



Environment, Health & Safety

800 Cabin Hill Drive
Greensburg, PA 15601

FEDERAL EXPRESS

October 20, 2005

Mr. Robert Betterton
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304-2345

RE: BART Protocol Comments

Dear Mr. Betterton:

Thank you for the opportunity to review and comment on the BART modeling protocol being considered for use by VISTAS to evaluate visibility impacts of BART-eligible sources. Allegheny Energy does not have any substantive comments on the protocol itself or the appendices provided for review. We do, however, have a question and an assertion that we would like to have answered/discussed relative to the development of BART guidelines, regulations, and/or SIP by the WVDEP.

BART Eligible Units -

Three criteria were listed to consider a unit "BART eligible":

1. constructed between August 7, 1962 and August 7, 1977;
2. combined potential emissions of at least 250 tons per year; and
3. fall within one of the twenty-six designated source categories.

How is the Department defining "constructed"? If ground was broken for the units between the dates specified (1962-1977), does this constitute construction? Otherwise, is 'constructed' a reference to when the units were capable of producing electricity for use on the grid? If it is the former statement, then our Pleasants Power Station Units have been correctly identified as "BART eligible" units. If, however, the latter statement is true, than Pleasants Units 1 and 2 should be removed from the list of eligible units because they became operational in 1978 and 1980, respectively.

Modeling of Units Subject to CAIR

The BART rule allows eligible units exemption from the installation of additional controls if, through modeling with CALPUFF, it is demonstrated that the units have negligible visibility impacts on Class I areas. Failure of the modeling or failure to conduct the modeling will require the installation of BART controls on these units. EPA has claimed, however, that their own modeling has demonstrated that units subject to the CAIR regulations and located in CAIR states that participate in the EPA-administered cap and trade program will achieve greater progress towards improving national visibility than BART alone. Therefore, it seems reasonable and logical that BART-eligible EGU's in West Virginia be allowed to forego the CALPUFF modeling exemption demonstration since they will be subject to CAIR and the Department plans on participating in the CAIR cap and trade program.

Sincerely,

A handwritten signature in cursive script that reads "Randy D. Cain".

Randy D. Cain
Environmental Affairs Manager