

EPA DECISION ON UTAH'S REGIONAL HAZE SIP

- On July 5, 2016, EPA published its final rule partially approving and partially disapproving Utah's Regional Haze State Implementation Plan (SIP). This is the SIP that the Air Quality Board approved in June last year. The PM10 portion of the SIP was approved. The alternative to BART for NOx was disapproved.
- As part of the disapproval, the EPA imposed a Federal Implementation Plan (FIP). The FIP requires Selective Catalytic Reduction (SCR) technology to be installed on units one and two of the Hunter and Huntington power plants by 2021.

Reasons for Disapproval

- Utah used nine weighted factors to determine whether BART or an alternative would be more effective at improving visibility in the region's Class I areas. Based on our analysis, the BART alternative provided a greater visibility benefit.
- The nine factors used to evaluate the BART alternative were:
 1. Implementation cost
 2. Energy and non-air quality benefits
 3. 98th percentile modeling impact (deciview [dv]) results derived from CALPUFF modeling
 4. Timing of emissions reductions
 5. Annual emissions of visibility-impairing pollutants
 6. Improvement in the number of days with significant visibility impairment derived from CALPUFF modeling results
 7. Annual average impact (dv) derived from CALPUFF modeling results
 8. 90th percentile impact (dv) results derived from CALPUFF modeling
 9. Results from IMPROVE monitoring data
- The EPA evaluated and weighted the nine factors differently than Utah. Cost and energy and non-air quality benefits were eliminated as factors because EPA said they were not relevant to visibility benefits. Our analysis showed that these two factors clearly favored the BART alternative.
- Of the remaining seven factors, the 98th percentile was the only one that clearly favored BART. The EPA chose to give the most weight to the 98th percentile modeling results.
- The timing of emissions reduction clearly supported the BART alternative. But the EPA chose to give this factor very little weight.
- The EPA found, as did Utah's analysis, that the remaining five factors marginally supported the BART alternative. The EPA chose to give these factors very little weight.

Potential Next Steps

- Utah does have the opportunity to revise the SIP and propose a BART alternative that is clearly better than BART.
- PacifiCorp is planning to file a lawsuit contesting the EPA's decision.
- Utah may also file a lawsuit.