Hayden & Pawnee, Tri-State Craig
HI	HECO Kahe & Waiiau, HELCO Kanoelehua, Hilo Coast, KIUC Port Allen & MECO Kahului
ID	None
MT	PP&L Colstrip & Corette
NV	Sierra Pacific Tracy & Ft. Churchill, Nevada Power Reid Gardner & SoCal Edison Mohave
NM	PNM San Juan
ND	Basin Leland Olds, Great River Coal Creek & Stanton & Minnkota Milton Young
OR	PGE Boardman
SD	Otter Tail Big Stone
UT	Pacificorp Hunter & Huntington
WA	Trans Alta Centrailia
WY	Pacificorp Dave Johnston, Jim Bridger, Naughton & Wyodak & Basin Laramie River
Tribal	SRP Navajo & APS Four Corners

BART Eligible Non-EGU Sources

AK	Agrium Urea, Conoco-Phillips LNG & Tesoro Refining
AZ	Abitibi Pulp
CA	Valero Refinery @ Benicia
CO	Cemex Lyons Cement
HI	Hawaiian Sugar & Tesoro Refining
ID	TASCO Sugar
MT	Columbia Falls Aluminum, Ashgrove & Holcim Cement
NV	None
NM	None
ND	None
OR	None
SD	None
UT	None
WA	BP Cherry Point & Tesoro Refining, Alcoa Ferndale, Port Townsend & Weyerhaeuser Longview Pulp & Lafarge Cement
WY	FMC Green River, General Chemical Soda Ash Plants
Tribal	None

BART Status: Alaska

- RMC completed “Subject to BART” modeling for 7 AK sources April 6, 2007 (Chugach Beluga Plant subsequently determined to be NOT BART-Eligible)
- all sources showed impacts above the 0.5 dV threshold, but some remodeling with revised meteorological data to be exempted from “Subject” status (Alyeska Terminal MLP Sullivan & Tesoro Refinery modeled out)
- Alaska adopted their “BART Rule” effective 12/30/07, and “official Subject to BART” letters went out in January ’08
- Conoco-Phillips Kenai LNG plant is seeking a FEPL to escape BART
- GVEA & Agrium BART control applications were submitted in 2008 and are under review
- BART determinations are expected around March ‘09

BART Status: Arizona

- RMC completed “Subject to BART” modeling for 14 AZ sources May 25, 2007
 - (4) Apache Nitrogen, Chemical Lime Douglas, Phelps Dodge Morenci & Salt River Project San Tan plants exempt
 - (9) Abitibi Pulp Mill, Arizona Portland Cement Plant, Chemical Lime Nelson, ASARCO Hayden & Phelps Dodge Miami Copper smelters are the non-EGU’s “Subject to BART”. Coal fired power plants at AEP Apache, APS Cholla, West Phoenix & SRP Coronado are also Subject
- Arizona notified the 9 “Subject to BART” sources of their inclusion in the BART program in July & BART control applications were due December 14, 2007
- The Hayden & Miami smelters, Chemical Lime Douglas, Arizona Portland & APS West Phoenix are negotiating the BART determination, remodeling or seeking a FEPL to escape BART
- Abitibi Apache, Cholla & Coronado submitted early 2008 applications and are under review
- BART determinations are expected in 2009

BART Status: California

- has determined that a number of originally determined BART-eligible sources were mis-characterized in the clearinghouse in that they did not meet one or more of the BART factors (age, emissions or source category)
- has determined that a number of BART-eligible sources won't require further control because of strict existing/planned emission limitations
- has conducted "Subject to BART" modeling for a limited number of sources – results exempted all but one
- Valero Refinery at Benicia is the only source finally determined to be Subject to BART
- held hearings and adopted their RH SIP on January 22, 2009
- final BART provisions for Valero are to be released shortly

BART Status: Colorado

- BART levels Proposed in 2007 – Colorado Air Quality Control Commission accepted all but two - Cemex Cement & Martin Drake Power Plant remanded back to CDPHE
- Coal Fired Utility Rates :
 - SO₂ between 0.10 & 0.13 lb/MM Btu (lime spray driers)
 - NO_x between 0.15 & 0.39 lb/MM Btu (Low NO_x Burners & OFA)
 - (Colorado law eliminates post combustion NO_x control option – for boilers)
 - PM at 0.03 lb/MM Btu
- Established a 10,500 ton bubble for SO₂ at Xcel Energy's Metro Denver Plants: Cherokee 1-4, Valmont 5 ..&.. **Arapahoe 3-4 [non-BART] Units (Arapahoe 1&2 retired)**
- Cemex Cement – CAQCC prohibited post-combustion NO_x control for coal EGU's but exempted non-utilities
 - Kiln: proposed SNCR for 268 pph NO_x, Process Control SO₂ @ 0.3 lb/Ton feed, PM 0.03 lb/MM Btu [Clinker Cooler - 0.1 PM]
- Martin Drake – proposed lime spray driers (0.15 lb/MM) SO₂ on two units, 1.2 lb/MM on the third; OFA for 0.35 lb/MM NO_x

BART Status: Hawaii

- Hawaii has 8 sources listed as BART-Eligible
- They were working to prepare an RFP to get MM5 files for Hawaii necessary to complete “Subject to BART” modeling
- the “Subject to BART” modeling, the BART control engineering analysis, the review and notice will likely push BART determinations sometime in to 2009 or later

BART Status: Idaho

- Idaho completed a first round of “Subject to BART” modeling in 2005 & 2006
- Only the coal fired industrial boiler at Amalgamated Sugar (TASCO) Nampa plant was found to be “Subject to BART”
- The TASCO Nampa control analysis was received in January 2008 and a BART proposal was received in February 2009
- Idaho DEQ intended to set target modeled BART level visibility dV levels and allow TASCO to meet those visibility targets with an operating scheme producing equivalent emission reductions, but TASCO’s BART proposal pleads “economic hardship” in using a technically feasible option. Idaho is consulting with FLM’s/EPA on the acceptability of the proposal.
- P4 Production’s Soda Springs Plant was also Subject to BART, but they will meet BART level control through retrofits installed under an NSR permit revision (to address NAAQS violations). The exact terms of those controls is still under negotiation.

BART Status: Montana

- RMC completed “Subject to BART” modeling for 9 MT sources May 30, 2007
 - (4) Cenex, Exxon, Montana Sulfur & Smurfit Stone exempt
 - (5) Columbia Falls Aluminum, Ash Grove & Holcim Cement, PP&L Corette & Colstrip Plants are “Subject to BART”
- Montana DEQ bowed out of RH in June 2006, therefore EPA is now responsible for the Montana Regional Haze FIP
- BART control applications are submitted for the Ash Grove & Holcim Cement, and the PP&L Corette & Colstrip Plants over June–August ’07, with the Columbia Falls Aluminum application submitted in November ‘07
- EPA has contracted with EC/R to complete the BART evaluations -- but there is no schedule for completing the review
- EPA will prepare the Montana FIP and will go out to Public notice with BART determinations when they release the FIP (may not be finalized until sometime in 2010)
- The ASARCO Helena lead smelter has been decommissioned and has been notified that it will require a NSR BACT permit to resume operations

BART Status: Nevada

- RMC completed “Subject to BART” modeling for 5 NV sources May 14, 2007
 - (2) Chemical Lime & Nevada Power Sunrise exempt
 - (3) Nevada Power Reid Gardner & Sierra Power Ft. Churchill & Tracy are “Subject to BART”
 - So. Cal Edison Mojave is also “Subject”, but the plant is not currently operating
 - Nevada Cement re-modeled their “Subject to BART analysis and Nevada Air Quality concurred that the new results exempt Fernley from further BART evaluation
- Nevada Air Quality Commission Nov ‘08 hearing:
 - NO_x proposed 0.12-0.28 lb/MM using Low NO_x burners
 - SO₂ proposed 0.05 lb/MM gas or #2 fuel oil (SPPC); 0.0019 lb/MM gas only (Mohave); 0.40 lb/MM existing FGD’s on Reid Gardner
- BART determinations expected in mid-2009

BART Status: New Mexico

- RMC completed “Subject to BART” modeling for 10 NM sources April 21, 2007
 - (9) Amoco Abo, SWPS Cunningham & Maddox, Duke Artesia & Linam Ranch, Dynegy Saunders, Giant San Juan & Ciniza, and Marathon Indian Basin plants are exempt
 - (1) PNM Reeves Station was subsequently found to have begun operation prior to the August 1962 BART timeframe
- Public Service of New Mexico San Juan coal fired power plant is “Subject to BART”, but is also under a Consent Decree mandating improved controls
- PNM submitted a BART control application June 6, 2007 with evaluation currently under way to determine whether the Consent Decree controls also meet BART
- NM Air Quality has requested additional modeling, OAQPS cost data, and additional information on overfire air technology – in addition they are evaluating “visibility disbenefit” from application of SCR (artifact of control assumptions on SO₃)
- a determination on whether any additional BART control is required, is expected sometime in 2009

BART Status: North Dakota

- ND completed “Subject to BART” modeling of their 7 sources in the Spring of 2006
 - (3) American Sugar, MDU Heskett & Tesoro Refining exempt
 - (4) Basin Leland Olds (U1&2), Great River Coal Creek (U1&2) & Stanton (U1), and Minnkota Milton Young (U1&2) Coal Plants are “Subject to BART”
- BART control applications submitted in July ‘06
- ND has essentially completed their determinations for SO₂ & PM, but NO_x control still has the decisions deadlocked over whether SCR can be used effectively with ND lignite coal (Minnkota was preparing a BACT analysis on SCR)
- Final BART determinations are on the same schedule as completion of their RH SIP, and these are expected prior to the end of 2009

BART Status: Oregon

- Oregon completed “Subject to BART” modeling in Feb ‘07
 - (5) Georgia Pacific in Toledo, and the Kingsford & Smurfit plants in Springfield were exempt in the first round of modeling - remodeling with revised ozone data later exempted both the Boise Cascade St. Helens and the Pope & Talbot Halsey plants
 - Ft. James Wauna Mill, International Paper (Weyerhaeuser) Springfield plant, Amalgamated Sugar Nyssa plant and the PGE Beaver gas fired turbine power plant are negotiating FEPL’s which would reduce their Class I impact below the 0.5 dV impact threshold, and remove them from BART requirements
- PGE Boardman coal fired EGU is “Subject to BART”
- December ‘08 DEQ proposal
 - Semi-dry limestone scrubber for 0.12 lb/MM SO₂
 - PJFF added to ESP for limestone dust & PM at 0.012 lb/MM
 - Low NO_x Burners w/ OFA for 0.23 lb/MM NO_x under BART
 - Phase II SCR for 0.07 lb/MM NO_x in 2017 for RP
- Public comment on Boardman to be reviewed & final recommendations to be made by DEQ to the EQC in June ‘09

BART Status: South Dakota

- RMC completed “Subject to BART” modeling for 2 sources August 15, 2007. Results indicate:
 - Pete Lien does not have a 0.5 dV impact on any Class I area
 - 450 MW Otter Tail Power Big Stone Plant does have a 0.5 dV impact on several Class I areas in the region “Subject to BART”
- Big Stone beyond Calpuff range at 450 KM from nearest Class I area, so Otter Tail remodeled using a long distance model
- SD is reviewing results and seeking FLM/EPA concurrence on modeling results before making an official determination on whether the Big Stone Plant is “Subject to BART”
- once a determination is made, engineering evaluation of potential BART control options, and review of the selected proposal will push BART determinations into late 2009
- NSR Permit for a 600 MW Unit 2 will include BART-like retrofit controls on Unit 1 to attempt to “net out” of BART

BART Status: Utah

- only two BART-Eligible Sources in Utah: Pacificorp Hunter & Huntington Plants
- RMC completed “Subject to BART” modeling for 2 UT sources April 21, 2007, which indicated both Pacificorp plants do exceed the 0.5 dV Class I area impact threshold
- Pacificorp made commitments to meet or exceed presumptive BART limits at these plants under their Mid-America buyout agreement (installation of wet-lime FGD’s, baghouse’s and low-NOx combustion controls)
- Utah issued permits for legally enforceable limits on Huntington 2 in April ’05, Hunter 1-2 in March ’08, Huntington 1 anticipated for June ‘09
 - 0.12 lb/MM Btu SO₂ // 0.26 lb/MM Btu NO_x

BART Status: Washington

- Washington requested that each of the 14 BART-Eligible facilities in the state conduct “Subject to BART” modeling in early 2007
 - (7) Goldendale Aluminum, Phillips 66, Puget Sound Refining & Simpson Kraft were found to be exempt in the first round of modeling - remodeling with revised ozone data later exempted Ft. James Camas, Longview Fibre & ALCOA Wenatchee plants
- Of the remaining 6 plants currently “Subject to BART”, FEPL control applications for Port Townsend Paper, Weyerhaeuser Longview, LaFarge Cement and INTALCO Ferndale Aluminum were submitted by the end of 2007 – applications for Tesoro Northwest & BP Cherry Point Refineries, and for the Trans Alta Centrailia coal fired power plant were expected in the first quarter of 2008
- Public Notice is anticipated for these 6 BART proposals in April-May ‘09, with final determinations anticipated prior to the end of 2009

BART Status: Wyoming

- Wyoming contracted out “Subject to BART” modeling for 14 facilities in early 2006
 - Black Hills Neil Simpson I, Dyno Nobel, P4 Production Coking, Sinclair Oil Casper and Sinclair Refineries were exempt – remodeling of FMC Granger also fell below the 0.5 dV guideline
 - OCI Trona was eventually determined to be not BART-Eligible
- “Subject to BART” Facilities include General Chemical, FMC Green River industrial boilers, along with Basin Electric Laramie River & Pacificorp EGU’s at Dave Johnston, Jim Bridger, Naughton and Wyodak plants)
- BART control applications were submitted in late ’07 for Pacificorp EGU’s, March & April ’07 for the FMC and General Chemical Trona Plants. The Basin Electric Laramie River application was received in September ’07. Pacificorp revisions were submitted in Dec ’08
- Public Notice of BART proposals for the trona boilers issued 8/04 and EGU proposals are currently being developed
- BART determinations expected prior to the end of 2009.

BART Status: Tribal Sources

- EPA is responsible for completing BART analyses for sources located on Tribal lands
- the Region 9 EPA Office is responsible for:
 - APS Four Corners power plant (FCPP) located in northwest New Mexico & SRP Navajo Generating Station (NGS) located at Page in northern Arizona, both BART-Eligible sources situated on the Navajo Indian Reservation
- Region 9 EPA made a direct determination that these two plants are “Subject to BART”, bypassing the modeling demonstration as their high emission totals and proximity to Class I areas gave strong indication that modeling would show over 0.5 dV impact
- Region 9 EPA received a BART control plan from the NGS plan in November, and from the FCPP plan in Dec '07 (revised FCPP Dec '08, SRP Jan '09)
- Both plants went through Federal permitting recently with BART level SO₂ limits in place – EPA is focusing on NO_x & PM
- EPA is reviewing these proposals and expects to make BART determinations prior to the end of 2009

Probable BART Completion Matrix

State	Mid-Late 2009	Other
Alaska	X	
Arizona	X	
California		DONE
Colorado		DONE
Hawaii		Later ?
Idaho	X	
Montana		2010
Nevada	X	
New Mexico	X	
North Dakota	X	
Oregon	X	
South Dakota	X	
Utah	X	
Washington	X	
Wyoming	X	
Tribal	X	