



**Clean Air Task Force
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REGIONAL HAZE BEST AVAILABLE RETROFIT TECHNOLOGY (BART) FACT SHEET

August 1, 2001

BACKGROUND

The scenic vistas in America's national parks and wilderness areas are suffering from air pollution. Pollution from power plants and other stationary sources, has, over the past half century, obscured the magnificent vistas replacing them a colorless and unhealthy haze. In some parks, visibility is about one quarter or less of what it could be under near natural conditions. Disturbingly, in a number of important parks throughout the U.S. (e.g. Big Bend, TX, Badlands, SD, Great Smoky Mountains TN & NC, Rocky Mountain CO, Bryce Canyon UT and other national parks) visibility is actually deteriorating. Moreover, in the class I areas of the southern Appalachians, sulfate particulate matter—predominantly from old power plants-- is responsible for 85 percent of the haze on the worst days.

Congress established a national goal in the 1977 amendments to the Clean Air Act: “the prevention of any future and the remedying of any existing impairment of visibility” in mandatory class I federal areas. The 156 class I areas include national parks (48), wilderness areas and national wildlife refuges (108) exceeding approximately 5000 acres, in existence at the time of the 1977 amendments.

The 1977 amendments to the Clean Air Act also required that EPA promulgate guidelines to states to review and clean up stationary sources (power plants and 25 other source categories) that cause visibility impairment in a class I area. This guidance was established in 1980 and is referred to as *attributable BART*. The 1980 *attributable BART* guidelines apply only to a single source or a small group of sources that are reasonably anticipated to cause or contribute to visibility impairment in a Class I area. Because of the relatively high burden of proof to identify culpable sources applied by EPA, attributable BART has rarely been applied and has had limited benefit in meeting the national visibility goal. For this reason, EPA is proposing a second BART program, “regional

The EPA included in its 1999 final Regional Haze Rule requirements for establishing *Regional Haze BART*. Regional haze is the result of the collective contribution of many sources over a broad region rather than the result of a single or small group of sources near a park or wilderness area. *Regional haze BART* is very important because it applies to larger groups of sources that “may reasonably be anticipated to cause or contribute to any impairment of visibility in any class I area” The Regional Haze BART proposed rule published in the Federal Register July 20, 2001, p 38108. The federal register can be accessed at: http://www.access.gpo.gov/su_docs/aces/aces140.html

The BART rule could mean major SO₂ reductions—CATF / MSB Energy Associates have estimated a potential maximum reductions of 3.8 million tons SO₂ beyond Phase II and 1.6 million tons NO_x post-Clean Air Act if the tons are permanently retired and allowances /credits are not issued for the reductions for use in other Clean Air Act programs.

Curbing SO₂ means cutting sulfate and the particulate matter it forms. Sulfate particulate matter not only causes haze but acid rain and health impacts. Sulfate has been associated with respiratory and cardiac disease such as asthma and heart attacks, as well as premature death in many major studies. *If you can see it you are breathing it.*

BART SOURCE ELIGIBILITY

- BART targets “grandfathered” utility and industrial boilers, pulp mills, refineries, smelters, cement plants, and other stationary sources.
- Requires states to adopt visibility SIPs to reduce haze in any class I airshed in any state.

Comment: The proposal that all states are “in” should be strongly supported.

- BART applies to about 583 power plant units of Aug 7, 1962-Aug 7 1977 vintage with *potential to emit* 250 tons per year of visibility-impairing pollution (e.g. SO₂, NO_x, PM, VOCs).

Comment: Total haze-causing pollutants from all units of a power plant should be summed to meet 250-ton criteria rather than on a pollutant-by-pollutant basis. Also any power plant that has at least one unit “in” should be “in” or subject to BART for ALL its units.

- The BART analysis also applies specifically to all electric plants that are greater than 250 million BTU/hour.

Comment: This threshold should be in aggregate—in other words, all units at a source should be totaled to see if 250 million BTU/hr is exceeded, rather than the second proposed option that the threshold criteria would apply to individual units separately.

PROPOSED BART METHODOLOGY

- Sources must first identify all control options available. Two options are offered for comment in the proposal:

- A) A plant-by-plant determination of the “Best Available Retrofit Technology” using “top-down” (BACT) method of review. Top-down means reviewing available technology starting with the best.
- B) A weaker methodology beginning with minimum or mid-range technology and looking at feasibility of better technology from that point.

Comment: The environmental community should reject option B. Best available should be just that -the best. Option A needs strong vocal support.

- The proposal includes a presumption that SO₂ can be controlled at a 90-95% level.
Comment: This must be reinforced in all comments. A similar presumption should be stipulated in the rule for NO_x at 90%.

- The BART analysis required of the states must also take into account the cost of compliance and remaining useful life of the source.
Comment: If some power plants are determined to have little remaining useful life, then the environmental community should demand a binding and enforceable commitment to shut down.

- Cap and Trade program option: The rule provides for an alternative cap and trade mechanism with the stipulation that the results must be better.
Comment: The environmental community should demand that the visibility results be better. It is not enough to simply reduce tons of emissions nationwide, as the locations of emissions reductions are critical to improving visibility in specific parks and wilderness areas.

Will the reductions be permanent? From the proposed rule is unclear whether BART reductions must be permanent under the cap or would create allowances under other emissions reductions programs. If a cap and trade alternative is allowed, the caps set must be above and beyond the emissions caps established for the Title IV and NO_x SIP Call.