



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

April 4, 2012

Glenn Keith  
Department of Environmental Protection  
Bureau of Waste Prevention  
One Winter Street, 7<sup>th</sup> Floor  
Boston, Massachusetts 02108

Dear Mr. Keith:

On December 30, 2011, the Massachusetts Department of Environmental Protection (MassDEP) submitted a Regional Haze State Implementation Plan (SIP) to EPA for approval.

On February 17, 2012, MassDEP proposed revisions to its Regional Haze SIP addressing Best Available Retrofit Technology (BART), as well as revisions to 310 CMR 7.05: Fuels All Districts. Enclosed are EPA's comments on the February 17, 2012 proposals.

MassDEP should address these comments and submit the final SIP to EPA as soon as possible. As you know, EPA must propose action on a Regional Haze SIP, or a Federal Implementation Plan, for Massachusetts by May 15, 2012. If Massachusetts is unable to submit a final SIP by this time, EPA recommends that MassDEP submit the proposed SIP to EPA for parallel processing.

If you have any questions on this issue, please contact Anne McWilliams at (617) 918-1697.

Sincerely,

A handwritten signature in blue ink, appearing to read "D B Conroy".

David B. Conroy  
Chief, Air Programs Branch

Enclosure

cc: Nancy Seidman (MassDEP)

## Enclosure

### **Comments on February 2012 Proposed Revisions to the Massachusetts Regional Haze State Implementation Plan and to 310 CMR 7.05: Fuels All Districts**

#### Regional Haze

- 1) In Tables 16-19, for clarity, EPA suggests that the term “projected” be replaced with the term “estimated.” These emissions are not being projected for a specific future year, but are the estimated reduced emissions resulting from the application of either the BART (Best Available Retrofit Technology) benchmark or alternative BART.
- 2) In Tables 17, 19, and 20, EPA recommends that MassDEP add a column which indicates the enforceable mechanism for the stated SO<sub>2</sub>, NO<sub>x</sub> and PM<sub>10</sub> emission limits, respectively (e.g., 310 CMR 7.19 or 7.29).
- 3) For consistency, in Table 17 the “Alternative BART Emission Rate” for Salem Harbor 2 should be indicated as “Cap”. The 300 tons SO<sub>2</sub> emission cap is the limiting factor as opposed to the emission limit contained in 310 CMR 7.29.
- 4) The first sentence of Section 8.11 states, “MassDEP’s proposed Alternative to BART does not cover PM<sub>10</sub> emissions.” EPA recommends that this statement be clarified to indicate that for PM<sub>10</sub>, MassDEP undertook source-by-source BART determinations.
- 5) MassDEP’s proposal includes several new Appendices, including one rule (i.e., Appendix DD) and several emissions control plan approvals (i.e., Appendices EE through HH). As these items are relied upon by MassDEP to implement BART, these Appendices need to be included in the final SIP revision and incorporated into the Massachusetts SIP. As such, if there are certain provisions of the rule or emission control plans that MassDEP does not want to be incorporated into the SIP, it should make that clear in the SIP revision. Conditions which Massachusetts does not want to incorporate into the SIP should be struck out in the final submittal.
- 6) Since a number of new Tables are being added to Section 8.10 and 8.11 of your Regional Haze SIP, the tables contained in Sections 9 and 10 of your final SIP submitted in December should be revised. This includes the revised “Table 19: Massachusetts Targeted EGUs” in proposed Section 10.5, which should be renumbered as Table 25. The references to Table 19 on pages 16 and 18 should likewise be changed to Table 25.

#### 310 CMR 7.05: Fuels All Districts

- 7) Section 7.05(1)(b)(3) allows exemptions from the stated sulfur in fuel content limits if a facility receives approval from the MassDEP on an alternative plan that would result in no greater sulfur compound emissions. Since MassDEP plans to submit this

rule to EPA as a SIP revision, such alternatives should require approval from MassDEP and EPA.