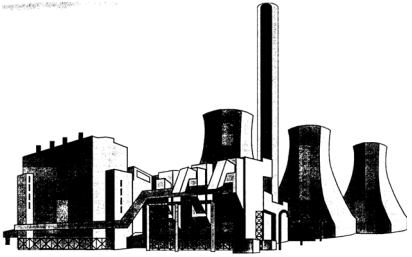


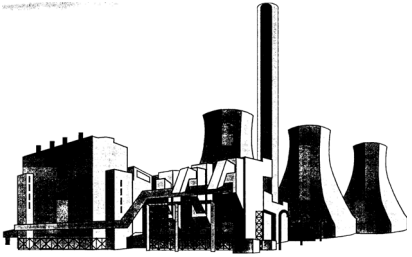
**Allegheny Energy Supply
Comments Presented to MANE-VU
by Jim Murphy
on
NESCAUM's Report
"A Basis for Control of BART-
Eligible Sources"**

September 19, 2001



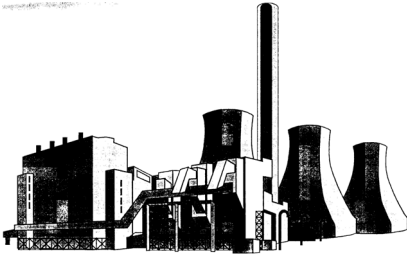
Summary of Comments

- **Concern with lack of stakeholder involvement in preparation of report**
- **Concern with focus solely on electric utility source category**
- **Concern with technical basis for identification of “region of influence”**
- **Concern with identification of BART-eligible sources**
- **Concern with adoption of presumptive NO_x and SO₂ BART controls**



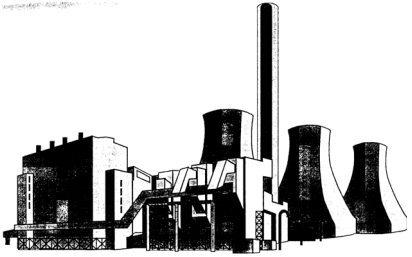
Why lack of stakeholder involvement?

- **OTC March 28, 2001 resolution for creation of MANE-VU contains three recommendations concerning public stakeholder participation:**
 - **Meetings “should be open to the public”**
 - **Committees “should provide a mechanism for outside parties to provide input”**
 - **Consideration for the “creation of an advisory panel of outside stakeholders”**
- **Allegheny is disappointed there was no opportunity for stakeholder input in the development of the NESCAUM BART report.**
- **Today’s opportunity to provide comment on a final report that was published on July 24, 2001 does not appear to be meaningful.**



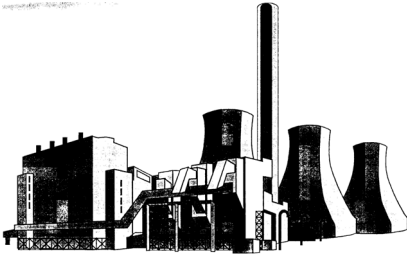
Why focus solely on electric utility source category?

- **Allegheny doesn't understand why the NESCAUM report focuses solely on the electric utility source category when the BART provision is meant to apply to a total of 26 specified major point source categories?**
- **At a minimum, the report should have included a review of the emissions inventory of the other 25 source categories within the MANE-VU region.**



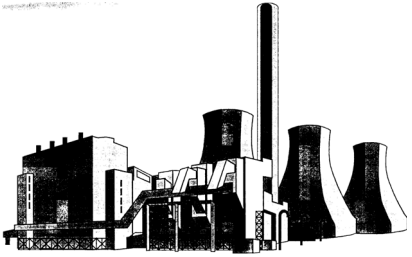
What is technical basis for “region of influence”?

- **Allegheny is concerned with the overly simplistic reliance on the back trajectory analysis of precursor emissions to conclude that “the greatest impact on visibility in Northeast and Mid-Atlantic Class I areas is due to coal combustion sources in the Ohio River and Tennessee Valley areas of the Midwest and Southeast U.S.”**
- **Did NESCAUM even consider the possible impact of emissions from the large urban areas within the Northeast that were along the same “flight path”?**



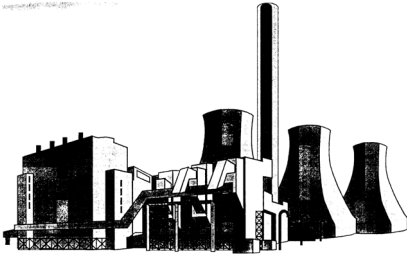
Identification of BART-eligible sources

- **Allegheny is concerned that NESCAUM may have incorrectly identified BART-eligible sources in their analysis.**
- **Allegheny's Mitchell Power Station is one example.**
 - **Mitchell includes three generating units identified as Units 1, 2, and 3.**
 - **Units 1 and 2 share three common boilers identified as Boilers 1,2,and 3 that went into operation in the late 1940's and therefore are not BART-eligible.**
 - **Unit 3 is provided steam from Boiler 33 which went into operation in 1963 and would be BART-eligible.**
 - **The NESCAUM report incorrectly lists both Units 3 and 33 as BART-eligible sources, obviously being confused with the unit/boiler identification system.**



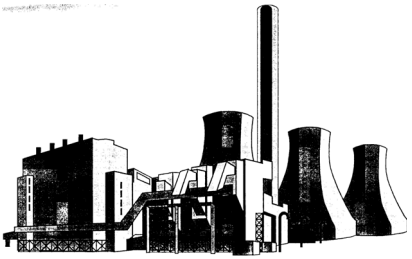
Adoption of presumptive NO_x and SO₂ BART controls

- **Allegheny is concerned with NESCAUM's simplistic assignment of a presumptive 94% NO_x and 95% SO₂ BART control to all eligible sources. This assumption completely ignores the case-by-case engineering analysis of BART options that includes consideration of technical feasibility and cost effectiveness.**
- **As a result, the potential emission reductions from BART-eligible sources is impractical and misleading.**



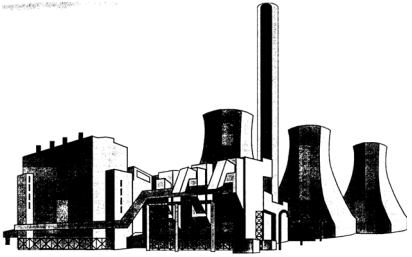
Adoption of presumptive NO_x BART controls

- **Allegheny strongly objects to NESCAUM's recommendation to establish any presumptive NO_x BART requirement.**
- **There is no demonstrated need for such significant NO_x reductions within the MANE-VU region in order to achieve visibility reasonable progress goals for the first ten-year planning period.**



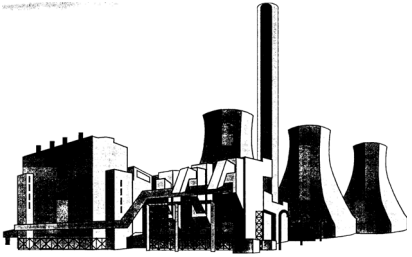
Adoption of presumptive NO_x BART controls

- **Allegheny's engineering/economic analysis of its plants show the cost effectiveness for SCR ranges from \$1,000 to over \$10,000 per ton after installation of low NO_x burners.**
- **Such a wide range demonstrates the need for case-by-case engineering analysis of BART options that includes consideration of technical feasibility and cost effectiveness.**
- **A presumptive NO_x BART based on low NO_x burners and SCR may also be inconsistent with a company's NO_x compliance strategy undertaken for the EPA's NO_x SIP call.**



Adoption of presumptive SO₂ BART controls

- **Allegheny's engineering/economic analysis of its plants show the cost effectiveness for FGD ranges from \$700 to over \$3,000 \$ per ton.**
- **Such a wide range demonstrates the need for case-by-case engineering analysis of BART options that includes consideration of technical feasibility and cost effectiveness.**
- **A presumptive SO₂ BART based on wet FGD may be inconsistent with a company's SO₂ compliance strategy undertaken for Title IV, Phase II.**



In Conclusion

- **There are many interested and knowledgeable stakeholders who would like to provide a positive contribution to the MANE-VU process.**
- **MANE-VU should seek out participation of stakeholders in all future technical projects.**
- **MANE-VU should preserve the states right to conduct case-by-case BART analyses in lieu of presumptive BART.**

