

## Response to EPA's Comments of May 29, 2008

1. Comment: WRAP needs to justify using 0.5 deciviews as a threshold for determining whether sources are subject to BART.

Response: EPA's BART guidelines state that "As a general matter, any threshold that you use for determining whether a source 'contributes' to visibility impairment should not be higher than 0.5 deciviews." The guidelines give states the discretion to establish a lower threshold "if they conclude that the location of a large number of BART-eligible sources within the State and in proximity to a Class I area justify this approach. When developing the modeling protocols for the visibility analysis, the four participating states established the threshold at 0.5 deciviews because it is consistent with EPA guidelines, and is consistent with long-standing visibility modeling practices. Significant BART-eligible sources that are in proximity to Class I areas in the west have been addressed through the reasonably attributable visibility impairment process, and there is not a large concentration of BART-eligible sources that are in proximity to a Class I area. In addition, the backstop trading program will include all sources with emissions over 100 tons/year and will therefore still include sources that may not be subject to BART. The guidelines do not require states to establish a lower threshold, and the four participating states do not believe that a lower threshold is needed or justified.

Language has been added to the Better Than BART demonstration to explain that the 0.5 deciview threshold is consistent with EPA's BART guidelines.

2. Comment: When estimating BART emission reductions WRAP excluded some non-utility sources that it characterizes as potentially subject to BART and this not consistent with regulatory requirements.

Response: The analysis excluded a small number of non-utility sources that in aggregate represent 1% of the regional milestone. EPA has not established a presumptive control level for these sources and there is little benefit to doing a case-by-case analysis because the results would have a negligible impact on the regional milestone. These sources will still be included in the backstop trading program.

3. Comment: When establishing milestones, WRAP used presumptive levels in some cases and source specific information in others. A consistent approach is needed.

Response: The WRAP addressed this issue in the Better Than BART demonstration in response to earlier comments from EPA (see the end of Section D, page 7). An alternate analysis was conducted that assumed that all EGUs that were subject to BART (including units that are smaller than 750 MWs or are already operating at greater than 50% control) would be operating at the presumptive SO<sub>2</sub> emission rate of 0.15 lb/MMBtu. The estimated SO<sub>2</sub> emission reductions using this simpler approach were 91,872 tons. This is comparable to the estimated reduction of 91,760 that was calculated using the more detailed method. The participating states chose to use the more detailed method because it was based on the best information that was available rather than relying on the

presumptive level for all sources. However, the alternate analysis is useful to show that a simpler consistent approach achieves the same result.

4. Comment: The alternative program must include all BART-eligible sources not just sources that are subject to BART.

Response: As recognized in EPA's comments, the alternative program applies to all sources with actual emissions greater than 100 tons/year SO<sub>2</sub> and is likely to include all BART-eligible sources. However, to address the possibility that there may be an unusual source that would not be included based on actual emissions, each of the participating states will either include language in their backstop trading rule to ensure that all BART-eligible sources that are BART-eligible due to SO<sub>2</sub> emissions are subject to the backstop trading program, or will include an analysis in their SIP that demonstrates that all BART-eligible sources meet the 100-ton SO<sub>2</sub> threshold.

5. Comment: The alternative program does not directly address the distribution of emissions. At a minimum the SIP should include a determination, supported by a clear weight of evidence that Section 309 achieves greater reasonable progress than would be achieved through the installation and operation of BART.

Response: The WRAP conducted modeling that compared command and control BART to a trading program during the development of the Annex. A new Section H has been added to the end of the Better Than BART demonstration to reference the results of that analysis that was submitted to EPA in 2000.