



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

SEP 18 2007

Robert Elliott, Director
Southwest Air Pollution Control Authority
1308 NE 134th Street
Vancouver, WA 98685

Phyllis Baas, Section Manager
Air Quality Program
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504

Re: Best Achievable Retrofit Technology Applicability for the TransAlta Centralia Power Plant

Dear Mr. Elliott and Ms Baas:

This letter is in response to questions from your staff regarding the Federal Register notice concerning EPA's approval of the 1999 Washington Visibility State Implementation Plan. Specifically, the questions relate to EPA Region 10's opinion regarding the Best Achievable Retrofit Technology requirement's applicability to the TransAlta Centralia Power Plant for purposes of developing the Regional Haze Implementation Plan for Washington.

The Federal Register notice approving Washington's Visibility State Implementation Plan states that:

"Both SWAPCA in their technical support document for the RACT Order and EPA region 10 have independently conducted an analysis of the emission limits in the RACT Order comparing them against what would have been required using the Clean Air Act definition of BART and EPA BART Guidelines. ... The conclusion of both analyses is that the RACT Order emission limits for SO₂ and PM-10 represent BART. EPA is approving these emission limitations as meeting the BART requirements of 40 CFR 51.308 (c)(4).¹ Additionally while the NO_x emission limitation may have represented BART when the emission limit in the

¹ The reference to 40 CFR 51.308(c)(4) in the federal register notice is obviously in error as there is no such provision. The correct reference is to 40 CFR 51.302(c)(4).

RACT Order were negotiated, recent technology advancements have been made. EPA cannot now say that the emission limitations in the RACT Order for NOx represent BART.”

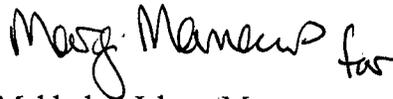
68 Fed. Reg. 34821, 34824 (June 11, 2003)

The Federal Register notice also states that “[i]n the future regional haze SIP, a BART analysis may be required for the [Centralia Power Plant] under 40 CFR 51.308(e). Thus, as reflected in that rulemaking action, in EPA Region 10’s view, the SO2 and PM-10 emission limits, established in the SWAPCA RACT Order No. 97-2057R1, satisfy the 40 CFR 51.302(c)(4) BART requirements. However, the NOx emission limits in the Order do not.

The Federal Register notice, along with EPA’s technical analysis of the RACT order’s emission limits, is enclosed for your convenience.

If you have additional questions concerning this matter please call me at (206) 553-6985, or your staff may call Keith Rose at (206) 553-1949.

Sincerely,

A handwritten signature in black ink that reads "Mahbubul Islam" with a stylized flourish at the end.

Mahbubul Islam, Manager
State and Tribal Air Programs Unit

Enclosures

cc: Paul Mairose, SWAPCA
Al Newman, Ecology
Doug Schneider, Ecology