

REQUEST FOR PROPOSAL

**WESTERN GOVERNORS' ASSOCIATION
WESTERN REGIONAL AIR PARTNERSHIP (WRAP)**

Identifying BART-Eligible Sources in the WRAP Region

January 16, 2004

**REVISED
February 9, 2004**

REVISIONS MADE TO JANUARY 16, 2004 VERSION

Section 5.0, page 20 – Experience related to “air quality data” was expanded and clarified to include “air quality and/or emissions data.”

Section 5.0, page 20 – The request for five hard copies of the proposal was changed to seven, consistent with the request on page 6.

Section 5.13, page 23 – The expected contract duration was extended from 6 months to December 31, 2004 to be more consistent with the schedule described in Section 4.0.

INVITATION TO BID

DATE: January 16, 2004

BID NO: 04WGA129WRAP

DIRECT INQUIRIES TO: Richard Halvey
(303) 623-9378

RETURN BID TO: Western Governor's Association
1515 Cleveland Place, Suite 200
Denver, Colorado 80202
Attn: Richard Halvey

DATE BID DUE: February 18, 2004

Bids properly marked as to BID NO., DATE, and HOUR of opening, subject to the conditions herein stipulated and in accordance with the specifications set forth and/or attached hereto, will be accepted at the address listed above, prior to the date and time listed for the bid opening. All bids shall be quoted F.O.B. destination, unless otherwise specified, to the delivery location or jobsite listed herein.

**SEALED COMPETITIVE PROPOSAL FOR:
Identifying BART-Eligible Sources in the WRAP Region**

See attached pages for terms and conditions and proposal requirements. Prices shall be quoted F.O.B. destination and include delivery to the Western Governors' Association. Bidders should read the entire document before submitting bid. Terms of less than 30 calendar days will not be considered. **BIDS MUST BE SIGNED IN INK.**

TYPED OR PRINTED SIGNATURE

Handwritten signature by Authorized
Officer or Agent of Vendor (in ink)

VENDOR NAME AND ADDRESS

TITLE _____

DATE _____

PHONE # _____

The above bid is subject to Terms and Conditions on attached sheets.

RETURN THIS COPY

PROPOSER COST SUBMITTAL

PROPOSER'S NAME

PROPOSER'S ADDRESS STREET AND NUMBER

CITY

STATE

ZIP CODE

NAME OF AUTHORIZED OFFICIAL (PRINT OR TYPE)

OFFICIAL TITLE

SIGNATURE OF AUTHORIZED OFFICIAL

TELEPHONE NUMBER

E-MAIL ADDRESS

TOTAL COST

RFP TERMS AND CONDITIONS

1. **LATE BIDS/PROPOSALS WILL NOT BE ACCEPTED OR CONSIDERED.** It is the responsibility of the bidder/proposer (hereinafter “bidder” or “proposer”) to ensure that the bid/proposal (hereinafter “bid” or “proposal”) arrives prior to the time and at the place indicated in the bid. Telephone or facsimile responses will not be accepted.
2. Specifications are provided to identify product/service required and to establish an acceptable quality level. Bids on products of equal quality and usability will normally be considered unless otherwise stated. The Western Governors’ Association (WGA) will be the sole judge in determining “equals” in regard to quality, price and performance. Samples of product(s), when required, must be furnished free of expense to the WGA, and, if not destroyed by tests, may upon request at the time the sample is furnished, be returned at bidder’s expense. Failure to furnish brochures, specifications, and/or samples as requested may be sufficient cause for rejection of bids.
3. Bidders shall furnish all the information required and are expected to examine the drawings, specifications, schedule of delivery and all instructions. Should the bidder find any part of the listed specifications, terms and conditions to be discrepant, incomplete or otherwise questionable in any respect, it shall be the responsibility of the bidder to call such matters to the attention of the WGA immediately. Failure to do so will be at the bidder’s risk. All official changes to this bid will be furnished, in writing by the WGA.
4. The bidder shall furnish the products and/or services in strict accordance with the specifications, and at the price set forth for each item. In case of error in extension, the unit price will prevail. All products quoted shall be newly manufactured and of the manufacturer’s current model, unless otherwise specified.
5. Bidders must furnish all Material Safety Data Sheets (MSDS) for any chemicals or hazardous materials. Awards may not be made if MSDS are not received by the WGA.
6. The bid should be returned in an envelope sealed and properly marked as to bid number and opening time and date.
7. No bid shall be withdrawn for a period of less than sixty (60) calendar days subsequent to the opening of the bids, unless otherwise stipulated by the WGA.
8. **Americans with Disabilities Act (ADA) Requirements.** The vendor assures that, at all times during the performance of this contract, no qualified individual with a disability shall, by reason of that disability, be excluded from participation in, or be denied benefits of services, programs, or activities performed by the vendor or be subject to any discrimination by the vendor.
9. **Independent Contractor.** The contractor shall perform its duties herein as an independent contractor and not as an employee. Neither the contractor nor any agent or employee of

the contractor shall be, or shall be deemed to be, an employee or agent of the WGA. Contractor shall pay when due all required employment taxes and income tax withholding, shall provide and keep in force workers compensation (and show proof of such insurance) and employment compensation insurance in the amounts required by law, and shall be solely responsible for the acts of the contractor, its employees, and its agents.

10. Bidder agrees to comply with all applicable federal and state laws, regulations and policies, as amended, including those regarding discrimination and unfair labor practices.

ADMINISTRATIVE INFORMATION

- A. ISSUING OFFICE: This Request For Proposal (RFP) is issued by the Western Governors' Association (WGA). The WGA is the sole point of contact on this RFP.
- B. INVITATION TO SUBMIT PROPOSALS: The WGA is hereby contacting prospective offerors who have an interest or are known to do business relevant to this RFP. All interested offerors who were not contacted are invited to submit a proposal in accordance with the rules, procedures and dates set forth herein. In the event of "No Bid", please sign the Invitation for Bid form, indicating "No Bid," and return it to the WGA.
- C. PURPOSE: This RFP provides prospective offerors with sufficient information to enable them to prepare and submit proposals for consideration by the WGA to satisfy the need for expert assistance in the completion of the goals of this RFP.
- D. SCOPE: This RFP contains the instructions governing the proposal to be submitted and the material to be included therein, including mandatory requirements which must be met to be eligible for consideration.

E. SCHEDULE OF ACTIVITIES:

1.	RFP Published	January 16
2.	Pre-Proposal Conference	January 30
3.	Prospective Offerors' Written Inquiry	January 30
4.	Proposal Submission	February 18
	7 hard copies including original and 1 electronic copy	
5.	Bidder Interviews (option of the WGA)	Week of March 8
6.	Proposal Selection (estimated)	March 12
7.	Contract Finalized (estimated)	Week of March 22
8.	Contract Period	Through December 31

- F. INQUIRIES: Unless otherwise noted, prospective offerors may make written inquiries concerning this RFP to obtain clarification of the requirements. No inquiries will be accepted after the date/time indicated in the Schedule of Activities. Send all inquiries to:

Western Governors' Association
1515 Cleveland Place, Suite 200
Denver, Colorado 80202
Attn: Richard Halvey (rhalvey@westgov.org)

Response to offerors inquiries will be made in writing in a timely manner to all prospective offerors. Any oral interpretations of clarifications to this RFP shall not be relied upon. All changes to this RFP must be in writing to be valid.

- G. MODIFICATION OR WITHDRAWAL OF PROPOSALS: Proposals may be modified or withdrawn by the offeror prior to the established due date and time.
- H. PROPOSAL SUBMISSION: Proposals must be received on or before the date and time indicated in the Schedule of Activities. Late proposals will not be accepted. It is the responsibility of the offeror to ensure that the proposal is received by the WGA on or before the proposal opening date and time. Offerors mailing their proposals shall allow sufficient mail delivery time to ensure receipt of their proposals by the time specified. The proposal package shall be delivered or sent by mail to:

Western Governor's Association
1515 Cleveland Place, Suite 200
Denver, Colorado 80202
Attn: Richard Halvey

The WGA Invitation for Bid form must be signed in ink by the offeror or an officer of the offeror legally authorized to bind the offeror to the proposal. Proposals that are determined to be at variance with RFP requirements may not be accepted. Proposals must be submitted and sealed in a package showing the following information on the outside of the envelope:

OFFEROR'S NAME
RFP-NO.
PROPOSAL DUE DATE AND TIME

- I. ADDENDUM OR SUPPLEMENT TO REQUEST FOR PROPOSAL: In the event that it becomes necessary to revise any part of this RFP, an addendum will be provided to each offeror who received the original RFP. It is the responsibility of offerors, prior to the bid date, to enquire as to addenda issued and ensure their bid reflects any and all changes. The WGA will maintain a register of holders of this RFP. Any party receiving this RFP other than from the WGA should inform the WGA of its interest in order to ensure receipt of any addenda.
- J. BIDDER INTERVIEWS: Offerors who are deemed most qualified after initial evaluation may be asked to interview with the selection committee.
- K. ACCEPTANCE OF RFP TERMS: A proposal submitted in response to this RFP shall constitute a binding offer. Acknowledgment of this condition shall be indicated by the signature of the offeror or an officer of the offeror legally authorized to execute contractual obligations. A submission in response to this RFP acknowledges acceptance by the offeror of all terms and conditions, including compensation, as set forth herein. Any offeror shall identify clearly and thoroughly any variations between its proposal and this RFP. Failure to do so shall be deemed a waiver of any rights to subsequently modify the terms of performance.

- L. PROTESTED SOLICITATIONS AND AWARDS: Any actual or prospective offeror or contractor who is aggrieved in connection with the solicitation or award of a contract may protest to the Executive Director of the WGA. The protest shall be submitted in writing within seven working days after such aggrieved person knows or should have known.
- M. COST DATA/BUDGET: Proposals for \$10,000 or more must include Cost/Data/Budget providing factual information concerning the cost of labor, material, travel, overhead and other cost elements expected to be incurred.
- N. CONFIDENTIAL/PROPRIETARY INFORMATION: Any restrictions on the use or inspection of material contained within the proposal shall be clearly stated in the proposal itself. Written requests for confidentiality shall be submitted by the offeror with the proposal. The offeror must state specifically what elements of the proposal are to be considered confidential or proprietary. Confidential and proprietary information must be readily identified, marked and separated/packaged from the rest of the proposal. Co-mingling of confidential or proprietary information and other information is not acceptable. The WGA will make a written determination as to the apparent validity of any request for confidentiality and send it to the offeror. Neither a proposal in its entirety nor proposal price information will be considered confidential or proprietary. Any information that will be included in any resulting contract cannot be considered proprietary.
- O. RFP RESPONSE MATERIAL OWNERSHIP: All material submitted regarding this RFP becomes the property of the WGA. Proposals may be reviewed by any person after the Notice of Intent to Award letter has been issued. The WGA reserves the right to use any and all information and material presented in reply to the RFP, subject to the limitations outlined in (N), Confidential/Proprietary Information. Disqualification of an offeror does not eliminate this right.
- P. PROPOSAL PRICES: Estimated proposal prices are not acceptable. Best and final offers cannot be considered in determining the apparent successful offeror. All work toward a deliverable task will be billed on a time and materials basis subject to a not to be exceeded budget for each deliverable task or contract. All work will be performed consistent with the schedule specified in the contract.
- Q. SELECTION OF PROPOSAL: All offerors will be notified in writing regarding the results of the RFP evaluation. Upon review and approval of the evaluation committee's recommendation for award, the WGA will issue a Notice of Intent to Make Award letter to the apparent, successful offeror. A contract must be completed and signed by all parties concerned on or before the date indicated in the Schedule of Activities. If this date is not met through no fault of the WGA, the WGA may elect to cancel the Notice of Intent to Make Award letter and make the award to the next most responsive offeror.
- R. AWARD OF CONTRACT: The award will be made to that offeror whose proposal, conforming to the RFP, will be the most advantageous to the WGA, price and other factors considered.

- S. ACCEPTANCE OF PROPOSAL CONTENT: The contents of the proposal of the successful offeror, including persons specified to implement the project, will become contractual obligations if acquisition action ensues. Failure of the successful offeror to accept these obligations in a contract may result in cancellation of the award, and such offeror may be removed from future solicitations.
- T. STANDARD CONTRACT: The WGA reserves the right to incorporate standard WGA contract provisions into any contract resulting from this RFP.
- U. RFP CANCELLATION: The WGA reserves the right to cancel this Request for Proposal at any time without penalty.
- V. WGA OWNERSHIP OF CONTRACT PRODUCTS/SERVICES: Proposals, upon established opening time, become the property of the WGA. All products/services produced in response to the contract resulting from this RFP will become the sole property of the WGA. The contents of the successful offeror's proposal will become contractual obligations.
- W. INCURRING COSTS: The WGA is not responsible for any cost incurred by offerors prior to the issuance of a legally executed contract or procurement document. No proprietary interest of any nature shall occur until a contract is awarded and signed by all concerned parties.
- X. MINORITY PARTICIPATION: It is the WGA's goal to achieve maximum participation of minorities in the procurement process. Accordingly, minority enterprises are to be utilized whenever possible. By the submission of a proposal, the offeror shall agree to utilize the maximum amount of minority business firms that the offeror finds to be consistent with the efficient performance of any resulting contract.
- Y. NON-DISCRIMINATION: The offeror shall comply with all applicable state and federal laws, rules, and regulations involving non-discrimination on the basis of race, color, religion, national origin, age, or sex.
- Z. REJECTION OF PROPOSALS: The WGA reserves the right to reject any and all proposals and to waive informalities and minor irregularities in proposals received and to accept any portion of a proposal or all items proposed if deemed in the best interest of the WGA.
- AA. PARENT COMPANY: If an offeror is owned or controlled by a parent company, the name, main office address, and parent company's tax identification number shall be provided in the proposal.
- BB. NEWS RELEASES: News releases pertaining to this RFP shall not be made prior to execution of the contract without prior written approval of the WGA.

CC: CONTRACT CANCELLATION: The WGA reserves the right to cancel, for cause, any contract resulting from this RFP by timely written notice to the contractor.

DD. CERTIFICATION OF INDEPENDENT PRICE DETERMINATION:

1. By submission of this proposal, each offeror certifies, and in the case of a joint proposal each party thereto certifies, as to its own organization, that in conjunction with this procurement:
 - (a) The prices in this proposal have been arrived at independently, without consultation, communication, or agreement, for the purpose of restricting competition, as to any matter relating to such prices with any other offeror or with any competitor;
 - (b) Unless otherwise required by law, the prices which have been quoted in this proposal have not been knowingly disclosed by the offeror prior to opening, directly or indirectly to any other offeror or to any competitor; and
 - (c) No attempt has been made or will be made by the offeror to induce any other person or firm to submit or not submit a proposal for the purpose of restricting competition.

2. Each person signing the Invitation for Bid form of this proposal certifies that:
 - (a) He is the person in the offeror's organization responsible within that organization for the decision as to prices being offered herein and that he has not participated, and will not participate in any action contrary to (1)(a) through (1)(c) above; or
 - (b) He is not the person in the offeror's organization responsible within that organization for the decision as to the prices being offered herein but that he has been authorized in writing to act as agent for the persons responsible for such decision in certifying that such persons have not participated, and will not participate in any action contrary to (1)(a) through (1)(c) above; and as their agent does hereby so certify; and he has not participated, and will not participate, in any action contrary to (1)(a) through (1)(c) above.

3. A proposal will not be considered for award where (1)(a), (1)(c), or (2) above has been deleted or modified. Where (1)(b) above has been deleted or modified, the proposal will not be considered for award unless the offeror furnishes with the proposal a signed statement which sets forth in detail the circumstances of the disclosure and the head of the agency, or his designees, determines that such disclosure was not made for the purpose of restricting competition.

EE. TAXES: The WGA, as a purchaser designated as a 501(c)(3) organization, is exempt from all federal taxes and from all state and local government use taxes. Seller is hereby notified that when materials are purchased in certain political subdivisions, the seller may be required to pay sales tax even though the ultimate product or service is provided to the WGA. This sales tax will not be reimbursed by the WGA.

- FF. ASSIGNMENT: Except for assignment of antitrust claims, neither party to any resulting contract may assign any portion of the agreement without the prior written consent of the other party.
- GG. AVAILABILITY OF FUNDS: Financial obligations of the WGA payable after the current fiscal year are contingent upon funds for that purpose being appropriated, budgeted, and otherwise made available. In the event funds are not appropriated, any resulting contract will become null and void, without penalty to the WGA.
- HH. INSURANCE: If the proposal so states, the contractor shall procure at its own expense, and maintain for the duration of the work, the following insurance coverages and provide the WGA with certificates as an additional insured.
1. Standard Worker's Compensation and Employers' Liability, as required by State statute, including occupational disease, and covering all employees at a work site.
 2. General Liability (PL & PD) (Minimum)
 - (a) Combined single limit - \$600,000 written on an occurrence basis.
 - (b) Any aggregate limit will not be less than \$1 million.
 - (c) Contractor must purchase additional insurance if claims reduce the annual aggregate below \$600,000.
 - (d) WGA to be named as additional insured on each comprehensive general liability policy.
 - (e) Certificate of Insurance to be provided to the WGA within 10 working days of the receipt of the award.
 - (f) Insurance shall include provisions preventing cancellation without 60 days prior notice by certified mail to the WGA.
 3. Automobile Liability (minimum). The Contractor shall carry a minimum of \$600,000 combined single limit auto insurance.
 4. Additional coverages may be required in specific solicitations.

For any insurances required by this RFP, a completed Standard Certificate of Insurance form shall be provided to the WGA by the contractor prior to the date of any contract.

- II. INDEMNIFICATION: To the extent authorized by law, the contractor shall indemnify, save and hold harmless the WGA, its employees, and agents, against any and all claims, damages, liability, and court awards including costs, expenses, and attorney fees incurred as a result of any act or omission by the contractor or its employees, agents, subcontractors, or assignees pursuant to the terms of the contract resulting from this RFP.
- JJ. VENUE: The laws of the State of Colorado, U.S.A. shall govern in connection with the formation, performance and the legal enforcement of any resulting contract.

Administrative

1. All products/services produced in response to the contract resulting from this RFP will become the sole property of the WGA.
2. Computer code products produced for this project may remain confidential, but WGA will be able to manipulate as needed for this project.
3. The products/services resulting from this contract will not be subject to separate renewal or upgrade fees during the life of the contract.
4. Licenses for proprietary software and other products included as part of the package of products/services resulting from this contract will not be subject to separate renewal or upgrade fees.
5. The successful offeror will provide a warranty provision for the products/services resulting from this contract, for the life of the contract, starting from the date that the project deliverables are fully operational.
6. The capabilities of the project deliverables will be maintained from the date that the project deliverables are fully operational, such that staff turnover is less than 20% per year of the portion of the company or institution routinely operating the project deliverables.
7. The successful offeror may be an individual company, entity, or institution, or may be composed of a team of companies, entities, and/or institutions to handle the development and routine operations portions of this project.
8. No changes to the staffing of the prime and any subcontractors can be made without prior written approval by WGA.

SCOPE OF WORK

1.0 PURPOSE

The purpose of this work is to coordinate the identification of BART-eligible sources in the WRAP region and to provide direct assistance to some WRAP members in identifying such sources. A principal outcome of this effort will be a WRAP-wide database useful for identifying BART-eligible and potentially BART-eligible sources and for tracking their status during the SIP and TIP development process over the next few years. The database may also be useful for other BART-related analyses, such as determining which BART-eligible sources should be subject to BART and the approximate emission reductions that would be achieved from the application of BART. A list of BART-eligible sources and the approximate emission reductions are also important for developing an alternative (e.g., emissions trading) program, since such a program must, at a minimum, include all BART-eligible sources and demonstrate greater reasonable progress than BART.

2.0 BACKGROUND

The Western Regional Air Partnership (WRAP) is a collaboration of tribal governments, state governments, and federal agencies working with industry and environmental groups to develop the technical and policy tools needed by western states and tribes to comply with the U.S. Environmental Protection Agency's (EPA) regional haze rule (40 CFR 51.308-309). Other common western regional air quality issues raised by the WRAP membership may also be addressed. The activities of the WRAP are conducted by a network of committees and forums composed of WRAP members and stakeholders representing a wide range of interests and viewpoints.

A key feature of the regional haze rule is the application of best available retrofit technology (BART) to certain categories of large stationary sources constructed between 1962 and 1977. Specifically, the rule requires each state to (1) identify all BART-eligible sources within the state, (2) determine which of these sources may reasonably be anticipated to cause or contribute to any impairment of visibility in any mandatory Class I federal area and which therefore should be subject to BART, and (3) establish emission limitations and schedules for each source subject to BART based on an analysis of the best system of continuous emission control technology available, the costs of compliance, the energy and nonair quality environmental impacts of compliance, any pollution control equipment in use at the source, the remaining useful life of the source, and the degree of visibility improvement which may reasonably be anticipated to result from the retrofit technology.

The BART provisions of the regional haze rule and the EPA's proposed guidelines for BART determinations (66 Federal Register 38108 – July 20, 2001) are currently being revised by the EPA in response to a U.S. Court of Appeals decision in a case brought against the EPA by the

American Corn Growers Association et al. However, such changes are not expected to affect the need to identify BART-eligible sources, nor the procedures by which they are identified.¹

Also unaffected by the Court decision is an option to states and tribes to implement an alternative (e.g., emissions trading) program in lieu of source-by-source BART. Such a program must include all BART-eligible sources and must demonstrate greater reasonable progress than BART. Thus, whether implementing BART or an alternative program, substantial work is required to establish a basis of BART-eligible sources and the emission (or approximate emission) reductions that would result from the application of BART.

To help plan the work described above, WRAP staff performed an informal survey of state and tribal members. Three to five states (AK, CA, WA, and possibly AZ and WY) expressed an interest in receiving direct contractor support for identifying BART-eligible sources. Several other states have made or are in the process of making preliminary determinations of BART-eligible sources within their states. Some of these states are interested in having a contractor verify their results, and most WRAP members have indicated an interest in a regionally-coordinated approach to identifying BART-eligible sources and in conducting future BART-related work. Hence, the contractor would be expected to provide both types of support (regional coordination and source identification) to the WRAP. Further details regarding the survey are provided in **Attachment 1**.

WRAP staff used the WRAP's 1996 stationary source inventory to identify the universe of potentially BART-eligible sources. Sources were identified by querying the WRAP database for records (i.e., emission units) within the WRAP region (including NV but not AK) and with source category codes (SCCs) or standard industrial classification (SIC) codes typically associated with one or more of the 26 BART categories listed in the Clean Air Act. Then, sources (i.e., plants) which emit 100 tons or more per year of any visibility-impairing pollutant (SO₂, NO_x, PM₁₀, VOC, and NH₃) from its category-eligible units were identified. This process identified 497 potentially BART-eligible sources containing 10,413 category-eligible emission units belonging to 36 major (i.e., 3-digit SCC) source categories. The largest 12 categories account for approximately 99 percent of the emissions from potentially BART-eligible sources, with utility and industrial boilers accounting for about 75 percent. Emissions from all 10,413 units account for 92, 76, 64, 33, and 87 percent, respectively, of the SO₂, NO_x, PM₁₀, VOC, and NH₃ stationary source emissions. These percentages are likely to decrease significantly as many sources are expected to be found not BART-eligible on the basis of their operational and existence dates, potential to emit, and miscellaneous categorization issues. This analysis is further described in **Attachment 2**.

The analysis described above identified some issues and obstacles in identifying BART-eligible sources. These are likely to include the following:

- Categorization of Units and Plants – SCCs and SIC codes are only an indicator of a unit's eligibility under one of the 26 BART categories. The categories were not chosen on the basis of SCCs and SIC codes, or vice versa, so there is not a completely definitive set of

¹ Some minor exceptions might be the way in which emissions from non-electric generating industrial boilers are aggregated and how modifications and reconstructions are considered in determining BART-eligibility.

codes to identify category-eligible units. Although a fairly thorough list of codes was used in the analysis in Attachment 2, some eligible units (and to a lesser extent plants) were found to be not captured, and some captured units were not likely to belong to one of the 26 categories. Self reporting of SIC codes by emission sources and discrepancy within state and local agencies in applying any one of thousands of SCCs to each unit adds to the potential for misidentification. Finally, aside from these issues, categorizing complex facilities or units within the facilities can be an ambiguous and subjective process, especially where a variety of products and/or byproducts are produced and where products and processes change over time. Examples include lime kilns at sugar beet plants and sulfuric acid production at citric acid plants.

- Operation and Existence Dates – According to the Clean Air Act, a source can only be BART-eligible if it began operation after August 7, 1962 and was in existence before August 7, 1977. The EPA defines “operation” as engaged in activity related to the primary design function of the source. “In existence” means that the owner or operator has obtained all necessary preconstruction approvals or permits required by federal, state, or local air pollution emissions and air quality laws or regulations and either has (1) begun, or caused to begin, a continuous program of physical on-site construction of the facility or (2) entered into binding agreements or contractual obligations, which can not be canceled or modified without substantial loss to the owner or operator, to undertake a program of construction of the facility. The difficulty here is determining operational and existence dates of emission units installed up to 40 years ago, and at facilities which may have changed names and ownership. These data may not be available electronically and may tend to reside in permit application files. Dates provided in these applications are not necessarily operational and existence dates, as defined above, but probably more generic “installation” dates, which may be open to the interpretation of the applicant. Moreover, specific dates are not usually given, so an installation date of “1977” is not sufficient to determine if it was installed prior to August 7, 1977. And even if it was installed in 1978, it may have been in existence, according to the definition above, prior to August 7, 1977. In fact, the time elapsed between contractual obligations and completion of installation can be up to two years for large units such as utility boilers. For this reason, the MANE-VU regional haze planning organization decided to flag units as “maybe BART-eligible” if the dates provided were between 1960 and 1979, and such an approach may be appropriate in this project.
- Reconstructed and Modified Sources – A unit is considered reconstructed if the fixed capital cost of the new component exceeds 50 percent of the fixed capital cost of a comparable entirely new unit. According to draft EPA guidance, units in operation before August 7, 1962 which are reconstructed during the August 7, 1962 to August 7, 1977 period are BART-eligible. Likewise, a unit constructed during the 1962 to 1977 period which was reconstructed after August 7, 1977 is not BART-eligible. Modifications, however, which are defined by a lower threshold of any change of operation that leads to an increase in emissions, would not affect the BART-eligibility of a unit under the draft EPA guidance. Again, the difficulty here may be identifying if and when a modification took place and whether it was large enough to qualify as a

reconstruction.

- Potential to Emit – According to the Clean Air Act, a source must have a potential to emit (PTE) of 250 tons per year or more of any single visibility-impairing pollutant to be BART-eligible. The availability and accessibility of this information may vary from state to state, and it may not be clear if a PTE accounts for physical and operational limitations, including emission control devices and federally-enforceable conditions, such as the material processed, the hours of operation, etc. However, since Title V permitting programs require sources with a PTE of 250 tons per year (or smaller in some cases) to seek a permit, a source’s appearance within a Title V program can serve as a confirmation or indicator that it is potentially BART-eligible.
- Availability and Accessibility of Information – As alluded to above, the availability, format, and accessibility of the information needed to determine BART-eligibility may be poor in some states and tribes and is likely to be inconsistent among states and tribes to some extent. Moreover, local agencies often have delegated permitting authority, so the information may not be available at a single source within the state. This is known to be the case in CA (with 35 local air districts) and WA (with 7 local air districts) and is a major reason why these states are interested in contract support to identify BART-eligible sources. In MANE-VU’s experience, dates and potential emissions are sometimes not provided or are listed as insignificant on permit applications. In one case, a source with many “insignificant” emissions was initially identified as not BART-eligible but later determined as BART-eligible when specific emissions were provided and summed across the many units.
- Emissions Data for NH₃ and Other “Attainment” Pollutants – In MANE-VU’s experience, potential emissions data may sometimes be of less quality or missing for pollutants that are not violating or have never violated the national ambient air quality standards in the area where the source is located. Since there is no ambient standard for NH₃, the data quality for NH₃ is likely to be less than that of other pollutants. It is, however, regulated under state air toxics programs, which may have additional and better information on NH₃ sources and PTEs than Title V permits.

3.0 WORK TASKS

Task 1: Establish points of contact in each state and, where applicable, each tribe.

Tribal contacts may be determined through state contacts and/or tribal organization contacts (e.g., NTEC and ITEP). Tribal contacts should be from tribes on which BART-eligible sources are likely to be located. Points of contact may also be necessary for local air pollution control districts, especially where they are the permitting authority for potentially BART-eligible sources. As with tribal contacts, these contacts may be identified through state contacts and/or other organizations (e.g., WGA and EPA regional offices).

Task 2: Identify which jurisdictions (state, local, and tribal) have developed or are in the process of developing their own list of BART-eligible sources.

Task 3: For the jurisdictions identified in Tasks 2, document the procedures used to identify BART-eligible sources and obtain the list of sources.

The documentation should identify and summarize uncertainties and issues that each jurisdiction has noted in its BART-identification process. The documentation should also compare the procedures used across jurisdictions and identify any inconsistencies which may result in a source being classified differently if it were located in a different jurisdiction.

The list of sources obtained from the agencies should contain as much primary and ancillary information as available from the agencies. Primary information (e.g., potential emissions) would be used directly to determine BART-eligibility. Ancillary information could be used to support the BART identification process or could be used in future BART-related work (e.g., using information on current emission controls to determine if BART levels have already been achieved).

Task 4: Based on the findings of Task 3 and EPA guidance for identifying BART-eligible sources, establish a procedure for identifying BART-eligible sources in the remaining jurisdictions. The remaining jurisdictions should be provided an opportunity to review the procedure, and the procedure should be amended where appropriate based on this review.

Note, an optimal approach may differ from the approach followed in individual states. For example, although the basic steps in identifying BART-eligible sources is provided in EPA guidance, states identifying BART-eligible sources on their own may rely on their own emission inventories to identify candidate sources, whereas a multi-state approach for states with few resources to commit to this project might be better served by using the EPA's National Emission Inventory (NEI) to identify candidate sources. MANE-VU (the WRAP's counterpart for the northeast states) has taken a regional approach to identifying BART-eligible sources and supplemented its NEI-based list with an examination of the EPA's AIRS/AFS database for boilers and ammonia sources that may not have been included in the NEI. MANE-VU also contacted state air toxics programs for potential ammonia sources. A copy of the MANE-VU report is available at <http://www.nescaum.org/committees/haze.html> (see Technical Memorandum #6).

Task 5: Design a WRAP-wide BART-source database.

The database will be used primarily to identify BART-eligible sources and to track the status of BART-eligible and potentially BART-eligible sources² in the WRAP region. Its design should take into consideration the findings in Tasks 3 and the data and procedural requirements identified in Task 4. It should also take into consideration

² Potentially BART-eligible sources, for example, could be those for which operational dates, existence dates, or potential emissions are unclear.

potential future uses of the database – e.g., to determine which eligible sources should be subject to BART and what emission rates would result from the application of BART. It is anticipated that the database should contain at least the following elements on a unit- (not source-) specific basis, not all of which necessarily must or can be populated within project resource and time constraints:

- a. Source name
- b. Source location (latitude and longitude)
- c. Plant ID (typically assigned by the state or local agency)
- d. Unit ID (typically assigned by the state or local agency)
- e. Designation of whether the unit is clearly or potentially category- and date-eligible³
- f. BART category
- g. Source Category Code (SCC)
- h. Standard Industrial Classification (SIC) code
- i. Potential to emit VOCs, NO_x, SO₂, PM₁₀, and NH₃
- j. Actual emissions of VOCs, NO_x, SO₂, PM₁₀, and NH₃
- k. Year upon which actual emissions are based
- l. Pollution limits, controls in place, and/or overall control efficiency (see U.S. EPA National Emission Inventory Input Format for control codes, etc.)
- m. Notes / comments

Among other things, the database will be used to:

- Sum each source's potential and actual emissions for each pollutant across all clearly-eligible units,
- Sum each source's potential and actual emissions for each pollutant across all clearly-eligible and potentially-eligible units, and
- Determine whether each source is clearly or potentially BART-eligible.

Before designing an independent database, the contractor shall examine the Emissions Data Management System (EDMS) under development by the WRAP and consult with its developer regarding its ability to serve the needs of this project and future BART-related work. It may be more cost effective and reliable for the WRAP's BART information to be stored in the EDMS than separately. Information on the EDMS can be found at <http://www.wrapair.org/forums/ef/docs.html>

Task 6: Populate and maintain the BART-source database.

This task is at the heart of this project and will likely require the most effort. First, the BART-source database should be populated with the list of sources and primary and ancillary information obtained in Task 3. Then, the contractor must work with the remaining jurisdictions and points of contact identified in Task 1 to identify BART-

³ Units that are clearly NOT category- or date-eligible do not need to be included in the database since they would not be subject to BART and would not be required to be included in the basis for establishing the applicability and minimum control level for an emission trading program or other alternative to BART.

eligible and, where appropriate, potentially BART-eligible sources. Sufficient documentation should be collected and maintained to sustain future justification. This task may require visitation to agency offices and examination of Title V databases, permit applications, and/or permits to obtain installation dates, emission potentials, unit-specific controls, etc.

Task 7: Treatment of California sources.

California poses a unique challenge to this project because it may contain a large number of BART-eligible sources, the vast majority of which are probably already controlled at levels equivalent to or better than BART. In addition, permits for stationary sources (including installation dates and potential emissions) are maintained independently at each of California's 35 air pollution control districts.

Two approaches should be considered for California sources – an approach similar or identical to the procedure established in Task 4 and a “control analysis approach” which examines the stringency of current pollution control limits on all BART categories. Since the primary purpose of identifying BART-eligible sources is to provide a basis for determining which of these should be subject to BART, a determination that all BART categories are already controlled at levels equivalent to or better than BART would make irrelevant any explicit identification of BART-eligible sources.⁴ Additional information on a “control analysis approach” is provided in **Attachment 3**.

Task 8: Submit a draft and final report.

Four weeks should be provided for WRAP participants to review and comment on the draft report. A final report should be submitted two weeks after comments are received. The report should be a relatively concise summary of the procedures followed and results obtained in Tasks 1-7. Background and support documentation – such as notes, correspondences with facility operators, copies of relevant portions of permits, etc. – should be available as appendices or technical support information. The report and database should be developed in a way that anticipates future use of these resources by WRAP members to resolve outstanding issues pertaining to BART-eligible and potentially BART-eligible sources.

4.0 SCHEDULE AND DELIVERABLES

A draft report and background/support documentation should be submitted by September 30, 2004. A final report and background/support documentation should be submitted six to eight weeks later, depending on the extent and duration of review by WRAP participants. Interim milestones may be proposed by the bidder in the proposal.

⁴ The only other reason for identifying BART-eligible sources would be to comply with Section 308(e)(2), which allows states to implement an alternative to BART provided it demonstrates greater reasonable progress. The alternative (e.g., an emissions trading program) must include BART-eligible sources within the program. However, the program could be designed to include all BART-eligible sources without necessarily identifying them a priori.

5.0 THE PROPOSAL

Any response to the RFP must be submitted in two parts:

A. Task completion requirements. Proposals should indicate the level of effort required, the approach to be taken (including examples of the potential formats for the final products), and include an estimate of hours and cost by task in tabular format.

B. Related experience. Successful bidders will have demonstrated expertise with the development of other data management systems, especially related to air quality and/or emissions data.

Proposal responses are limited to 25 pages, exclusive of key staff resumes and budgets. Seven (7) copies of each proposal and one (1) electronic copy must be supplied. The electronic copy may be submitted either with the proposal response or by e-mail in Adobe Acrobat PDF format and should be exactly as the hard copy.

5.1 Anticipated Cost

The WGA is specifying an available upper limit of \$100,000 through December 31, 2004.

5.2 Amendments to the RFP

The WGA reserves the right to issue amendments in the form of addenda to this RFP prior to the date for proposal submissions. All persons known by the WGA to have received the RFP will be sent any and all amendments. Failure to acknowledge receipt of the amendments in accordance with the instructions contained in the addenda may result in proposals being rejected. The WGA will allow a reasonable time for the acknowledgment of receipt following issuance of the amendments.

The WGA reserves the right to issue amendments after the date of proposal openings. All persons submitting proposals will be sent any such amendments. The failure to acknowledge receipt of amendments provisions stated in the previous paragraph will apply to post-opening amendments as well.

5.3 Submission of proposal

All proposals must be received by the WGA, 1515 Cleveland Place, Suite 200, Denver, CO 80202 on or before February 18, 2004, 4:00 P.M. MST. The proposals will be publicly acknowledged at that time. Acknowledgment of the proposers' submission will occur on February 20 or as soon as possible thereafter.

Telephone, telegraph, e-mail, or fax proposals will not be accepted in lieu of the hard copy submission. A late proposal will not be eligible for consideration and will be

returned unopened, with notification of the reason for its refusal. Proposers must submit their cost proposal, rounded to the nearest dollar, on the proposal form that accompanies this RFP and sealed in an envelope.

5.4 Modification of Proposal

Proposal modification by amendment will be accepted on conditions that:

- 1) The amendment arrives before the deadline for proposal submittal;
- 2) The amendment is in writing and signed by the proposer; and
- 3) The proposal, as amended, conforms in all aspects to the requirements in this RFP.

5.5 Withdrawal of Proposal/Mistakes in Bid

A proposal may be withdrawn at any time prior to the proposal opening.

5.6 Disqualification of Proposers

The WGA reserves the right to reject any and all proposals in writing, before or after the opening, for evidence of conditions including but not limited to collusion with intent to defraud or other illegal practices on the part of the proposer.

5.7 Non-Conformance

Any proposal that does not conform to all of the requirements of the RFP may be rejected. The WGA will so notify the affected proposer in writing of the rejection and the reason for the rejection.

5.8 Statement of Financial Condition

A firm shall provide a statement regarding its financial viability. All proof is subject to review by the WGA and acceptance or rejection is at the discretion of the WGA.

The WGA reserves the right to ask for additional information concerning financial responsibility. If a proposer unreasonably fails to provide such information, the WGA may find the proposer to be non-responsive.

5.9 Related Experience Statement

The proposal must contain a proposer's experience statement as described below:

- 1) The proposer must provide a list of previous and current contracts of a similar nature, if any, which were awarded to the proposer by a governmental agency and/or the

private sector. The statement should provide details on its management ability as well as its technical expertise and a listing of its projects and accomplishments.

- 2) The proposer must include the following in each list described above:
 - a. Contract duration, including dates;
 - b. Geographic area served; and
 - c. Name, address, and telephone number of the contracting agency which may be contacted for verification of all data submitted.

5.10 Proposers Conference/Questions and Answers

A proposers telephone conference will be held at 12:00 P.M. Mountain Standard Time on January 30, 2004. The call in number is 312-461-9324, access code 107912.

The WGA will accept written questions through the close of business January 30, 2004. The WGA will provide written answers to all written questions as expeditiously as possible to all persons and entities known to have received this RFP. The responses to questions will become a part of the RFP.

Any corrections or necessary revisions that are identified will result in a formal amendment to this RFP, which will be provided to all persons and entities known to have received this RFP.

5.11 Evaluation of Proposals

An evaluation team will be established to evaluate all proposals in accordance with the evaluation factors stated in this RFP. After the initial review of the proposals by the evaluation committee, the proposers may be asked to make an oral presentation in support of their proposals. It is likely that the oral presentation will be done by telephone conference. Upon final consideration, the evaluation team will make a recommendation to the Executive Director of the WGA. The Executive Director will make the final decision.

The evaluation team is responsible for developing a final ranking of each proposal and recommending that the proposer with the best score be awarded the contract. In this capacity, the committee will:

- 1) Rate each proposal on the criteria; and
- 2) Develop a final ranking of each proposal with a narrative that addresses pertinent points and issues.

Proposals will be evaluated based on the following criteria:

- 1) The ability to provide sound technical support;
- 2) Experience with similar projects;
- 3) Personnel qualifications;
- 4) Availability and support of management;
- 5) Completeness and clarity of the proposal;
- 6) Cost;
- 7) Schedule; and
- 8) Offers of in-kind (no cost to the WGA) services from the bidder's organization, which will be reviewed under established WGA procedures

5.12 Award of Contract

The contract shall be awarded to the responsible proposer determined to be the most advantageous to the WGA based on the evaluation factors set forth in Section 5.11 of this RFP. After proposals are opened, meetings may be held with the proposers determined to be the most responsive. Discussion may be held to clarify requirements and to make minor adjustments in services to be performed and in related costs. Any change to the proposal shall be submitted/confirmed in writing by the contractor.

Before an award can be made to a proposer, the WGA reserves the right to reject any and all proposals or waive any minor nonsubstantive irregularity in proposals received. Upon selection of a proposal, the WGA will issue a Letter of Intent specifying a date by which a contract must be executed.

In the event the proposer the evaluation committee has determined to be the most advantageous withdraws their proposal, the award shall be given to the next declared most advantageous proposer as determined by the evaluation committee.

5.13 Contract Duration and Renewal

The WGA intends to sign the contract within 30 days or as soon as possible after notification to the successful proposer. The provisions of the contract will remain in force for a period not to exceed December 31, 2004.

5.14 WGA Preference

Any or all proposals may be rejected in whole or in part if the executive director determines in writing that such action is in the WGA's best interest.

5.15 Confidentiality

The contents of all proposals, correspondence, working papers, and any other medium that discloses any confidential aspect of the proposal shall be held in the strictest confidence until notice of intent to award.

All proposals will be publicly opened. A register of proposals will be developed by the evaluation committee, providing a proposer name and description of that proposal. This register of proposals will be made public only after the contract is awarded. Confidential information submitted with proposals shall be readily separable and accompanied by a written request of confidentiality.

6.0 PRIME CONTRACTOR RESPONSIBILITIES

If the proposal includes services supplied by other contractors, it will be mandatory for the successful proposer to identify them and to assume responsibility for their performance.

6.1 Subcontracting

The Contractor's use of subcontractors shall not diminish the Contractor's obligations to complete the work in accordance with the contract. Each contractor shall control, coordinate, and be responsible for the work of subcontractors. The contractor shall be responsible for informing all subcontractors of all terms, conditions, and requirements of the contract. The WGA reserves the right to approve all subcontractors prior to their assumption of duties on behalf of the contractor. The contractor shall forward to the WGA a listing of each designated subcontractor that indicates their purpose or area of participation.

6.2 Patent and Copyright Infringement

The contractor shall defend, protect, and save harmless the WGA, its officers, agents, and employees against all suits at law or in equity and from all damages, claims, or demands for actual or alleged infringement of any patent or copyright by reason of the contractor's use of any equipment or supplies in connection with the contract.

6.3 Conflict of Interest

The contractor and/or subcontractors must affirm in writing that he/she currently has no interest and shall not acquire any interest, direct or indirect, which would pose a conflict of interest in any manner or degree with the performance of services required by this RFP for the life of the contract.

7.0 CONTRACT GENERAL TERMS

A proposer's response to this RFP shall be considered as the proposer's formal offer. The WGA reserves the right to negotiate additional contract terms within the scope of the RFP. The signing of the contract by the WGA shall constitute the WGA's written acceptance of the successful proposal.

ATTACHMENT 1

**Summary of Results of an Informal Survey of WRAP Members
to Determine Their Interest in Receiving Contractor Support
for BART-Related Work**

State	Response
AK	We do not know how many sources are clearly BART-eligible. In 2001, we identified 21 sources as potentially BART-eligible (Alaska Regional Haze Strategy). Sufficient information exists within the agency, but it would be time-consuming to glean this information from our permit records. In our estimate, it takes about four days of staff time per source. The Department would welcome assistance ascertaining which of the potential installations are clearly BART eligible and determining the appropriate BART control levels.
AZ	We have not yet estimated the number of sources that are clearly or potentially BART-eligible. We believe that we have sufficient information within our agency to make eligibility determinations for all sources within our jurisdiction. [<i>Note: May not include sources in Pima and Maricopa counties.</i>] We believe that obtaining and evaluating the needed information for the sources will be a timely project. We estimate a minimum of one month for this project. The project is well within the ability of our agency to undertake. However, if there is assistance available we may like to take advantage of the opportunity and we think it is important to coordinate with the WRAP members.
CA	We have no idea how many sources fall into the BART “time window” and suspect it could be quite a few. Whether or not they are controlled at BART levels (or better) is a different story, but if we were to do a source-by-source review, the effort would be far more rigorous than the amount of eligible reductions we would be likely to find. ARB does not have sufficient information to determine BART eligibility. Local districts have that information, and we are unsure about the quality of the records, especially at some of the smaller districts, many of which are close to or encompass the Class I areas. We believe it may take about six months to determine BART-eligible sources since it would require each district to do the research and they would have to do a permit file search of their sources and eligible processes. We would greatly appreciate assistance with this project. Once the sources are identified, we believe we will discover that most are already controlled at BART levels or better. However, those that are not would probably go through the CA retrofit program.
CO	In prior WRAP work for the Annex, we identified 18-20 BART-eligible sources on the basis of SO ₂ emissions. However, after considering other pollutants, we now have a list of 50 sources that MAY be BART-eligible based on magnitude of emissions. We are sending letters to all these sources to determine the age of the facility and/or changes to the operation. Our records are insufficient for determining BART-eligibility, especially for older sources and for sources which may have modified or reconstructed equipment during the BART time window. Our letter of request to the sources will specifically ask that question of each source. Just to develop the list of potential candidates cost us about 1 FTE. Several interns worked on this project as well

	as a number of other staff members. To complete the whole process will take a number of extra FTEs – i.e., shepherding and evaluating the BART analysis, changing rules, etc. At this point, we are not seeking contractor support to identify BART-eligible sources in our state, but assistance with future BART work may be welcome.
ID	We have identified Amalgamated in Twin Falls, Paul and Nampa as BART sources. Potlatch paper company in Lewiston, JR Simplot Don Plant in Pocatello and Agrium (Nu-West) in Soda Springs are also thought to be BART sources - total of six. That should be about it, but it wouldn't hurt to have a second pair of eyes to look through emission inventories and permits to confirm and assure there aren't other potential sources. We believe the emission inventory and permit information within our agency is sufficient to determination BART eligibility. There have been some modifications at the Simplot Plant, which will require further investigation. We would appreciate assistance with all our BART-related work. It will be a contentious issue, so having a consultant or outside source confirm our findings would provide an atmosphere of fair-play. Also, using a consistent methodology across the region will reduce the likelihood of unequal treatment among sources and provide a more level playing field.
MT	We have two sources that are clearly BART-eligible (Colstrip PP Units 1+2 and Corrette PP, both in the Billings area), one that we are still looking at (aluminum smelter southwest of Glacier NP). We have asked the company for some answers to questions we had. We have received those answers and will be examining them very soon. At this time, we believe we will have adequate information to determine BART-eligibility. However, we may want some assistance with a source we think may be BART-eligible. We have reconstruction questions that can make a difference about whether it qualifies. Without further guidance from EPA we feel a little stumped at this point. Perhaps if we see what other states are doing or seek outside opinion, we may get a clearer picture. It should only take a couple days to make a final decision. We don't feel we need much assistance identifying BART-eligible sources, but we think we would like assistance determining BART or BART-equivalent emission reductions.
NV	We only have a handful of BART-eligible sources in Nevada (as well as potential BART-eligible sources). We also believe we have enough information here at our agency to make these determinations. We don't know if we will need assistance determining BART and/or BART-equivalent emission reductions.
NM	We have already identified a preliminary list of BART-eligible sources but believe a regionally-coordinated approach is important and may resolve, if not make consistent some interpretation issues.
ND	We have identified 7 BART-eligible and 2 potentially BART-eligible sources. We have sufficient information at our agency to determine eligibility. The issue of aggregating the heat input of multiple boilers at a facility needs a final determination before a final list of BART-eligible sources can be prepared. The level of effort to identify BART-eligible sources has been about 5 days. We do not need assistance at this time, but foresee a need for assistance with future BART work, especially for power plants.
OR	No response available yet.
SD	We are close to determining BART-eligible sources and do not need any additional assistance.
UT	With the exception of NH3 (for which we have no inventory), we believe we have

	<p>identified all our BART-eligible sources are, but it would be valuable to have a contractor review our list/process. We used the inventory as a screening process, and then reviewed the permits and case files for these sources to determine whether they met the criteria. We don't have a lot of sources in Utah, otherwise this methodology would not have been feasible. We only identified 2 BART eligible sources (Hunter and Huntington power plants). There may possibly be one additional source depending on how the final guidelines aggregate units at a source to determine eligibility. Finally, if we have to do case-by-case BART for NOx and PM, we think A WRAP effort involving the air quality modeling could be very helpful.</p>
WA	<p>Based on a preliminary examination of our emissions inventory and personal knowledge of installation dates, we have estimated that approximately 25 BART-eligible sources exist in our state. However, we do not have sufficient information in-house to make adequate determinations. That information is stored at 10 different locations among 7 local agencies within the state. We estimated that 2-3 months or equivalent number of working days will be needed to complete the identification work. We would welcome assistance identifying BART-eligible sources and determining BART (or equivalent) control levels.</p>
WY	<p>We haven't yet worked on identifying BART-eligible sources, with the exception of SO2 sources. We guess that there may be many BART-eligible sources, perhaps involving hundreds of units. We probably have sufficient information to determine BART-eligibility starting in 1974, when our permitting program began, but the period of 1962 through 1974 will probably be more difficult to reconstruct. We probably spent 2-3 weeks identifying SO2 BART-eligible sources. It will probably take at least twice as long (guessing 10-12 man-weeks) to identify sources which are BART-eligible on the basis of other pollutants. We have concerns about how useful contractor assistance would be for BART identification. Our concern is that the contractor would utilize Wyoming staff time at rate that would likely be comparable to us doing the work ourselves. Although we would probably like WRAP help in this process, that help will have to be carefully structured to assure that it really does provide some "service". Wyoming envisions that an emissions trading program will likely prove more cost effective than applying case-by-case BART, and we would like to work with the WRAP to develop that program for the region.</p>

ATTACHMENT 2

Potentially BART-Eligible Sources in the WRAP Region: Sources Belonging to One of the 26 BART Categories and Emitting at Least 100 tpy of Any Visibility-Impairing Pollutant (1996)

Contact Lee Alter with questions or requests for more information:

lalter@westgov.org

520-628-3173

Purpose

This analysis was performed to identify potentially BART-eligible sources in the WRAP region, including NV but not AK.⁵ The list of sources identified (497 plants) can be used by states and tribes as a starting point for more definitively identifying BART-eligible sources within their jurisdictions. For states and tribes that have already identified BART-eligible sources, it can be used to verify their process and/or results. Finally, the list of potentially BART-eligible sources may be useful for contractor planning purposes as the WRAP develops a regional BART database.

Summary of Procedure, Limitations, and Caveats

In brief, the procedure used to identify potentially BART-eligible sources relies on the WRAP 1996 stationary source emissions inventory. First, category-eligible emission units are identified according source category codes (SCCs) and standard industrial classification (SIC) codes typically associated with one or more of the 26 BART categories listed in the Clean Air Act. Then, sources are identified on this list which emit 100 tons or more of any visibility-impairing pollutant (SO₂, NO_x, PM₁₀, VOC, and NH₃) when summed across all category-eligible units at the plant. The 100-ton threshold is used as a surrogate for a potential to emit (PTE) of 250 tons, which is the threshold defined in the Clean Air Act.

The resulting list of sources should include nearly all BART-eligible sources, plus many additional sources which may have been constructed outside the 1962-77 eligibility period, or which may have a PTE less than 250 tons. (Neither type of information is available in the WRAP emissions inventory.) These will be the largest causes of over-capturing sources. However, there are some other features of the data which may cause a smaller degree of over-capturing or under-capturing of sources. These features are explained below:

- It is not clear how state and local agencies defined emission units as belonging to a given plant ID. Thus, it may be possible that an emission source, as defined by EPA regulations, may be given two or more plant IDs in the stationary source inventory, or

⁵ Potentially BART-eligible sources in AK could not be determined because the current version of the WRAP stationary source inventory does not include sources in AK. However, the AK Department of Environmental Conservation has made a preliminary identification of 21 potentially BART-eligible sources, available in its regional haze strategy: <http://www.state.ak.us/local/akpages/ENV.CONSERV/dawq/aqi/anpms/Main%20Pages/rh/rhhome.htm>

vice versa. This may lead to some units/plant being erroneously captured or erroneously not captured.

- Various units or plants may erroneously not have been captured or not have been captured because the actual emissions in 1996 were low due to repairs, low product demand, etc. So, they may have emissions > 100 tpy in most other years, but not captured through an analysis of the 1996 inventory.
- Some mines, or units/processes at mines, may be erroneously captured because the SCC used to identify the BART category of “coal cleaning plants (thermal dryers)” includes many other mining operations, which are probably not BART-eligible.
- Some units/plants may be erroneously captured by the presence of Claus sulfur recovery units (SCC= 301003203, chemical manufacturing; elemental sulfur production; mod. Claus: 4 stage w/o control [96-97% removal]). These units are actually used as emission control devices, but coded under 3-01-xxx-xx, which stands for chemical manufacturing and is used as the surrogate for the BART category of “chemical process plants”.
- Various units or plants may erroneously not have been captured because of conventions used or mistakes made by state and local agencies when assigning SCCs to emission sources. The same effect may result from the ways in which sources report their SIC codes.
- Various units (but to a lesser extent plants) may erroneously not have been captured because of missing SIC codes. Generally speaking, the SCCs are more descriptive of the emissions unit/process, but the SIC code is more general and more likely to capture all units, for example, at a refinery, where some of the many units may have been given SCCs that do not fall under 3-06-xxx-xx. Details on how this was handled are provided below in Step 3 of the Procedures for Identifying Sources.

Procedure for Identifying Sources

1. Sources of data include the latest available WRAP stationary source emissions inventory (Version 3, 2/28/03) and the latest available SCC definitions available from on the EPA’s website (April 2002 version).
2. Identify Sources in the WRAP Region – Using Microsoft Access, the WRAP inventory (which includes NV but not AK) was queried for records (i.e., emission units) located within the WRAP states. Functions were included in the query which produced new fields containing substrings of the full SCC and SIC code. For instance, a new field was created containing the first two digits of the four-digit SIC code. Similarly, new fields were created containing the first three and first six digits of the SCC. This was done for reasons explained below in step 3.
3. Identify Category-Eligible Units – The table created in Step 2 was queried for records containing SCCs, SIC codes, partial SCCs, or partial SIC codes indicating that the emission

unit belonged to one or more of the 26 BART categories identified in the Clean Air Act. Previous work by the Midwest RPO, MANE-VU, and VISTAS has identified SCC and SIC indicators of the BART categories, and their work was briefly reviewed prior to use in this analysis. A couple of codes, or partial codes, were listed by some RPOs which were not listed by others. Such codes were included in the query such that a composite, inclusive list of codes was developed for this analysis. This list of codes ultimately used is shown below.

	BART Category	SCC	SIC
1	Fossil fuel-fired steam electric plants > 250 MM BTU per hour	101xxxxx	4911
2	Coal cleaning plants (thermal dryers)	305010xx	1100, 2999
3	Kraft pulp mills	307001xx	2611, 2621, 2631
4	Portland cement plants	305006xx, 305007xx	3241
5	Primary zinc smelters	30303002	33xx, 3339
6	Iron and steel mill plants	303015xx	3312, 332x
7	Primary aluminum ore reduction plants	303001xx	3334
8	Primary copper smelters	303005xx	3331
9	Municipal incinerators capable of charging > 250 tons of refuse per day	501001xx, 502005xx	4953
10	Hydrofluoric, sulfuric, and nitric acid plants	301070xx	2819, 2899
11	Petroleum refineries	306xxxxx	2911
12	Lime plants	305016xx	3274
13	Phosphate rock processing plants	305019xx	1429, 1475
14	Coke oven batteries	303003xx, 303004xx ^(a)	3312
15	Sulfur recovery plants	30603301, 31000208	2819
16	Carbon black plants (furnace process)	30100509, 30100503	2895
17	Primary lead smelters	303010xx	3339
18	Fuel conversion plants	n/a	n/a
19	Sintering plants	n/a	n/a
20	Secondary metal production facilities	304xxxxx	3341, 334x
21	Chemical process plants	301xxxxx	2899, 28xx
22	Fossil fuel-fired boilers > 250 MM BTU per hour	102001xx through 102007 103001xx through 103007	n/a
23	Petroleum storage and transfer facilities with a capacity > 300,000 barrels	306xxxxx	5171
24	Taconite ore processing plants	303023xx	1011, 3295
25	Glass fiber processing plants	305012xx	32xx
26	Charcoal production facilities	301006xx	2819, 2861

^(a) This SCC was later added to the list when it was discovered that a coke manufacturing unit (bee hive process, SCC=303004xx) was not captured by the query in this step.

It was later discovered that, ideally, some additional SCCs should have been included in the lists developed by the RPOs. For example, a portland cement plant may contain units with an SCC of 3-90-002-01, which stands for Industrial Processes; In Process Fuel Use; Bituminous Coal; Cement Kiln/Dryer. This code lies outside the general group of codes commonly used to described emission units/processes at cement kilns – i.e., 3-05-006-xx,

which stands for Industrial Processes; Mineral Products; Cement Manufacturing; etc. However, for the vast majority of cases, it appears that the SIC codes are sufficiently broad to capture all units at portland cement plants, and for that matter refineries, lime plants, and other types of facilities. For instance, records for several portland cement plants were manually inspected, and it was found that nearly every unit had an SIC of 3241. Hence, while SCCs are more descriptive of the emissions unit or process, SIC codes ensure more complete capture of units and plants that could be BART-eligible.

Given the importance of SIC codes in building a complete list of potentially BART-eligible sources, the WRAP inventory was examined for SIC code completeness. The results are shown below.

State	# Units	# SCC	# SIC
AZ	3855	3855	3058
CA	68640	68640	68640
CO	16264	16264	16260
ID	80	80	80
MT	2051	2051	2051
NV	256	256	256
NM	2001	2001	765
ND	220	220	220
OR	1548	1548	1548
SD	45	45	45
UT	4480	4480	4378
WA	1806	1806	1806
WY	1991	1991	0

Records missing an SIC code and not captured as a result of their SCC were examined more closely. A summary of the findings and database changes are presented below:

- In AZ, several, mostly minor-sized (non-boiler) units at power plants were not captured. An SIC code of 4911 was added to these records to ensure complete data capture after re-executing query. Most of the emissions from the remaining uncaptured units with no SIC code are from internal combustion engines and mining operations, which are largely not BART-eligible. However, none of the 82 units at the Chemical Lime Company's Nelson Plant were captured because they all had an SCC representing diesel electric generators. Thus, an SIC code of 3274 was added to all 82 records to ensure complete data capture. In total, SIC codes were added to 118 records without SIC codes in AZ.
- In CO, all 4 records missing and SIC code were for the Holnam portland cement plant (state=08, county=043, plant=0001), to which an SIC code of 3241 was added.
- In NM, over half of the units have an SIC code of zero. The vast majority of emissions from these units are from oil and gas operations (e.g., compressors and flares), which are largely not BART-eligible, exceptions being sulfur recovery plants and large petroleum storage facilities, which tend to be captured due to the SCCs.

However, 13 units among three refineries (Artesia, Bloomfield, and Lea) were found to be not captured, so an SIC code of 2911 was added to their records to ensure complete data capture. SIC codes were added to an additional 34 records at different plants in NM.

- In UT, all 102 records missing an SIC code were for mostly minor-sized (non-boiler) units at power plants. An SIC code of 4911 was added to these records to ensure complete data capture. It was also discovered that the Cricket Mountain Lime Plant (county=027, plant=0005) had an SIC of 1422 instead of 3274. Hence, all 72 records at this plant were provided with an SIC of 3274 to ensure complete data capture.
- In WY, none of its 1,991 units have an SIC code. 563 of these records were captured as a result of their SCC. Most of the emissions from the remaining units are from internal combustion engines, oil and gas operations, and mining. However, a coke manufacturing unit (bee hive process, SCC=30300401, 400 tons of SO₂ and 200 tons of NO_x) was not captured, although “coke oven batteries” are listed in the CAA as a BART-eligible source. This was because the SCC identified by other RPOs as representing coke oven batteries was 303003xx (by-product coke manufacturing). Hence, the query in this step (3) was amended to capture records with an SCC of 303004xx. The Mountain Cement Company plant (county=001, plant=00002) was not captured because its primary emission unit had an SCC of 39000502 (Industrial Processes; In-process Fuel Use; Distillate Oil; Cement Kiln/Dryer). Hence, an SIC 3241 was added to all 20 records for the plant. The FMC Wyoming Corporation plant (county=037, plant=00049) has some units that get captured due to an SCC of 301xxxxx (chemical manufacturing), and over 100 tons (netted) are emitted from these units and they were captured. However, more is emitted (700 tons of PM₁₀ and 240 tons of NO_x) from units at the facility with an SCC of 30599999 (mineral products; other not defined). It was assumed that they should be included in the plant and therefore an SIC of 2899 was added to all records at the plant. Ditto on all accounts for the FMC Trona plant (count=037, plant=00004). Four units (932 tons of PM₁₀) from the Jim Bridger power plant (all cooling towers) were not captured because the SCCs are not 101xxxxx, so an SIC of 4911 was added to the units. Three units (590 tons of VOC) at the Frontier Refining plant (county=021, plant=00001) were not captured because the SCCs were not 306xxxxx, so an SIC of 2911 was added to the units. Fourteen units (157 tons of NO_x and 70 tons of PM₁₀) at the TG Soda Ash plant (county=037, plant=00010) were not captured. However, the other 9 units at the plant have SCCs of 102xxxxx or 301xxxxx, indicating a BART-eligible chemical process plant, so an SIC of 2899 was added to the 14 units. Eleven units (367 tons of NO_x) at the Sinclair refinery (county=007, plant=00001) were not captured, so an SIC of 2911 was added to these records. Smaller groups of units (in terms of emissions) not captured by the query described in this step were not inspected for being potentially uncaptured. Hence, any group of units mistakenly not captured at a given plant emitted less than 200 tons of any single pollutant. In total, SIC codes were added to 131 records representing the largest emitters not captured as a result of the SCCs, despite the apparent eligibility of the sources.

- As a result of the changes described above, 402 records had SIC codes added to them, and an additional 72 records (all UT’s Cricket Mountain Lime Plant) had their SIC codes changed. This resulted in the query capturing an additional 218 units and 3 plants. The vast majority of the BART category-eligible units and (to a greater extent) plants should be captured as a result. For any pollutant, the sum of emissions across any missed units at a plant are likely to be less than a couple hundred tons.
- 4. Identify Category-Eligible Plants – The table created in Step 3 was queried using the Microsoft Access totals function to “collapse” or sum unit-level emission to the plant level.
- 5. Identify Category-Eligible Plants >= 100 tpy – The table created in Step 4 was queried for all records (i.e., plants) emitting 100 tons or more of any visibility-impairing pollutant (i.e., SO₂, NO_x, PM₁₀, VOC, or NH₃). The result is a table containing all plants in the WRAP region containing at least one BART-eligible unit and whose emissions, when summed across all BART-eligible units at the plant, are 100 tpy or more for at least one visibility-impairing pollutant.
- 6. Identify Category-Eligible Units at Plants >= 100 tpy – The table created in Step 3 was queried for records (i.e., units) which were located at the plants identified in table created in Step 5. The result is a table containing all emission units in the WRAP region belonging to one or more the 26 BART categories and residing at a plant whose emissions summed across all category-eligible units at the plant are 100 tpy or more for at least one visibility-impairing pollutant.

Results

Table 1 (below) provides a summary of the emissions, by SCC, of the units identified in Step 6. The largest 12 of the 36 source categories accounts for approximately 99 percent of the emissions, with utility and industrial boilers accounting for about 75 percent of the emissions.

Table 2 shows all the plants identified in Step 5, in addition to the number of category-eligible units at each plant and their net emissions for each pollutant. The table shows 10,413 units located at 497 plants. Emissions from these units account for a large portion of the stationary source inventory. For SO₂, NO_x, PM₁₀, VOC, and NH₃, respectively, they account for 92, 76, 64, 33, and 87 percent of the stationary source inventory. These percentages are likely to decrease significantly as many sources are expected to be found not BART-eligible on the basis of their construction dates, PTE, and miscellaneous categorization issues.

Table 1. Emissions from BART Category-Eligible Units (tpy) at Plants Which Contain At Least One Category-Eligible Unit and Whose Sum of Actual 1996 Emissions Across all Category-Eligible Units Is at Least 100 tpy for at Least One Visibility-Impairing Pollutant, Grouped by the First Three Digits of the Units' Source Category Code (SCC). (Based on WRAP 1996 Stationary Source Inventory, Version 3)

SCC	SO2	NOx	PM10	VOC	NH3	Total	%
External Combustion Boilers; Electric Generation	747,087	610,194	42,068	5,059	551	1,404,958	67.1
External Combustion Boilers; Industrial	96,021	50,547	8,926	1,240	4,510	161,245	74.8
Industrial Processes; Petroleum Industry	59,328	34,883	6,366	26,258	9,246	136,081	81.3
Industrial Processes; Primary Metal Production	99,283	4,916	11,130	2,348	217	117,894	87.0
Industrial Processes; Mineral Products	21,652	53,706	29,345	1,634	6	106,343	92.0
Industrial Processes; Chemical Manufacturing	31,191	6,403	10,263	7,525	5,114	60,496	94.9
Industrial Processes; Pulp and Paper and Wood Products	6,223	10,842	6,207	7,925	12	31,210	96.4
Industrial Processes; In-process Fuel Use	2,594	11,629	406	364	0	14,994	97.1
Internal Combustion Engines; Electric Generation	183	10,535	1,281	746	0	12,744	97.8
Internal Combustion Engines; Industrial	250	8,228	559	640	187	9,863	98.2
Industrial Processes; Oil and Gas Production	7,329	89	1	66	0	7,484	98.6
External Combustion Boilers; Commercial/Institutional	1,883	4,085	992	450	4	7,413	98.9
Petroleum and Solvent Evaporation; Petroleum Product Storage at Refineries	0	1	0	6,020	0	6,021	99.2
Petroleum and Solvent Evaporation; Transportation and Marketing of Petroleum Products	0	4	0	4,584	0	4,588	99.4
Industrial Processes; Secondary Metal Production	205	903	1,130	600	1	2,840	99.6
Petroleum and Solvent Evaporation; Surface Coating Operations	240	22	2	1,710	0	1,974	99.7
Waste Disposal; Solid Waste Disposal - Government	12	282	782	652	0	1,729	99.8
Unidentified (almost entirely in CA)	779	149	265	26	0	1,220	99.8
Industrial Processes; Cooling Tower	0	0	1,188	0	0	1,188	99.9
Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery)	2	6	1	1,089	0	1,098	99.9
Internal Combustion Engines; Commercial/Institutional	18	340	16	24	0	398	99.9
Waste Disposal; Solid Waste Disposal - Industrial	12	136	27	199	0	375	100.0
Internal Combustion Engines; Fugitive Emissions	0	235	0	0	0	235	100.0
Petroleum and Solvent Evaporation; Organic Solvent Evaporation	7	2	1	225	0	235	100.0
External Combustion Boilers; Space Heaters	1	56	18	34	1	109	100.0
Industrial Processes; Miscellaneous Manufacturing Industries	2	30	50	2	0	84	100.0
Petroleum and Solvent Evaporation; Organic Chemical Storage	0	0	0	66	0	66	100.0
Petroleum and Solvent Evaporation; Printing/Publishing	0	2	0	59	0	61	100.0
Industrial Processes; Electrical Equipment	0	0	46	0	0	46	100.0
Internal Combustion Engines; Engine Testing	2	27	2	2	0	33	100.0
Waste Disposal; Solid Waste Disposal - Commercial/Institutional	1	1	4	1	0	7	100.0

SCC	SO2	NOx	PM10	VOC	NH3	Total	%
Industrial Processes; Rubber and Miscellaneous Plastics Products	0	0	0	7	0	7	100.0
Petroleum and Solvent Evaporation; Organic Chemical Transportation	0	0	0	3	0	3	100.0
Industrial Processes; Fabricated Metal Products	0	0	2	0	0	2	100.0
Waste Disposal; Site Remediation	0	0	0	2	0	2	100.0
Industrial Processes; Photographic Equipment/Health Care/Laboratories	0	0	0	0	0	0	100.0

Table 2. Number of BART Category-Eligible Units and Their Respective Emissions (1996 tons) Per Plant at Plants Which Contain At Least One Category-Eligible Unit and Whose Sum of Actual 1996 Emissions Across all Category-Eligible Units Is at Least 100 tons for at Least One Visibility-Impairing Pollutant. (Based on WRAP 1996 Stationary Source Inventory, Version 3)

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
AZ	001	0059	Salt River Project (SRP) Coronado Genera	8	14,263	10,305	205	61	0
AZ	001	0060	Tucson Electric Power Company Springervi	2	20,705	13,501	351	67	4
AZ	003	0037	Arizona Electric Power Cooperative, Inc.	6	8,635	12,250	696	78	0
AZ	003	0176	CHEMICAL LIME COMPANY DOUGLAS LIME PLANT	20	364	269	92	6	0
AZ	003	1143	Apache Nitrogen Products Inc. Apache	7	0	151	64	0	1
AZ	005	0004	NAVAJO	3	63,878	25,245	1,561	196	2
AZ	007	0898	Cyprus Copper Company Miami Smelter	5	5,737	305	252	203	0
AZ	013	1075	91ST AVE WASTEWATER TREATMENT PLANT	3	120	41	1	2	0
AZ	013	174	W R MEADOWS OF AZ INC	4	0	0	0	455	0
AZ	013	3313	APS WEST PHX POWER PLANT	26	2	943	1	23	0
AZ	013	3315	SANTAN GENERATING PLANT	18	8	401	1	7	0
AZ	013	3316	SRP AGUA FRIA	28	13	799	1	5	3
AZ	013	52382	OCOTILLO POWER PLANT	10	1	196	0	3	3
AZ	013	808	THE PRINCESS COGENERATION PARTNERSH	2	0	122	0	7	0
AZ	017	0397	Arizona Public Service Company (APS) Cho	9	12,159	10,133	632	13	0
AZ	017	0424	Abitibi Consolidated Snowflake Division	1	1,943	1,720	232	13	
AZ	019	0075	PIMA CO SEWAGE PLANT (INA)	1	0	258	0	0	0
AZ	019	0076	PIMA CO. WASTE WATER	1	0	228	0	8	0
AZ	019	0082	IRVINGTON	4	2,226	2,255	121	15	3
AZ	019	0310	ARIZONA PORTLAND CEMENT COMPANY (APC)	22	13	4,691	1,585	12	0
AZ	021	0012	ASARCO RAY MINE	3	0	13	1,576	1	0
AZ	021	0102	MAGMA COPPER CO.	7	16,678	968	381	25	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
AZ	021	118	SAGUARO	2	11	352	0	4	2
AZ	025	0421	Phoenix Cement Portland Cement Plant	22	196	2,628	179	0	0
AZ	025	0698	Chemical Lime Co. Nelson Lime Plant	14	122	719	356	17	0
AZ	027	0141	Yuma Cogeneration Associates	3	1	146	8	8	0
CA	001	0113031103	TEXACO ENVIRONMENTAL SERVICES	1	0	0	104	0	0
CA	001	0113031378	O L S ENERGY - BERKELEY	2	1	188	14	2	0
CA	001	0113032066	WASTE MANAGEMENT OF ALAMEDA CO	6	2	50	59	110	0
CA	001	0113032086	ANCHOR GLASS CONTAINER CORPORA	10	0	308	39	0	0
CA	001	01130330	OWENS-BROCKWAY GLASS CONTAINER	39	128	860	195	2	0
CA	001	01130383	UNITED STATES PIPE & FOUNDRY C	8	122	79	6	99	0
CA	005	0304013	JACKSON VALLEY ENERGY PARTNERS	13	0	0	89	146	0
CA	007	04160428	SANTA FE PACIFIC PIPELINES	31	0	0	0	140	0
CA	007	04160439	LOUISIANA PACIFIC CORPORATION	2	0	236	28	1	0
CA	007	04160440	LOUISIANA PACIFIC CORPORATION	11	0	4	114	24	0
CA	013	0010	CHEVRON USA, INC	382	0	0	0	0	541
CA	013	0011	SHELL OIL COMPANY	322	0	0	0	0	487
CA	013	0012	PITTSBURG	7	9	1,676	5	94	45
CA	013	0013	TOSCO CORP, AVON REFINERY	236	0	0	0	0	923
CA	013	0018	CONTRA COSTA	2	4	1,101	3	47	22
CA	013	07130310	CHEVRON PRODUCTS COMPANY	339	1,018	3,612	232	2,894	0
CA	013	07130311	SHELL MARTINEZ REFINING COMPAN	261	2,518	4,448	446	1,599	0
CA	013	07130313	TOSCO CORP, AVON REFINERY	252	4,460	2,570	125	2,311	0
CA	013	07130316	TOSCO RODEO REFINERY	144	728	1,663	53	593	0
CA	013	0713031851	ANCHOR GLASS CONTAINER CORPORA	19	0	509	38	1	0
CA	013	07130320	RHONE-POULENC INC	14	167	3	13	14	0
CA	013	0713032180	GAYLORD CONTAINER CORPORATION	4	1	143	20	5	0
CA	013	07130322	UNION CHEMICALS	11	1,535	565	50	0	0
CA	013	07130323	GENERAL CHEMICAL CORPORATION	12	201	1	3	1	0
CA	013	07130331	DOW CHEMICAL COMPANY	95	1	790	83	38	0
CA	013	07130332	PACIFIC REFINING COMPANY	78	290	386	12	352	0
CA	019	101430598	GUARDIAN INDUSTRIES CORP	3	433	1,051	12	1	0
CA	019	101430825	CHRYSLER CAPITOL FUNDING CORP.	1	7	176	23	0	0
CA	019	101430948	PPG INDUSTRIES	4	159	871	24	4	0
CA	021	1116101000	JOHNS-MANVILLE	44	4	123	199	143	0
CA	023	0059	HUMBOLDT BAY	2	193	234	1	7	4

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
CA	023	12062037	LOUISIANA-PACIFIC CORP, SAMOA	8	74	436	239	4	0
CA	025	0015	EL CENTRO	2	56	152	1	5	2
CA	025	13151110	HOLLY SUGAR CO 3	3	11	151	6	0	0
CA	025	13151121	U.S. GYPSUM	8	0	95	156	1	0
CA	027	1401097	UNITED STATES TUNGSTEN CORP.	3	123	43	8	2	0
CA	029	0028	U.S. BORAX & CHEMICAL	2	0	0	0	0	2,779
CA	029	0222	TEXACO PRODUCING INC	273	0	0	0	0	121
CA	029	15051220	CALAVERAS CEMENT CO	2	286	1,562	78	0	0
CA	029	15051221	NATIONAL CEMENT CO	27	6	1,524	234	3	0
CA	029	1505129	CAL PORTLAND CEMENT CO.	25	245	2,246	117	4	0
CA	029	1514302199	CHEVRON USA PRODUCTION INC	3	0	104	0	17	0
CA	029	15143033	TEXACO REFINING & MARKETING	115	190	603	56	343	0
CA	029	15143036	SAN JOAQUIN REFINING COMPANY	16	313	121	27	67	0
CA	029	15143037	KERN OIL & REFINING COMPANY	7	426	146	18	111	0
CA	029	15143073	OILDALE ENERGY LLC	2	1	150	28	2	0
CA	029	15143091	MT POSO COGENERATION COMPANY	1	41	178	2	0	0
CA	031	161430303	J.P. OIL COMPANY, INC.	1	0	0	0	120	0
CA	037	0006	CHAMPLIN PETR ;2402 E ANAHEIM;WILMINGTON	1	0	0	0	0	612
CA	037	0023	TEXACO	75	0	0	0	0	630
CA	037	1910261087 01	BALL FOSTER GLASS CONTAINER CO	1	0	177	0	0	0
CA	037	1910262237 3	JEFFERSON SMURFIT CORPORATION	15	0	107	2	3	0
CA	037	1910262408	TORRANCE HILTON AT SOUTH BAY	1	4	235	17	7	0
CA	037	1910264477	SO CAL EDISON CO	8	8	520	36	41	0
CA	037	1910264723 2	ARCO CQC KILN	13	343	346	68	1	0
CA	037	1910265162 0	WHEELABRATOR NORWALK ENERGY CO	7	1	110	12	27	0
CA	037	1910265571 1	SUNLAW COGENERATION PARTNERS I	3	0	138	13	46	0
CA	037	1910267427	OWENS-BROCKWAY GLASS CONTAINER	12	324	517	12	10	0
CA	037	1910267480	CENTURY MARBLE	9	0	0	0	117	0
CA	037	1910268000 12	ARCO PRODUCTS CO	173	2,333	2,132	482	1,024	0
CA	037	1910268000 26	ULTRAMAR INC (NSR USE ONLY)	142	959	314	191	290	0
CA	037	1910268000 30	CHEVRON U.S.A. INC	633	1,658	2,587	517	747	0
CA	037	1910268000 89	MOBIL OIL CORP (EIS USE)	226	807	2,057	152	341	0
CA	037	1910268001	SHELL OIL PRODUCTS CO	204	0	1	0	259	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
		15							
CA	037	191026800118	SHELL OIL CO (EIS USE)	19	0	0	0	133	0
CA	037	191026800131	RHONE- POULENC INC	11	443	22	10	2	0
CA	037	191026800144	UNION OIL CO OF CAL (NSR USE O)	81	1,006	1,697	183	373	0
CA	037	191026800183	PARAMOUNT PETR CORP (EIS USE)	55	64	158	24	189	0
CA	037	191026800204	SIMPSON PAPER CO	12	1	124	23	65	0
CA	037	191026800223	TEXACO REF & MARKETING INC	86	726	1,008	181	349	0
CA	037	191026800319	UNOCAL REFINERY & MARKETING CO	40	343	789	137	116	0
CA	037	19102682727	SMURFIT NEWSPRINT CORPORATION	6	1	361	14	44	0
CA	037	3094	EL SEGUNDO	4	9	189	2	41	19
CA	037	4207	ARCO UNIT NO. ;1801 E SEPULVE;CARSON	2	0	0	0	0	2,025
CA	037	4212	MOBIL OIL CORP.	56	0	0	0	0	486
CA	037	4214	SFE TECHNOLOGIES, SAN FERNANDO	3	0	0	0	0	327
CA	037	4215	CHEVRON USA	114	0	0	0	0	475
CA	037	4217	UNION OIL CO OF CAL (NSR USE O)	71	0	0	0	0	886
CA	037	5002	REDONDO BEACH	5	12	330	5	91	43
CA	037	5030	ALAMITOS	6	27	525	6	110	53
CA	037	5175	SCATTERGOOD	3	13	407	2	30	14
CA	037	5940	HAYNES	4	5	133	2	31	15
CA	039	201430261	CERTAINTEED CORPORATION	5	1	166	36	18	0
CA	039	201430801	MADERA GLASS	3	170	450	72	2	0
CA	053	0025	MOSS LANDING	2	956	2,491	16	139	68
CA	053	2707152	CHEMICAL LIME CO	7	69	228	52	2	0
CA	055	2813031129	HOMESTAKE MINING COMPANY	1	0	0	271	0	0
CA	059	0005	UNOCAL CHEMICIALS DIVISION	9	0	0	0	0	3,224
CA	059	0023	HUNTINGTON BEACH	2	2	203	1	22	10
CA	059	301026104017	AERA ENERGY LLC	3	0	4	0	582	0
CA	059	3010263361	BEHR PROCESS CORP	5	0	2	62	136	0
CA	061	31162344	RIO-BRAVO	1	21	107	28	4	0
CA	061	3116235	FORMICA CORPORATION	6	0	20	4	474	0
CA	065	33102612362	NUTRILITE DIVISION OF AMWAY CO	5	0	1	17	369	0
CA	065	33102623907	JOHNS MANVILLE CORP	22	0	24	73	133	0
CA	065	331026800182	RIVERSIDE CEMENT CO (EIS USE)	18	66	147	50	7	0
CA	067	34162427	PROCTER & GAMBLE	5	1	209	37	197	0
CA	071	0004	COOL WATER	2	2	274	1	17	8
CA	071	0028	ETIWANDA	4	2	216	1	25	12

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
CA	071	360518100005	SOUTHDOWN - VICTORVILLE PLANT	4	79	2,978	144	50	0
CA	071	36051811800001	MITSUBISHI CEMENT	78	574	1,427	239	11	0
CA	071	36051812000003	RIVERSIDE CEMENT COMPANY	52	526	3,706	186	121	0
CA	071	36051827000935	AFG INDUSTRIES INC	11	25	429	2	2	0
CA	071	36051869000004	COOLWATER GENERATING STATION	10	3	802	68	211	0
CA	071	3605188400589	US ARMY NATIONAL TRAINING CTR.	1	0	0	217	0	0
CA	071	3605189000002	IMC CHEMICALS, INC.	140	156	2,341	288	86	0
CA	071	36102646268	CALIFORNIA STEEL INDUSTRIES IN	57	2	317	33	51	0
CA	071	361026800181	CALIFORNIA PORTLAND CEMENT CO	13	53	2,289	133	1	0
CA	073	0072	SOUTH BAY	4	31	1,228	5	71	34
CA	073	0073	ENCINA	5	407	1,539	10	84	41
CA	073	371227118	NUTRASWEET KELCO CO	2	0	4	1	1,133	0
CA	073	3712277283	SD CITY/NORTH MIRAMAR LANDFILL	1	0	0	0	135	0
CA	073	3712277284	SD CITY/WEST MIRAMAR LANDFILL	3	0	5	763	309	0
CA	075	0024	HUNTERS POINT	5	4	661	2	38	18
CA	075	0026	POTRERO	1	3	696	2	31	15
CA	077	391430410	HOLLY SUGAR CORPORATION	8	0	270	3	0	0
CA	077	391430477	LIBBEY OWENS FORD (JON WEISS)	8	110	393	57	8	0
CA	077	391430593	OWENS-BROCKWAY GLASS CONTAINER	8	285	569	91	2	0
CA	077	391430692	RMC LONESTAR	5	0	0	108	0	0
CA	077	391430767	J R SIMPLOT COMPANY	18	102	14	85	0	0
CA	077	391430877	TRI/VALLEY GROWERS	6	0	101	1	0	0
CA	079	0008	MORRO BAY	4	4	415	3	47	23
CA	079	40113113	UNOCAL, SANTA MARIA REFINERY	19	225	96	11	138	0
CA	079	401131175	SANTA FE ENERGY RESOURCES	2	0	1	0	102	0
CA	079	4011314	UNOCAL CARBON PLANT	6	3,950	39	148	4	0
CA	079	40113158	CHEVRON USA	9	1	32	6	145	0
CA	083	42112512	CELITE CORPORATION	57	424	124	160	2	0
CA	083	4211251325	GAVIOTA O AND G - CHEVRON	13	1	6	4	125	0
CA	085	4313031136	LAIDLAW GAS RECOVERY SYSTEMS	7	1	126	5	3	0
CA	085	43130317	KAISER CEMENT CORPORATION	46	464	1,694	108	13	0
CA	085	43130341	OWENS CORNING	27	2	309	27	43	0
CA	085	431303732	JEFFERSON SMURFIT CORPORATION	5	1	396	13	2	0
CA	087	44071511	RMC LONESTAR INDUST CMNT PLANT	22	286	984	191	6	0
CA	089	4516282	CALAVERAS CEMENT	4	20	472	131	6	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
			COMPANY						
CA	089	45162823	SIMPSON PAPER CO.	6	315	158	72	12	0
CA	089	45162874	WHEELABRATOR LASSEN	2	2	228	13	1	0
CA	095	0015	EXXON CORPORATION	112	0	0	0	0	529
CA	095	48130315	EXXON CORPORATION	105	6,042	2,607	180	829	0
CA	095	4816355014	DIXON CANNING CORPORATION	3	0	143	2	1	0
CA	095	4816355139	PREMIER INDUSTRIES DBA INSULFO	3	0	2	1	266	0
CA	097	4906211000 6014	PG&E UNIT 17	1	0	0	24	102	0
CA	097	4906211000 6019	NCPA UNIT 3	1	0	0	1	110	0
CA	097	4913032254	SONOMA COUNTY DEPARTMENT OF PU	5	3	38	139	50	0
CA	099	5014301662	GALLO GLASS COMPANY	10	271	326	232	2	0
CA	099	5014301680	STANISLAUS FOOD PRODUCTS	3	0	127	2	0	0
CA	111	345	MANDALAY	2	4	157	2	40	19
CA	113	5716353	SPRECKELS SUGAR COMPANY	4	7	119	8	0	0
CA	115	58160815	ENERGY FACTORS EFR	3	34	108	34	4	0
CA	115	5816089999	BEALE AIR FORCE BASE	3	2	216	15	14	0
CO	001	0001	CHEROKEE	10	16,635	16,894	150	63	0
CO	001	0003	CONOCO INC DENVER REFINERY	59	2,617	998	206	610	165
CO	001	0004	COLORADO REFINING CO TOTAL PETROLEUM	61	664	251	365	2,926	65
CO	001	0014	CHASE TERM CO	12	0	0	0	102	0
CO	009	0001	COLORADO INTERSTATE GAS CO FLANK STA	5	0	4	1	177	0
CO	013	0001	PUBLIC SERVICE CO VALMONT	4	1,854	2,215	238	18	
CO	013	0003	SOUTHWESTERN PORTLAND CEMENT	28	160	1,708	552	130	0
CO	013	0025	SYNTEX CHEMICAL INC	5	0	11	1	180	0
CO	031	0008	ARAPAHOE	5	5,355	5,764	133	20	
CO	031	0012	GATES RUBBER CO	3	0	147	1	0	1
CO	031	0041	PUBLIC SERVICE CO DENVER STEAM PLANT	1	2	302	1	1	0
CO	031	1447	ROBINSON BRICK CO	1	55	65	131	41	0
CO	037	0029	EAGLE GYPSUM PRODUCTS WALLBOARD PLT	14	1	210	47	21	0
CO	041	0004	MARTIN DRAKE	7	5,391	7,223	305	23	0
CO	041	0006	US AIR FORCE ACAD DEPT OF AIR FORCE	6	0	116	1	1	0
CO	041	0030	RAY D NIXON	4	6,488	3,296	82	25	0
CO	043	0001	HOLNAM INC PORTLAND PLT	80	3,616	1,239	700	6	0
CO	043	0003	W N CLARK	7	1,354	917	20	5	
CO	045	0057	AMERICAN ATLAS NO 1/COLORADO GREENHOUSE	4	8	240	0	1	0
CO	049	0006	CLIMAX MOLYBDENUM AMAX HENDERSON MILL	16	0	6	114	3	0
CO	059	0008	ROCKY MOUNTAIN BOTTLE CO	7	221	251	66	42	1
CO	059	0820	TRIGEN - COLORADO ENERGY	5	4,574	2,441	25	17	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
			CORPORATION						
CO	067	0019	OAKRIDGE ENERGY INC	2	0	0	128	0	0
CO	069	0002	HOLNAM INC	48	464	1,548	80	3	0
CO	069	0011	COLORADO STATE UNIV	5	2	127	2	2	0
CO	069	0053	RAWHIDE	26	844	3,413	170	37	0
CO	075	0010	EXCEL CORP	4	5	203	0	4	0
CO	077	0002	CAMEO	5	2,956	2,671	56	8	
CO	081	0005	TRAPPER MINING INC	2	0	0	582	0	0
CO	081	0007	COLOWYO COAL CO	7	0	0	912	0	0
CO	081	0018	CRAIG	43	9,069	13,837	354	16	1
CO	085	0001	NUCLA	7	1,399	1,093	110	1	0
CO	087	0001	WESTERN SUGAR CO	2	19	340	21	2	0
CO	087	0011	PAWNEE	6	11,633	3,526	119	56	1
CO	099	0006	LAMAR	2	0	321	2	1	2
CO	101	0003	COMANCHE	6	14,463	7,046	389	66	1
CO	101	0048	CF & I STEEL L P	29	317	800	181	297	0
CO	107	0001	PUBLIC SERVICE CO HAYDEN	4	14,854	13,424	636	49	0
CO	107	0007	SENECA COAL CO	1	0	0	119	0	0
CO	107	0018	SENECA COAL CO SENECA II W	1	0	0	130	0	0
CO	107	0069	SENECA COAL CO	1	0	0	545	0	0
CO	123	0002	WESTERN SUGAR_COMPANY	2	63	276	20	1	0
CO	123	0003	EASTMAN KODAK CO	4	0	137	3	1	2
CO	123	0079	LIDLAW DENVER REGIONAL LDFL SOUTH	1	0	0	114	35	0
CO	123	0126	THERMO POWER & ELEC INC	5	2	386	37	11	0
CO	123	0250	THERMO COGEN PARTNERSHIP FT LUPTON	9	5	601	94	50	0
ID	005	0004	ASH GROVE CEMENT INKOM IDAHO 83245	2	200	123	285	0	0
ID	011	0013	IDAHO SUPREME POTATO BX246 FIRTH 83236	1	65	62	235	0	0
ID	023	0001	DOE - INEL IDAHO FALLS IDAHO 83407	12	1,847	561	6	0	1
ID	027	0010	AMALGAMATED SUGAR BX250 NAMPA ID. 83651	3	1,446	1,208	3,810	3	0
ID	029	0001	MONSANTO BOX816 SODASPRINGS IDAHO 82376	5	7,543	579	0	0	0
ID	029	0002	KERR MCGEE CHEM BX478 SODA SPRINGS 82376	2	0	104	3	2	0
ID	029	0003	BEKER INDUSTRIES BX37 CONDA ID. 83230	2	1,338	1	382	0	0
ID	029	0020	JR SIMPLOT CONDA IDAHO	1	4	117	184	2	0
ID	039	0001	MOUNTAIN HOME AFB MOUNTAIN HOME ID 83648	4	6	107	22	0	0
ID	065	0011	Ricks College	4	193				
ID	067	0001	AMALGAMATEDSUGARCOBOX3 000PAULIDAHO83347	1	180	371	232	1	0
ID	069	0001	POTLATCH CORP BX1010 LEWISTON ID 83501	11	659	597	2,967	0	0
ID	077	0005	FMC CORP BX411 POCATELLO IDAHO 83201	7	4,994	9	1,680	0	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
ID	077	0006	JRSIMPLOT BOX912 POCA TELLO IDAHO 83201	7	2,636	895	309	0	0
ID	083	0001	AMALGAMATED SUGAR BX127 TW.FALLS 83301	2	1,279	274	473	1	0
MT	003	0002	WESTMORELAND RESOURCES	16	4	31	272	0	0
MT	003	0003	SPRING CREEK COAL	16	3	24	283	0	0
MT	003	0004	DECKER COAL COMPANY	32	5	44	667	0	0
MT	007	0002	CONTINENTAL LIME	21	5	305	158	5	0
MT	013	0004	MONTANA REFINING	25	1,223	130	15	364	34
MT	013	0022	CONOCO INC.	7	0	0	0	174	0
MT	029	0012	COLUMBIA FALLS ALUMINUM	30	1,427	11	583	438	0
MT	031	0005	HOLNAM, INC.	50	2,427	1,678	187	2	0
MT	043	0001	ASH GROVE CEMENT	22	103	603	145	1	0
MT	049	0001	ASARCO INCORPORATED	35	10,182	26	103	1	0
MT	049	0011	CONOCO INC.	10	0	2	0	116	0
MT	057	0001	LUZENAC AMERICA - YELLOWSTONE MINE	11	6	52	171	4	0
MT	063	0006	STONE CONTAINER	40	152	1,893	436	819	0
MT	083	0003	LEWIS & CLARK	1	550	774	37	7	0
MT	087	0004	WESTERN ENERGY	36	32	68	694	0	0
MT	087	0008	COLSTRIP	4	12,194	22,068	3,990	211	2
MT	087	0009	BIG SKY COAL COMPANY	16	3	29	389	0	0
MT	093	0009	MONTANA RESOURCES	2	5	0	179	0	0
MT	111	0007	WESTERN SUGAR	7	125	272	22	2	0
MT	111	0011	CONOCO	29	829	809	133	894	146
MT	111	0012	CENEX	40	3,103	1,092	257	1,296	85
MT	111	0013	EXXON CO USA	17	5,118	670	147	742	135
MT	111	0014	MONTANA SULFUR & CHEMICAL	3	3,459	15	1	0	0
MT	111	0015	J E CORETTE	1	4,401	2,629	83	21	0
ND	007	0002	W.H. HUNT TRUST ESTATE	1	787	0	0	0	0
ND	017	0005	NORTH DAKOTA STATE UNIVERSITY	2	1	119	1	0	0
ND	035	0003	UNIV. OF NORTH DAKOTA HEATING PLANT	5	637	356	88	1	0
ND	055	0017	COAL CREEK	2	51,869	29,555	1,847	251	2
ND	057	0001	LELAND OLDS	2	37,135	15,814	363	112	1
ND	057	0004	STANTON	2	7,815	5,269	114	34	0
ND	057	0011	ANTELOPE VALLEY	2	14,890	11,446	306	181	2
ND	057	0012	COYOTE	1	17,914	13,476	63	80	1
ND	057	0013	DAKOTA GASIFICATION COMPANY	14	46,369	52	137	273	0
ND	059	0001	R M HESKETT	2	2,492	963	386	9	0
ND	059	0003	AMOCO OIL CO: MANDAN REFINERY	11	6,402	1,986	604	121	8
ND	065	0001	MILTON R YOUNG	2	45,502	30,056	512	155	3
ND	067	0003	AMERICAN CRYSTAL SUGAR: DRAYTON PLANT	1	820	884	166	0	0
ND	097	0019	AMERICAN CRYSTAL SUGAR: HILLSBORO PLANT	2	384	315	3	3	2

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
NM	001	0001	Rio Grande Portland Cement	1	1,109	1,000	176	0	0
NM	001	0011	REEVES	3	0	107	0	3	1
NM	007	0001	Raton Power Plant_gf	2	170	94	0	0	0
NM	013	0002	Rio Grande Gen.sta_gf	3	7	935	6	9	0
NM	015	0002	Empire Abo Gas Plnt_126m3	6	565	48	0	0	0
NM	015	0008	Indian Bsn Gas Plt_psd295m2	2	817	28	1	0	0
NM	015	0010	Artesia Refinery_195m5r	36	2,253	554	342	1,825	0
NM	015	0011	Artesia Gas Plant_434m5	1	1,459	4	0	4	0
NM	015	0021	East (nm Potash)_755	5	0	112	0	3	0
NM	015	0285	Dagger Draw Gas Plt_psd753m2	1	218	2	0	2	0
NM	017	0001	Chino Mines_376m1/298m1	9	14,784	475	814	2	0
NM	023	0003	Hidalgo Smelter_59m1	23	32,141	177	559	2	0
NM	025	0034	Maddox Sta_747	1	2	467	0	3	0
NM	025	0044	Eunice Gas Plant_44m6	3	1,469	30	0	2	0
NM	025	0052	Eunice North Gas Plant_57m3	3	275	4	0	0	0
NM	025	0054	Cunningham_psdgf	2	4	1,292	17	9	0
NM	025	0060	Eunice Gas Plant_67m3	2	1	180	18	7	0
NM	025	0061	Monument Plant_110m2	2	1,709	16	0	1	0
NM	025	0073	Lea Refinery_0273m1	11	27	278	0	382	0
NM	025	0190	Hobbs City Storage Yard_1486m1	1	0	0	0	178	0
NM	031	0004	Wingate Fraction Plant_1313	5	0	258	0	4	0
NM	031	0008	Ciniza Refinery_633m3	20	1,115	438	31	567	0
NM	031	0032	Escalante_psd285m3	2	754	2,578	0	31	0
NM	045	0002	FOUR CORNERS	5	36,838	44,127	4,581	231	3
NM	045	0009	Chaco Gas Plant_1555	2	0	206	0	2	0
NM	045	0023	Bloomfield Ref_402m6	18	772	268	24	1,205	0
NM	045	0247	San Juan Rvr_gf	3	817	62	0	2	0
NM	045	0902	San Juan Gen_63m1	4	34,971	23,532	2,704	203	0
NM	047	0002	Las Vegas_psd526m2	1	8	360	0	100	0
NV	003	0003	CHEMICAL LIME COMPANY - APEX	1	830	327	45	22	0
NV	003	0011	PABCO GYPSUM_WALLBOARD PLANT	4	0	82	307	0	0
NV	003	0019	TIMET (TITANIUM METALS)	3	0	136	2	0	0
NV	003	P001	MOHAVE	2	40,524	22,041	4,530	141	3
NV	003	P002	REID GARDNER	4	3,547	14,288	874	50	1
NV	003	P004	SUNRISE	1	5	196	1	0	1
NV	013	5001	NORTH VALMY	2	5,664	2,719	218	35	0
NV	019	0001	FORT CHURCHILL	2	143	2,386	800	42	20
NV	019	0387	NEVADA CEMENT CO	17	340	3,796	270	128	5
NV	029	0002	TRACY	3	262	2,383	860	48	22
NV	031	5000	US GYPSUM	9	208	103	33	1	0
NV	031	5201	SB GEO/STEAMBOAT/FARWEST	2	0	0	0	137	0
OR	001	0029	ASH GROVE CEMENT COMPANY	10	3	687	37	102	0
OR	005	1850	SMURFIT NEWSPRINT CORPORATION	7	16	452	57	5	0
OR	007	0004	JAMES RIVER II, INC.	18	572	921	362	267	2
OR	009	1849	BOISE CASCADE CORPORATION	23	685	1,730	195	247	8
OR	009	2085	ARMSTRONG WORLD	6	1	32	49	108	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
			INDUSTRIES INC.						
OR	009	2520	PORTLAND GENERAL ELECTRIC	4	0	5,378	88	0	0
OR	011	0015	WEYERHAEUSER COMPANY	6	126	188	301	0	0
OR	029	0041	DYNO POLYMERS INCORPORATED	6	0	2	0	222	0
OR	029	0159	BIOMASS ONE, L.P.	2	20	497	19	2	0
OR	041	0005	GEORGIA-PACIFIC WEST, INC.	24	71	2,535	16	3,459	0
OR	043	0328	OREGON METALLURGICAL CORPORATION	31	0	53	156	3	0
OR	043	0471	WILLAMETTE INDUSTRIES, INC.	21	13	706	174	109	1
OR	043	1024	GEORGIA-PACIFIC RESINS, INC.	2	0	0	0	2,699	0
OR	043	3501	POPE & TALBOT PULP, INC	19	133	6	68	0	0
OR	045	0002	AMALGAMATED SUGAR COMPANY, THE	8	497	179	25	0	0
OR	049	0016	BOARDMAN	1	5,507	4,196	108	31	0
OR	051	1851	REYNOLDS METALS COMPANY	4	89	42	554	2	0
OR	051	1865	OREGON STEEL MILLS, INC.	29	1	627	315	23	0
OR	051	2027	CHEVRON U.S.A. INC.	7	0	0	0	207	0
OR	061	0028	BORDEN INC	5	0	2	4	286	0
OR	065	0001	NORTHWEST ALUMINUM CO.	4	448	54	283	47	0
OR	071	5034	CASCADE STEEL ROLLING MILLS, INC.	18	29	108	51	109	0
OR	071	6142	SMURFIT NEWSPRINT CORPORATION	7	368	810	139	119	0
SD	011	0086	SOUTH DAKOTA STATE UNIVERSITY	2	341	196	236	0	0
SD	019	0004	WILLISTON BASIN INTERSTATE PIPELINE CO.	3	0	116	0	0	0
SD	051	1001	BIG STONE	1	14,034	16,297	37	74	0
SD	099	0088	JOHN MORRELL & COMPANY	2	280	236	1	0	0
SD	103	0001	BEN FRENCH	2	767	908	16	4	0
SD	103	0011	SOUTH DAKOTA CEMENT	6	654	2,877	163	0	0
SD	103	0014	PETE LIEN AND SONS, INC.	1	0	418	0	0	0
UT	003	0002	Nucor Steel	40	57	319	108	52	0
UT	003	0037	Utah Test and Training Range	4	0	3	543	0	0
UT	005	0013	Heating Plant - Primary Source	5	134	122	90	2	0
UT	007	0002	Carbon	16	4,918	3,345	116	20	1
UT	007	0030	Sunnyside Cogeneration Facility	26	1,006	273	65	15	0
UT	007	0042	East Carbon Landfill	13	14	120	11	222	0
UT	011	0003	Salt Lake Refinery	100	1,116	621	38	393	716
UT	011	0008	Flying J Refinery (Big West Oil Co.)	72	574	283	41	355	0
UT	011	0013	Phillips Refinery	75	864	520	63	426	16
UT	011	0019	Petroleum Products Refining	61	37	35	3	154	0
UT	011	0033	Energy Recovery Facility (DCERF)	7	75	342	5	1	0
UT	011	0072	Fiberglass Manufacturing	19	0	0	0	110	0
UT	015	0101	Hunter	29	6,279	19,242	1,438	125	1
UT	015	1001	Huntington Power Plant	21	12,631	15,207	857	88	1
UT	019	0006	Salt & Potash Production Facility	88	0	27	156	4	0
UT	023	0015	Leamington Cement Plant	51	3	1,198	146	63	0
UT	027	0005	Cricket Mountain Plant	72	297	797	489	21	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
UT	027	0010	Intermountain Generation Station	36	3,759	19,688	100	0	0
UT	029	0001	Devil's Slide Plant	63	3	584	601	2	0
UT	035	0004	Salt Lake City Refinery	81	983	514	44	876	0
UT	035	0030	Smelter, Refinery	50	1,555	170	404	7	30
UT	035	0063	University of Utah facilities	5	6	190	5	1	0
UT	035	0118	Point of the Mountain Facility	19	31	136	69	21	0
UT	035	0200	Brick Manufacturing Plant	14	113	36	171	4	0
UT	035	0289	Barney's Canyon Mine	4	0	0	149	0	0
UT	035	0346	N Concentrator,Power Plt, Lab, Tailings	16	4,283	2,156	97	10	0
UT	035	0347	Mine & Copperton Concentrator	5	0	0	1,908	15	0
UT	037	0032	Lisbon Plant-Crude Storage/Blending	7	1,391	51	0	5	0
UT	041	0002	Sigurd Plant	30	32	85	148	2	0
UT	043	0001	Shale Processing	23	63	146	29	2	0
UT	045	0003	U.S. Army-Dugway Proving Ground	7	29	8	287	0	0
UT	045	0030	Rowley Plant	71	41	781	1,313	251	0
UT	045	0060	Clive Hazardous Waste Incinerator	63	12	126	27	8	0
UT	047	7790	BONANZA	1	995	7,002	167	40	0
UT	049	0017	Pipe Casting Plant	39	3	33	12	249	0
UT	049	0027	Steel Manufacturing Facility	92	2,020	1,941	1,128	422	288
UT	057	0032	West Desert Operation - Salt & Potash Pl	28	8	116	174	10	0
WA	005	0002	UNOCAL AGRICULTURAL PRODUCTS GROUP	21	0	2,246	6	61	954
WA	005	0009	US ENERGY DEPT	3	457	249	12	1	3
WA	007	0001	ALCOA WENATCHEE WORKS	4	3,233	20	140	5	0
WA	009	0007	DAISHOWA AMERICA PORT ANGELES	6	762	278	108	19	1
WA	011	0005	JAMES RIVER II	22	200	1,660	312	443	7
WA	011	0011	VANALCO	16	2,172	78	655	80	0
WA	011	0013	BOISE CASCADE VANCOUVER	4	0	112	0	4	2
WA	015	0002	LONGVIEW FIBRE	37	1,272	2,170	398	660	10
WA	015	0003	WEYERHAEUSER CO LONGVIEW	18	994	2,956	417	633	5
WA	015	0009	BF GOODRICH KALAMA INC	23	20	103	25	158	0
WA	015	0015	REYNOLDS METALS LONGVIEW	6	56	54	514	436	0
WA	015	0044	WEYERHAEUSER CO	17	0	6	2	632	0
WA	027	0001	WEYERHAEUSER PAPER CO COSMOPOLIS	6	603	602	427	164	1
WA	027	0002	GRAYS HARBOR PAPER LP	3	19	272	105	8	1
WA	031	0001	PORT TOWNSEND PAPER	7	400	522	222	48	0
WA	033	0004	BALL-FOSTER GLASS CONTAINER CORP	8	238	814	126	0	0
WA	033	0006	BIRMINGHAM STEEL CORP (WEST SEATTLE)	5	108	566	238	75	0
WA	033	0015	BOEING COMMERCIAL AIRPLANE (AUBURN)	3	1	388	46	1	5
WA	033	0017	LAFARGE CORP.	3	302	1,776	125	0	0
WA	033	0017	Lafarge Corporation	3	302	1,776	125	0	0
WA	033	0023	WA, UNIV OF, POWER PLANT &	3	0	660	0	0	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
			HOSPITAL						
WA	033	0048	SEATTLE STEAM CO (WESTERN AVE)	8	49	430	7	2	0
WA	033	0052	BOEING COMMERCIAL AIRPLANE (RENTON)	2	24	324	4	1	0
WA	033	0061	BOEING SPACE CENTER (BSC)	4	0	59	1	0	952
WA	033	0099	ASH GROVE CEMENT COMPANY (E MARG.)	10	342	1,917	106	0	0
WA	035	0003	NAVSHIPYD PUGET SOUND	2	74	240	130	16	1
WA	035	0003	U S NAVSHIPYD Puget Sound	2	54	109	5	0	1
WA	039	0001	GOLDENDALE ALUMINUM CO	5	566	67	424	44	0
WA	041	0010	PACIFIC POWER	7	78,274	18,565	3,080	165	0
WA	053	0002	OCCIDENTAL CHEMICAL CORP	1	1	138	1	1	0
WA	053	0002	Pioneer Chlor Alkali Co Inc	3	0	138	0	1	0
WA	053	0008	SIMPSON TACOMA KRAFT CO	10	628	832	168	113	4
WA	053	0012	Abitibi Consolidated Sales Corp	6	8	211	80	65	1
WA	053	0012	STONE-CONSOLIDATED CORPORATION	10	8	211	81	65	1
WA	053	0019	KAISER ALUMINUM TACOMA WORKS	3	1,721	7	151	75	0
WA	053	0020	U S ARMY FORT LEWIS	2	171	134	18	9	0
WA	053	0020	U S Army Fort Lewis Da, Public Works	3	171	134	18	5	0
WA	053	0022	U S OIL & REFINING CO	9	94	312	44	560	2
WA	053	0820	CONTINENTAL LIME INC	13	152	139	125	3	0
WA	053	3920	STEAM PLANT 2	2	113	212	11	1	0
WA	057	0002	GENERAL CHEMICAL CORP	2	165	10	0	0	0
WA	057	0003	TEXACO REFINING & MARKETING	22	6,293	1,038	137	751	610
WA	057	0005	TESORO NORTHWEST CO	34	3,138	1,479	299	2,010	11
WA	061	0002	KIMBERLY CLARK TISSUE CO EVERETT	5	502	1,478	56	108	0
WA	063	0016	KAISER ALUMINUM MEAD WORKS	7	6,374	183	255	82	0
WA	063	0023	KAISER TRENTWOOD	15	23	179	82	391	0
WA	063	0025	USAF FAIRCHILD AFB	3	0	163	0	0	0
WA	063	0097	WASTE TO ENERGY	2	4	236	2	2	0
WA	065	0025	NORTHWEST ALLOYS INC	8	0	723	21	0	0
WA	071	0003	BOISE CASCADE WALLULA	12	2,008	1,080	348	913	2
WA	073	0001	INTALCO ALUMINUM	5	4,631	61	442	106	0
WA	073	0004	GEORGIA PACIFIC	8	58	205	85	85	3
WA	073	0005	TOSCO CORP	24	1,607	551	87	663	2
WA	073	0007	ARCO PETROLEUM CHERRY POINT	38	1,408	3,135	146	799	9
WA	073	0028	PUGET POWER WHITEHORN	3	2	213	7	6	0
WY	001	00002	MOUNTAIN CEMENT CO	20	111	1,444	148	20	0
WY	001	00005	UW CENTRL HEAT PLANT	4	172	71	4	1	0
WY	005	00002	BLACK HILLS POWER & LGHT SIMPSON 1	3	696	532	455	4	0
WY	005	00004	THUNDER BASIN COAL-BLACK THUNDER	16	29	27	836	4	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
WY	005	00008	CORDERO MINE	11	0	0	304	0	0
WY	005	00010	POWDER RIVER COAL-CABELLO MINE	9	0	0	781	0	0
WY	005	00015	POWDER RIVER COAL-NORTH ANTELOPE MINE	4	0	0	424	0	0
WY	005	00016	KERR-MCGEE COAL CORP - JACOBS RANCH MINE	6	0	0	600	0	0
WY	005	00017	POWDER RIVER COAL-RAWHIDE	12	0	0	177	0	0
WY	005	00019	POWDER RIVER COAL-ROCHELLE COAL MINE	6	0	0	556	0	0
WY	005	00041	CABALLO ROJO, INC-CABALLO ROJO MINE	5	0	0	275	0	0
WY	005	00043	TRITON COAL COMPANY-BUCKSKIN MINE	16	0	0	196	0	0
WY	005	00044	AMAX COAL WEST-EAGLE BUTTE MINE	9	0	0	306	0	0
WY	005	00045	AMAX COAL WEST-BELLE AYR MINE	9	0	0	540	0	0
WY	005	00046	PACIFICORP-WYODAK	9	8,144	5,259	1,744	64	0
WY	005	00063	BLACK HILLS POWER & LGT-SIMPSON 2	7	710	575	79	2	0
WY	007	00001	SINCLAIR OIL CORP	50	3,976	1,130	212	2,766	0
WY	007	00020	ARCH OF WY-MEDICINE BOW MINE	1	0	0	295	0	0
WY	009	00001	PACIFICORP-DAVE JOHNSTON	6	23,531	15,744	1,399	126	0
WY	009	00008	GLENROCK COAL CO-DAVE JOHNSON MINE	1	0	0	430	0	0
WY	009	00010	ANTELOPE COAL_CO, ANTELOPE MINE	8	0	0	373	0	0
WY	011	00002	AMERICAN COLLD-EAST COLONY	11	0	6	131	0	0
WY	013	00005	KOCH SULFUR PRODUCTS COMPANY	3	1,121	7	0	0	0
WY	013	00028	LOUISIANA LAND & EXPLOR-LOST CABIN	2	161	8	0	0	0
WY	015	00001	HOLLY SUGAR-TORRINGTON PLANT	6	137	57	7	1	35
WY	021	00001	FRONTIER REFINING, INC.	40	1,649	360	262	1,235	0
WY	021	00002	COASTAL CHEMICAL	26	4	206	698	43	600
WY	023	00001	FMC COKING PLANT	9	407	206	118	4	14
WY	023	00004	PACIFICORP-NAUGHTON POWER PLANT	14	20,653	14,911	2,105	97	0
WY	023	00005	NORTHWEST PIPELINE-KEMMERER COMPR STN	5	0	441	0	16	0
WY	023	00006	PITTSBURG & MIDWAY	9	0	1,079	362	1	0
WY	023	00008	PITTSBURG & MIDWAY-SKULL POINT MINE	2	0	0	159	0	0
WY	025	00005	LITTLE AMERICA REFINERY	26	1,470	334	56	1,083	0
WY	029	00003	CELOTEX CORP.	13	299	15	21	0	0
WY	029	00007	OREGON BASIN GAS PLANT OP-184	1	265	1	0	0	0

State	County	Plant ID	Plant Name	Units	SO2	NOx	PM10	VOC	NH3
WY	029	00012	AMOCO PROD CO.-ELK BASIN GAS PLANT	5	2,573	54	0	0	0
WY	029	00014	WYOMING LIME PRODUCERS-FRANNIE	6	4	142	53	1	0
WY	031	00001	BASIN ELECTRIC-LARAMIE RIVER STATION	5	10,382	22,246	1,518	209	0
WY	033	00007	BIG HORN COAL CO, BIG HORN MINE	8	0	1	239	1	0
WY	035	00004	WILLIAMS FLD SVCS-BIG PINEY COMP STN	5	0	357	0	9	0
WY	037	00001	OCI (RHONE-POULENC) WYOMING	4	1	405	30	6	0
WY	037	00002	GENERAL CHEMICAL	50	4,120	3,837	557	378	0
WY	037	00003	P4 PRODUCTION-ROCK SPRINGS FACILITY	4	727	312	262	2	0
WY	037	00004	FMC TRONA	45	4	286	846	191	0
WY	037	00005	SOLVAY MINERALS, INC.	15	101	1,464	85	7	0
WY	037	00007	CHURCH & DWIGHT	19	0	37	133	0	0
WY	037	00010	TG SODA ASH, INC.	23	226	2,278	200	1,530	0
WY	037	00012	PACIFICORP-BRIDGER COAL COMPANY	4	32	399	593	0	0
WY	037	00015	BLACK BUTTE LEUCITE_HILLS MINE	1	0	0	734	0	0
WY	037	00017	BLACK BUTTE COAL CO- BLACK BUTTE MINE	1	0	0	2,627	0	0
WY	037	00022	SF PHOSPHATES, INC	10	1,225	84	90	2	296
WY	037	00036	UNION PAC-PATRICK DR	16	0	431	2	24	0
WY	037	00048	FMC CORP-GREEN RIVER PLANT-SODIUM PROD	9	5,196	2,686	254	2	0
WY	037	00049	FMC WYOMING CORPORATION	34	0	322	998	194	0
WY	037	01002	PACIFICORP-JIM BRIDGER	8	19,332	26,198	4,341	235	0
WY	041	00009	CHEVRON CARTER CREEK	1	187	5	0	4	0
WY	043	00008	CROWN CORK AND SEAL CO-WORLAND PLANT #2	9	0	2	0	105	0
WY	045	00001	WYOMING REFINING CO-NEWCASTLE REFINERY	16	905	185	379	11	4
WY	045	00003	WYOMING PIPELINE CO-MUSH CREEK STATION	4	0	0	0	287	0
WY	045	00005	BLACK HILLS OSAGE	6	2,682	761	886	7	0

ATTACHMENT 3

A “Control Analysis Approach” as an Alternative to Explicit Identification of BART-Eligible Sources in the State of California

A “control analysis approach” is one possible alternative to identifying BART-eligible sources in the state of California. The approach would examine the stringency of current pollution control limits on all BART categories. Since the primary purpose of identifying BART-eligible sources is to provide a basis for determining which of these should be subject to BART, a determination that all BART categories are already controlled at levels equivalent to or better than BART would make irrelevant any explicit identification of BART-eligible sources.

Under the “control analysis approach,” the California Air Resources Board (ARB), using its state-wide emissions inventory, would identify (by air district) all stationary sources that fall into one of the 26 BART categories and emit 100 tons per year or more of any visibility impairing pollutant. The resulting list of sources would most likely include all BART-eligible sources, in addition to others. Then, on a district-by-district basis, the types of BART categories identified as being present in the district would be compared to pollution control limits currently in place for such categories. An assessment of the control limits – e.g., comparison of emission rates or control efficiencies to New Source Performance Standards, Best Available Control Technologies, modern facility performance, or information from air pollution control vendors – would be used to verify that BART-eligible sources are already controlled at levels equivalent to or better than BART.

Since pollutants will be best controlled in areas where such pollutant cause violation of state and federal standards, the “control analysis approach” could be optimized by focusing extra attention on particular pollutants in air districts that have not violated one or more of the ozone, particulate matter, sulfur dioxide, and nitrogen dioxide standards. For example, extra attention could be paid to any VOC sources identified above by the ARB in the Modoc County Air Pollution Control District, which is not in violation (and may never have been in violation) of the state and federal ozone standards, but which is in violation of state particulate matter standards.

Although requiring a significant level of effort, a “control analysis approach” for California sources may be less intensive than a “bottom-up” approach explicitly examining and identifying each BART-eligible source. The efficiency of these alternative approaches will depend much on the type of information available from each district, its accessibility, and the availability of district staff.

Finally, it is worth noting that California has already identified BART-eligible sources for sulfur dioxide (see background documentation for the GCVTC SO₂ Annex).