

# CAA BACT Requirement

1. Power Generation Technology v. Emission Control Technology
  - Emission limitation achieved through “application” of control technologies to the proposed “installation”
  - “For the control of pollutants”
  
2. BACT is Not a Means to “Redefine” the Design of the Source
  - EPA Policy
  - Fundamental differences between IGCC & CFB
  - Policy is based on rational judgment
  - Board should give deference to DAQ’s judgment
  - 21 of 23 States
  
3. IGCC is Not an “Available” Technology
  - Hasn’t been “successfully demonstrated in practice on full scale operations”
  - Not commercially offered at the 270 MW size
  
4. General Rulemaking v. Case-Specific Adjudication



## 5 Step “top-down” analysis:

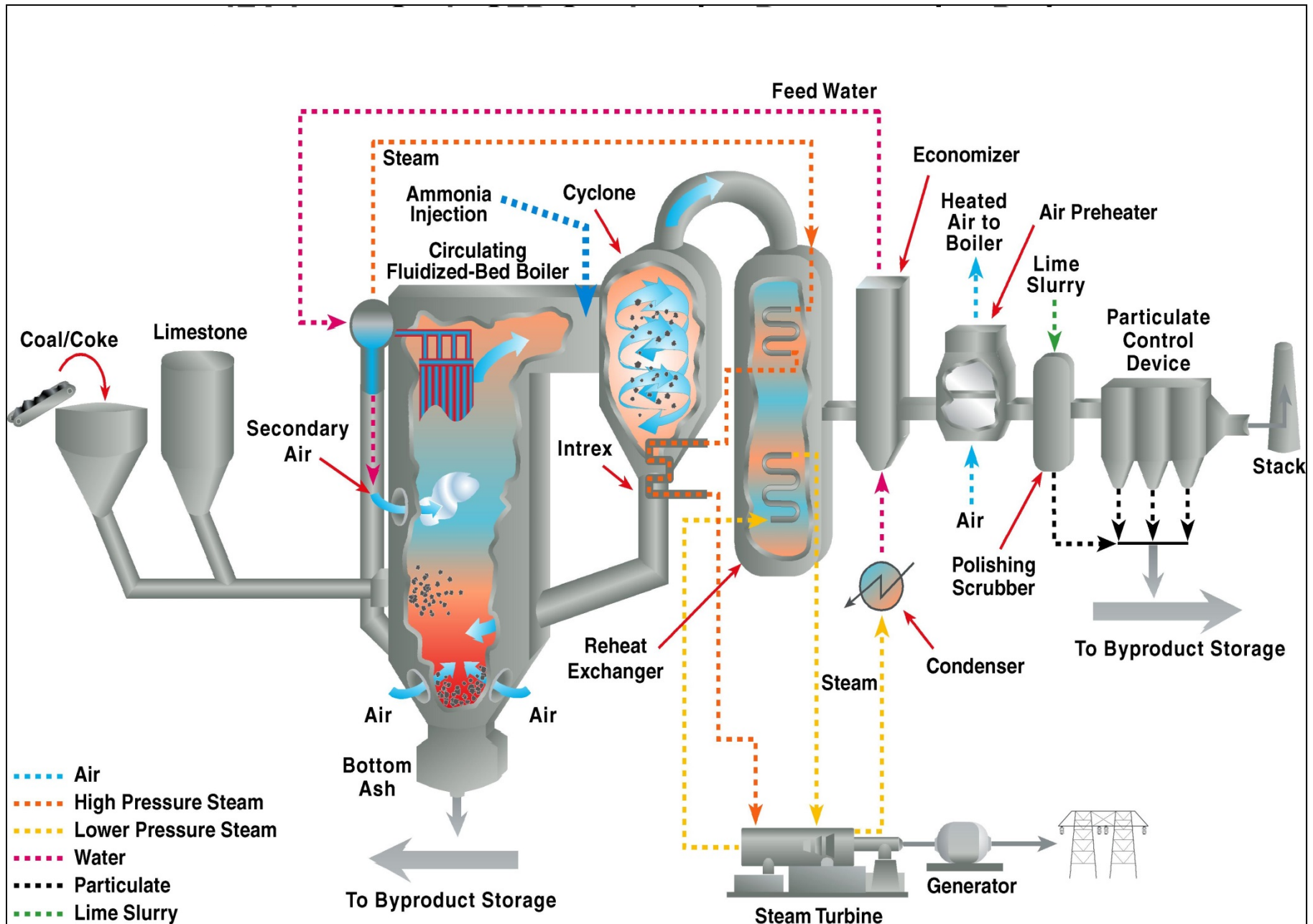
- STEP 1: Identify All Available *Control* Technologies
  - “which have “been **successfully** demonstrated in practice on **full scale** operations,” and
  - “with a practical potential for application **to the emission unit . . . under consideration**” (NSR Manual B11 & 5)
- STEP 2: Eliminate Technically Infeasible Options
- STEP 3: Rank Remaining Control Technologies by Control Effectiveness
- STEP 4: Evaluate Most Effective Controls
- STEP 5: Select BACT

# BACT Definition

- an emission limitation and/or other controls
- to include design, equipment, work practice, operation standard or combination thereof,
- based on the maximum degree or reduction of each pollutant subject to regulation under the Clean Air Act and/or the Utah Air Conservation Act
- emitted from or which results from any **emitting installation**,
- which the Air Quality Board, on a case-by-case basis taking into account energy, environmental and economic impacts and other costs,
- determines is **achievable for such installation**
- **through application of production processes** and available **methods, systems and techniques**, including fuel cleaning or treatment or innovative fuel combustion techniques **for control of each such pollutant.**



# CFB



# IGCC

