



MANE-VU Approach to BART

Wick Havens
PA DEP
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Mid-Atlantic/Northeast Visibility Union

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What are the BART requirements?

1. Identify all BART-eligible sources in each state
2. Determine if sources are “subject” to BART
3. Conduct BART determinations for each source “subject” to BART

Step 1. I.D. BART Eligible Sources

- The States have worked iteratively with NESCAUM to refine and revise a list of BART eligible sources in each state.
 - Applies to sources in 26 industrial categories installed between 1962 and 1977 with potential emissions greater than 250 tons of a visibility impairing pollutant.

Step 2. 'Subject to BART'

- States may:
 - Make BART determinations for all eligible sources.
 - Consider exempting some sources from BART requirements based on modeling.
(MANE_VU States decided against this option because of resource constraints and the five factor evaluation on modeled contribution)

Step 3. BART Determinations

- States must identify the best system of controls considering:
 - Degree of visibility improvement (note that states have flexibility in how they choose to consider this factor)
 - Availability & Cost
 - Energy and nonair quality environmental impacts
 - Controls in place
 - Remaining useful life

Theoretical 5-factor Analysis

Control Decision =

w_1 * Visibility +

w_2 * Cost +

w_3 * ENAQEI +

w_4 * Controls in place +

w_5 * Remaining useful life

In reality, these weighting factors are very subjective and a mathematical representation of this process is difficult....

Real-world

5-factor Analysis

- Need to balance degree of visibility improvement and environmental benefits against cost and environmental issues



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- The RPO has identified a set of sources whose potential “degree of visibility improvement” is so small, that no reasonable weighting could justify additional controls under BART

(Note that all of these sources combined would still meet the EPA criterion for exemption)

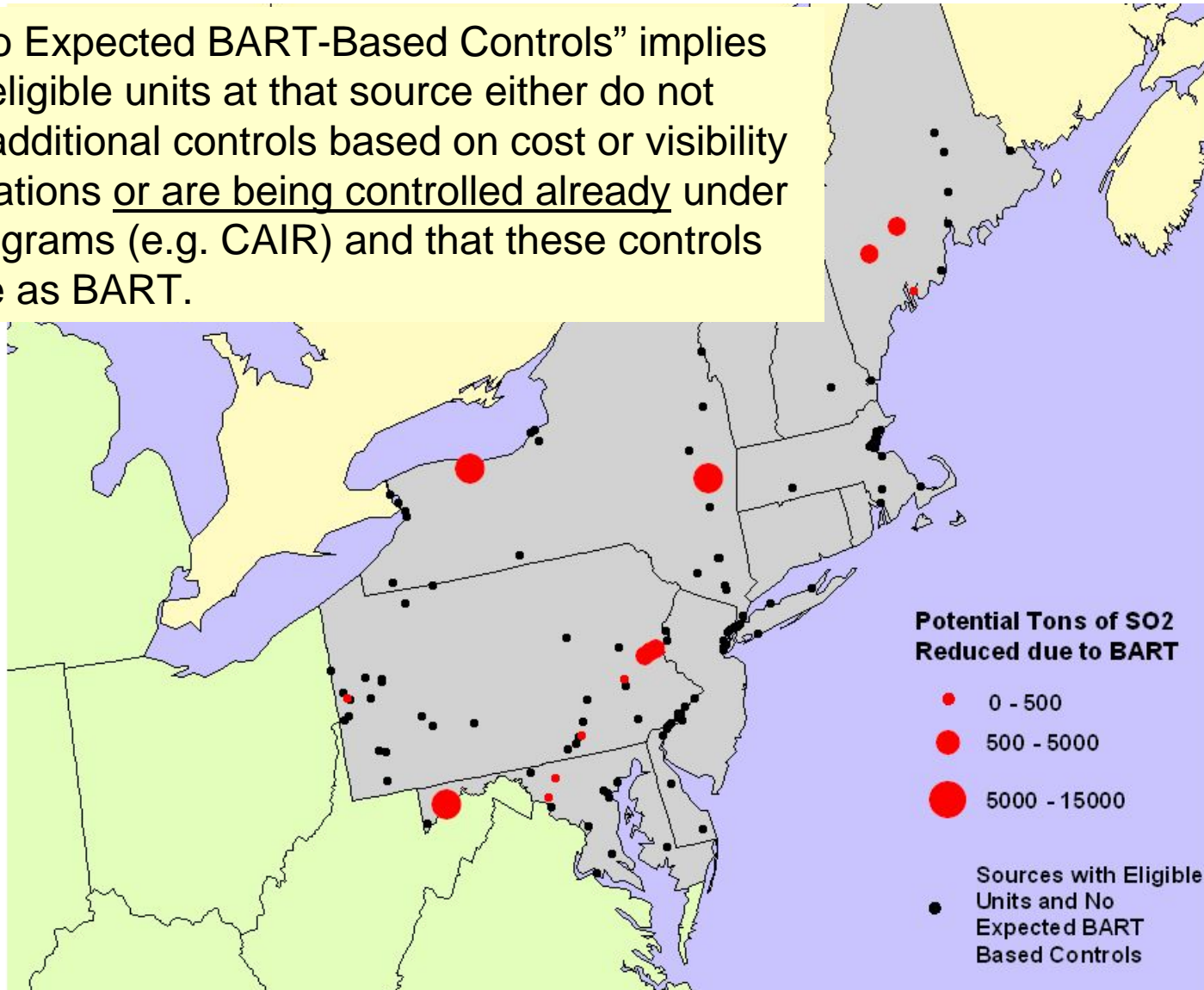
MANE-VU Approach (cont.)

- All sources are being reviewed at the state level:
 - Those with small potential “degree of visibility improvement” are likely to receive a more cursory review.
 - Those with a larger potential “degree of visibility improvement” will receive more detailed scrutiny

This approach comports with “state flexibility” provided by the Regional Haze Rule!

Potential BART SO₂ reductions?

Note: “No Expected BART-Based Controls” implies that the eligible units at that source either do not warrant additional controls based on cost or visibility considerations or are being controlled already under other programs (e.g. CAIR) and that these controls will serve as BART.



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