



IN REPLY REFER TO:

United States Department of the Interior
NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225



N3615 (2350)

September 29, 2011

Stuart Clark
Manager, Air Quality Program
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Clark:

On August 26, 2011, we received notice of availability for review of Washington Department of Ecology's Compliance Order and Technical Support Document for Best Available Retrofit Technology (BART) for TransAlta's Centralia Power Plant to comply with the law enacted by the Washington Legislature earlier this year. In compliance with that law, TransAlta will shut down Unit 1 by 2020 and Unit 2 by 2025 to reduce greenhouse gas emissions. To fulfill the BART requirements, TransAlta will operate selective non-catalytic reduction (SNCR) technology on both units beginning January 2013.

The Compliance Order specifically references the BART Determination Support Document and the BART Analyses for the Centralia Power Plant for further information. The BART analyses assumed that SNCR would achieve a 25% reduction in nitrogen oxide emissions (NO_x) and an emissions limit of 0.18 lb/mmBtu for a 30-day rolling average.

The revised Compliance Order now proposes a control efficiency of 10% reduction in NO_x emissions and an emissions limit of 0.216 lb/mmBtu for a 30-day rolling average. An optimization study is planned to determine what control efficiency is actually feasible for SNCR at Centralia.

Ecology has not provided a strong technical justification for changing the emissions limits that were the basis of the supporting analyses for the BART determination. The change appears to be based solely on a request by TransAlta in response to vendors who declined to guarantee emissions limits before testing. If Ecology grants TransAlta's proposal for a higher emissions limit, there is no incentive for TransAlta to improve that limit through the proposed optimization project. Instead we recommend that Ecology

retain the 0.18 lb/mmBtu emissions limit until TransAlta demonstrates through the optimization project that the limit is not practical.

Alternatively, Ecology could establish enforceable emissions reductions equivalent to the original expectation of a 25% NO_x reduction. One way to accomplish this is to set a NO_x budget for the remaining life of the facility. Based on data from the Clean Air Markets Division, Centralia's annual average heat input for 2008-2010 was 99 million mmBtu/yr. Assuming future utilization equivalent to 2008-2010, or 50 million mmBtu/yr for each unit, and 0.18 lb NO_x per mmBtu limit beginning in January 2013, NO_x emissions over the remaining life of the facility (eight years for one unit and 13 years for the other unit) would be 94,500 tons. A lifetime cap of 94,500 tons of NO_x could be achieved either by improving efficiency of the SNCR, reducing facility utilization compared to 2008-2010, or closing one or both units earlier than the mandated closure dates. This approach would provide greater operational flexibility for TransAlta while still accomplishing the expected NO_x reductions. An annual emissions budget would provide a similar alternative. To meet BART requirements, these emissions budgets would need to be enforceable.

We appreciate the opportunity to work with the State to improve visibility in our Class I national parks and wilderness areas. If you have questions, please contact Pat Brewer of my staff, at (303) 969-2153.

Sincerely,



Carol McCoy
Chief, Air Resources Division

cc:

Rick Albright
Director, Office of Air, Water, and Toxics
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