

BART Status of Other States

AK, Bernalillo County, HI
ND, SD, OR, WA

AK

- Seven BART-eligible sources
- About half emissions are from non-EGUs
 - Fuel conversion and chemical process plants
- WRAP completed CalPuff modeling, but model performance under review

Bernalillo County, NM

- Two potentially-eligible sources
 - Gas-fired EGU boiler
 - Cement plant
- Staffing issues have delayed resolution of eligibility status
- Assistance to determine eligibility and perform modeling available from WRAP

HI

- Eight BART-eligible sources
 - 6 EGUs, a refinery, and an industrial boiler
- State has initiated modeling process

ND

- Seven BART-eligible sources
 - 5 EGUs, a refinery furnace, and an ind. boiler
 - No major issues identifying eligible sources, although obtaining start-up dates for older units was a challenge
- Contribution modeling
 - Completed about a year ago
 - Only major issue was whether to allow sources to conduct refined analyses (allowed)
 - One EGU did so and is not subject to BART

ND

- BART control analyses
 - Received analyses from all subject sources
 - All 5 BART factors are included
 - Review process similar to BACT
 - Major issues
 - Cost threshold -- Drawing some cues from EPA costs estimated in CAIR, BART, and Annex rules
 - Several companies rejected more efficient and cost-effective technologies because of small visibility improvements (< 0.1 dv)
 - Feasibility of SCR with lignite uncertain

SD

- One eligible EGU, and one potentially-eligible lime plant
- EGU more than 300 km from nearest area
 - CalPuff will not be used

OR

- Eleven BART-eligible sources
 - 2 EGUs, pulp mills, boilers, and petro storage
 - No major issues identifying eligible sources
- Contribution modeling still underway, but petro storage facility already found to be not subject
- BART control analysis
 - Not yet discussed control limits or 5 factors, except for Boardman EGU, which started early
 - Examples from other states would be helpful

WA

- 15 eligible sources
 - 1 EGU, pulp mills, cement plants, refineries, lime plant, aluminum plant
 - Some difficulty determining construction dates, but ultimately each was verified
- Contribution modeling
 - Common protocol with Region 10, OR, ID
 - Source have not yet completed modeling
 - Some are expected to revise potocol to address terrain issues

WA

- Some sources are small and may not be subject to BART
- Another source may take an enforceable limit below 250 tpy
- BART control analysis
 - Hoping for source submittals in Sept, which would include analysis of all 5 factors, but BART orders probably not issued before Dec.
 - Centrailia EGU probably met for SO₂ and PM
 - Examples from other states would be helpful, including cost effectiveness for various sources