

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

In the Matter of:)
Basin Electric Power Cooperative) Docket No. 10-2802
Air Quality Permit No. MD-6047)
BART Permit: Laramie River Station)

RESPONSE TO BASIN ELECTRIC'S MOTION FOR SUMMARY JUDGMENT

EPA's initial comments, dated 5/23/08

EXHIBIT 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8P-AR

MAY 21 2008

David Finley, Administrator
Air Quality Division
Dept. of Environmental Quality
122 W. 25th St.
Cheyenne, WY 82002

RE: EPA Region 8 comments on BART analyses prepared by Pacificorp, FMC, General Chemical, and Basin Electric Power

Dear Dave:

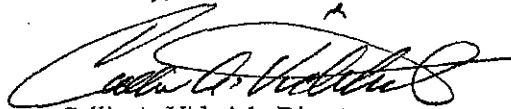
EPA Region 8 has completed a preliminary review of the proposed Best Available Retrofit Technology (BART) analyses prepared by Pacificorp for their BART units at Jim Bridger, Dave Johnston, Naughton and Wyodak plants, by FMC for their BART units at Granger and Green River Westvaco plants, by General Chemical for their BART units at Green River Works plant, and by Basin Electric Power for their BART units at Laramie River Station. Our comments are detailed in the enclosure to this letter. We note that we may also have additional comments during the public comment period for each BART permit.

Once you draft and finalize BART permits for the above sources, we understand that you plan to incorporate the BART requirements from the BART permits into a draft Regional Haze (RH) State Implementation Plan (SIP). Please note that all necessary BART permit requirements (e.g., emission limits, compliance schedules, monitoring, recordkeeping, and compliance determining methods) must be included in your RH SIP. We note that we do not view the BART permit process as a substitute for the RH SIP adoption and review process, and that we may have additional comments at that stage. As we have discussed, a 60-day consultation period on the RH SIP revision must be provided to the Federal Land Managers prior to a public hearing, and we request the same opportunity. Also, we emphasize that we will only come to a final conclusion regarding the adequacy of Wyoming's BART determinations when we act on Wyoming's RH SIP revision, through public notice and comment rulemaking.

We want to acknowledge your efforts soliciting and reviewing the BART analyses for these sources. As you know, BART controls are an important part of the RH program. With good BART controls on BART eligible sources, it will be easier for Wyoming to assure reasonable progress toward the national visibility goal.

We have appreciated working with your staff during this stage of your BART process. We look forward to continued communications during the rest of your BART process and your development of the RH SIP revision. If you have any questions on EPA's comments, please contact me at 303-312-6434, or have your staff contact Brenda South at 303-312-6446.

Sincerely,



Callie A. Videtich, Director
Air and Radiation Program

Enclosure

cc: Chris Shaver, NPS
Sandra Silva, USFWS
Bud Rolofson, USFS

ENCLOSURE

EPA Region 8 Comments on BART Analyses prepared by Pacificorp (Jim Bridger, Dave Johnson, Naughton, Wyodak), FMC (Granger, Green River Westvaco), General Chemical (Green River Works), and Basin Electric Power (Laramie River Station)

1. Emission averaging periods

None of the proposed BART limits have the 30 day averaging period required by the BART guidelines. See 70 FR 39172, col. 3, July 6, 2005. We view a 30 day or shorter averaging period as being necessary to protect visibility in the nearby Class I areas, since visibility is sensitive to short term spikes in pollutants which contribute to visibility impairment. We must see 30 day or shorter averaging periods in Wyoming's BART permits and RH SIP.

2. Pacificorp Naughton Unit 3

We disagree with Pacificorp's recommended NO_x control option, tuning the existing low NO_x burners (LNB) with overfire air (OFA) which leaves them above the presumptive limit of 0.28 lbs/mmBtu at 0.35 lbs/mmBtu. Another option, LNB/OFA/selective catalytic reduction (SCR), identified in Pacificorp's BART analysis as feasible, is cost effective at \$2049/ton and would meet a 0.07 lbs/mmBtu limit, which is lower than the BART presumptive limit. From Pacificorp's Naughton Unit 3 BART analysis, it appears that SCR would provide a significant visibility benefit of approximately 1.61 deciview at Bridger. We calculated this approximate visibility benefit by comparing Pacificorp's visibility modeling analyses with and without SCR. We believe SCR is viable and would like Wyoming to consider this option.

3. Visibility Threshold

The Pacificorp BART analyses reference a paper by Dr. Ronald Henry¹ that asserts that deciview changes of less than 1.5 cannot be distinguished by the human eye. Based on this document, Pacificorp asserts that while the company will be spending many millions of dollars on BART controls, they expect to see minimal visibility improvements.

The threshold of perceptible change in visibility has been long debated in the scientific community and a number of investigators have found thresholds ranging from between 0.5 deciview and 2 deciview. In the promulgation of the regional haze rule EPA settled this issue for the purposes of regional haze planning and a value of 0.5 deciview was set as a presumptive upper bound in determining which sources are subject to BART. The regional haze rule states that "... for the purposes of determining which sources are

¹ Henry, R. C.; Just Noticeable Differences in Atmospheric Haze, Journal of the Air & Waste Management Association, 52:1238-1243, October 2002.

subject to BART, States should consider a 1.0 deciview change or more from an individual source to "cause" visibility impairment, and a change of 0.5 deciviews to "contribute" to impairment." See 70 FR 39120, column 3. It is important to note that regional haze is a cumulative regional issue with numerous sources contributing to the overall level of haze and therefore controls on a single source would not be effective in resolving the haze issue.

In Pacificorp's CALPUFF modeling, the analysis looked at the incremental visibility benefit of applying controls on each unit. To more precisely determine the overall benefit of applying BART, we recommend that Pacificorp also consider modeling the combined visibility effect of applying BART at all the eligible units at each plant. We believe that such an analysis would likely show more visibility improvements.

4. SCR

We encourage Wyoming to make BART determinations and to do a Reasonable Progress analysis requiring LNB/OFA/SCR and 0.07 lbs/mmBtu or lower NO_x limits at as many sources as is cost effective. Based on information provided by the sources, it appears that for many units, SCR could be considered. With the visibility benefits from SCR, Wyoming's RH SIP would be much stronger and Wyoming would be closer to achieving the Uniform Rate of Progress (URP).