

Memorandum

From: Don Watzel
To: Dave Finley, Bernie Dailey, Chad Schlichtemeier, Ken Rairigh
Date: June 9, 2006
Re: BART Screening Analysis

The Division has completed the BART screening analysis for fourteen (14) facilities in Wyoming with BART eligible emission units to determine which facilities produced a significant impact on visibility on Class I areas in Wyoming, Colorado, and South Dakota. The list of BART-eligible sources and emissions inventory was compiled from the District Engineers. Altogether, there were fourteen (14) facilities identified.

The U.S. EPA regulations for best available retrofit technology (BART) are contained in 40 CFR Part 51, Appendix Y, published July 6, 2005 in the Federal Register, and provide the guidelines for BART determinations. Section II of Appendix Y discusses a three-step procedure for identifying BART eligible sources. A source is BART eligible if it 1.) belongs to one of the 26 listed categories, 2.) was “in existence” on August 7, 1977, but not “in operation” before August 7, 1962, and 3.) has the potential to emit greater than 250 tons per year of any single visibility impairing pollutant. If a facility meets all three criteria mentioned, then a screening analysis will determine if it will be “subject to BART”, per Section III of Appendix Y.

As specified in the Division’s BART modeling protocol dated April, 2006 (attached), a source will have been deemed to produce a significant impact to visibility on a Class I area if the source has a modeled impact to visibility value greater than 0.5 deciview (dv) to determine a daily maximum change in visibility (Δ dv) value for each Class I area and year of meteorological data. The visibility impact threshold to determine BART sources is a 98th percentile change in visibility (Δ dv) of 0.5 dv above background conditions. Therefore, if the 8th highest Δ dv value is equal to or greater than 0.5 dv, the source will be considered to cause or contribute to visibility impairment in the subject Class I area, and therefore is “subject to BART”. However, if the 8th highest value for all three years at each Class I area in a given domain is less than 0.5 dv, the source will not be subject to BART. Using these criteria, the fourteen (14) facilities were screened for BART subjectivity. Table 1 details the emission units at the BART eligible sources. The facilities subject to BART and not subject to BART are denoted below. Screening results, which provide the maximum change in visibility, number of days > 0.5 dv, and 8th high values, are summarized in the attached spreadsheet(s):

Subject to BART (src>0.5 dv)

Pacificorp – Bridger
Pacificorp – Naughton
FMC – Granger
FMC – Green River
Basin Electric – LRS

Not Subject to BART (src<0.5dv)

P4 Production
OCI Wyoming
Dyno Nobel
Sinclair – Casper Refinery
Black Hills – Neil Simpson 1

Pacificorp – Wyodak
Pacificorp – Dave Johnson
General Chemical

Sinclair – Sinclair Refinery