



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 1**

**5 Post Office Square, Suite 100**

**Boston, MA 02109-3912**

May 14, 2021

Mark Wert  
Branch Chief, Air Planning  
Massachusetts Dept. of Environmental Protection  
One Winter Street, 6<sup>th</sup> floor  
Boston, MA 02108

Dear Mr. Wert:

On April 7, 2021, Massachusetts Department of Environmental Protection (Mass DEP) proposed for public comment the Massachusetts Regional Haze Plan for the Second Implementation Period (2018 – 2028). Previously, on January 6, 2021, EPA provided comments on the draft Regional Haze Plan. Mass DEP addressed most of our comments. We have reviewed the proposal and enclosed our comments. If you have any questions, please contact Anne McWilliams at 617-918-1697.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Rogan", is positioned above the typed name.

John Rogan, Manager  
Air Quality Branch

Enclosures

**Enclosure**  
**Comments on Massachusetts' April 7, 2021 Proposed Massachusetts Regional Haze State Implementation Plan Revision Second Planning Period (2018 – 2028)**

*1. 1.5 Class I Areas (p. 12)*

- Add Brigantine Wildlife Refuge (New Jersey)

*2. Visibility Trends (p. 18)*

- Table 2-1, Baseline, Current, and Reasonable Progress Goal Haze Index Levels for Class I Areas In or Adjacent to the MANE-VU Region, while the columns labeled RPG (2028)(dv) might be the 2028 Control Projections, it should not be labeled as RPG. Massachusetts does not know, at this time, the RPGs for the Class I areas outside of MANE-VU.

*3. Implementing the 2017 MANE-VU Statement (p. 76-80)*

- Based on the 4-factor analysis for Canal 1, Mass DEP determined that the cost of switching to 0.3% sulfur No. 6 fuel would cost \$10,000 per ton of SO<sub>2</sub> removed and was not reasonable. On page 76, Mass DEP states that the facility purchases 0.3wt% sulfur No. 6 to meet the 6.0 lbs/MW-hr monthly, 3.0 lbs/MW-hr rolling 12-month SO<sub>2</sub> limit applicable under 310 CMR 7.29. On page 77, the footnote states that all of the projected reductions are due to Ask 2 since Ask 3 (0.5% sulfur fuel) has no impact since Canal is burning 0.3% sulfur fuel. Finally, Mass DEP indicated that Canal will commit to purchasing 0.3% sulfur No.6 fuel oil following the depletion of the current fuel inventory. It is unclear why the cost of switching to 0.3% sulfur No. 6 fuel would cost \$10,000 per ton SO<sub>2</sub> removed when the facility is already using 0.3% sulfur fuel. Mass DEP should make the use of 0.3% sulfur No.6 fuel federally enforceable.
- For Ask 5 c., what is the significance of the date of May 1, 2007, and therefore the reasoning for identifying units which commenced operation prior to this date?