



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 1  
1 Congress Street, Suite 1100  
BOSTON, MA 02114-2023

FEB 15 2011

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

Dear Mr. Keith:

Previously, EPA provided comments on draft versions of Massachusetts Regional Haze State Implementation Plan (SIP) in letters dated March 24, 2009, and September 17, 2009.

On January 11, 2011, Massachusetts proposed its Regional Haze SIP for public comment. EPA has reviewed this proposal and you will find our comments in the Enclosure.

We urge Massachusetts to address these comments and submit the final SIP to EPA as soon as possible. If you have any questions on this issue, please contact Anne McWilliams at (617) 918-1697.

Sincerely,

A handwritten signature in cursive script that reads "Anne Arnold".

Anne Arnold, Manager  
Air Quality Planning Unit

Enclosure

cc: Eileen Hiney (MA DEP)

**Enclosure**  
**Comments on Massachusetts Proposed Regional Haze State Implementation Plan**  
**Dated January 11, 2011**

Best Available Retrofit Technology (BART)

- 1) On page 73, Massachusetts indicates that General Electric – Lynn has applied for a permit to limit NO<sub>x</sub> and SO<sub>2</sub> emissions to less than 250 tons per year (tpy). In order for the Regional Haze SIP to be fully approvable, these caps must be made federally enforceable.
- 2) Massachusetts proposed BART determination for NO<sub>x</sub> and PM for Wheelabrator-Saugus relies on regulatory revisions to 310 CMR 7.08(2) and 310 CMR 7.19 that are planned for 2011. In addition, page 76 references a NO<sub>x</sub> permit modification that “will be required no later than July 1, 2013.” In order for the Regional Haze SIP to be fully approvable, enforceable emission limits which reflect the BART level of control must be imposed on this facility. MassDEP should include in its final SIP submittal a commitment to adopt and submit these requirements to EPA by a date certain in 2011.
- 3) Massachusetts “Alternative to BART” approach relies on the emission reductions outlined in EPA’s proposed Transport Rule. Although Massachusetts analysis demonstrates that this alternative will achieve greater emission reductions than source-by-source BART, EPA will not be able to fully approve Massachusetts Regional Haze SIP until the final Transport Rule has been promulgated.
- 4) On January 7, 2011, EPA issued “Notice of Data Availability (NODA) for Federal Implementation Plans To Reduce Interstate Transport of Fine Particulate Matter and Ozone: Request for Comment on Alternative Allocations, Calculation of Assurance Provision Allowance Surrender Requirements, New-Unit Allocations in Indian Country, and Allocations by States.” (See 76 FR 1109.) In this NODA, EPA is proposing revised SO<sub>2</sub> and NO<sub>x</sub> emission allocations for units subject to the Transport Rule. MassDEP should update its proposed “Alternative to BART” demonstration to incorporate this new information. It appears that the “better than BART” conclusion is still valid with the revised allocations.
- 5) In order to enhance the discussion on page 82, EPA recommends that MassDEP include a graphic demonstrating the similar geographic distribution of the sources subject to BART and the sources included in the “Alternative to BART” demonstration.

Other Comments

- 6) On page 37, Massachusetts states “Version 3 of the 2002 base year emission inventory was used in the regional air quality modeling simulation” and that

Massachusetts subsequently revised its inventory of area source heating oil emissions. Specifically, on page 45, footnote 2 indicates that SO<sub>2</sub> area source emissions were corrected from 54,924 tpy to 25,585 tpy. This is a significant revision. Were any of the contribution assessments for Massachusetts that are discussed in Section 7.2 recalculated to determine the impact of this correction?

- 7) On page 44, it is unclear why carbon monoxide (CO) is included in the 2002 base year and 2018 projected emissions in Table 8. CO reductions should not be included in the calculation of projected reductions of total regional haze pollutants (currently estimated with CO to be 31 percent). The Table 8 calculation should be corrected and the page 117 reference to a 31 percent reduction should also be revised accordingly.
- 8) On page 48, the arrow in Figure 19 should be moved to align with MA instead of IL.
- 9) As noted above, EPA's January 7, 2011 NODA includes revised SO<sub>2</sub> allocations for units subject to the Transport Rule. Therefore, MassDEP should update Table 25 on page 110 to incorporate these revised SO<sub>2</sub> allocations. It appears that the 90 percent SO<sub>2</sub> reduction for the "Targeted EGU Strategy" will still be met with the revised allocations.
- 10) Massachusetts proposed Regional Haze SIP includes a demonstration that the MANE-VU low sulfur fuel oil strategy is reasonable. This strategy includes:
  - the reduction in the sulfur content of distillate (#1 and #2) fuel oils to 0.05% sulfur by weight by no later than 2014;
  - the reduction in the sulfur content of #4 residual oil to 0.25-0.5% sulfur by weight by no later than 2018;
  - the reduction of #6 residual oil to no greater than 0.5% sulfur by weight by no later than 2018; and
  - the further reduction of distillate oil to 15 ppm by 2018.

Massachusetts, however, has not yet adopted a regulation imposing these requirements. On page 117 of the proposed SIP, Massachusetts states, "MassDEP intends to promulgate regulatory revisions to 310 CMR 7.05 in 2011 to implement the low sulfur fuel strategy in accordance with the MANE-VU Statement." MassDEP should include in its final SIP submittal a commitment to adopt and submit a final rule to EPA by a date certain in 2011.