

Oral Statement of Bruce Polkowsky
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before
EPA Hearing Panel on Regional Haze Regulations and Guidelines for
Best Available Retrofit Technology (BART) Determinations
Denver, CO
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Chair and members of the hearing panel, I am Bruce Polkowsky of the National Park Service's Air Resources Division. I'm happy to respond to your request for comment concerning your proposed regulations establishing the guidance for States in determining best available retrofit technology (BART) on sources which contribute to visibility impairment in parks and wilderness areas. The National Park System includes parks and historic sites in every state, and in both urban and rural locations. (See attached map). We have the responsibility to protect and preserve the resources and values of all these sites, but especially in Class I areas, for future generations. Visibility impairment is the most ubiquitous air pollution-related problem in our national parks. This proposal is of interest because we provide comment to states on their plans to improve visibility conditions at our Class I areas, in keeping with the national visibility goal. These regulatory guidelines provide a

strong basis for our review. Even considering the national trend toward improving air quality, many of our areas still suffer visibility impairment from air pollution. Under the provisions of the Clean Air Act, many of our larger parks have been designated as Class I areas and will be the direct beneficiaries of this rulemaking. While the focus of EPA's proposed rule is to give guidance on how the BART requirement of the 1999 Regional Haze Rules is to be implemented for protection of these Class I areas, we feel that the application of BART on older sources, which emit large quantities of pollution, will have substantial visibility benefits in almost all of our units.

We are working with other bureaus in the Department of the Interior to provide detailed written comments on this rulemaking before the close of the comment period in July. For today I would like to focus my comments on three areas: visibility modeling to determine the sources that will be subject to a BART determination, the technology selection approach, and the default emissions limits for large fossil-fuel fired electrical generating plants.

The proposed rules now include source eligibility criteria for BART based on air quality modeling. We request that EPA clarify that the purpose of this modeling assessment is to evaluate a

source's anticipated impact on regional visibility in a uniform atmosphere over the Class I area. This would eliminate controversies regarding interpretation of model results for views solely within a Class I area. Clarifying the purpose of the assessment provides better support for using a 0.5 deciview threshold for sources to be subject to a full BART review. It also simplifies the reporting of a visibility change due to implementation of proposed BART controls.

A strong BART requirement provides certain, cost-effective reductions in emissions from existing sources allowing States more latitude in planning for future economic growth of cleaner new facilities. The National Park Service strongly supports the EPA draft rule for BART Guidance with EPA's preferred position of starting with the technology which achieves the most reduction of emissions when assessing the appropriate type of control technology to be applied as BART. This approach is consistent with other programs, such as the programs to review new large emissions sources in areas that meet health standards, by assessing the feasibility of applying the best of current technology and balancing that with costs and other environmental impacts. State and local air pollution agencies, as well as industries and their consultants, are familiar with this process and

have been applying it for over a decade. The BART provisions are the first key step in fulfilling the long-term goal of the visibility protection program.

We applaud EPA for determining the BART emissions levels for fossil fuel fired electrical generating units with a megawatt capacity of 250 MW or greater. The proposed emissions levels take into account the availability of cost-effective emissions technologies, the requirements for emissions reductions already required (such as the NO_x SIP call) and the characteristics of the type of coal burned (eastern v. western). We encourage EPA to continue to review advancements in cost-effective emissions technologies, especially in the area of combustion control technologies for reducing NO_x when setting the final BART emissions levels. Recent proposals for retrofits of NO_x controls indicate that combustion control systems can achieve emissions limits below EPA's proposed 0.2 lbs/MMBtu. In addition, we request that EPA specify an averaging time for the SO₂ and NO_x BART emission limits. Given that visibility impacts will be modeled and measured on a 24 hour basis, we suggest an averaging time of 24-hours.

In conclusion, the National Park Service thanks you for this opportunity to comment on your proposed rule and I would be happy to answer any clarifying questions you may have.