

## Wert, Mark (DEP)

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**From:** Wert, Mark (DEP)  
**Sent:** Tuesday, July 28, 2020 5:23 PM  
**To:** Shepherd, Don  
**Cc:** Salazer, Holly; Peters, Melanie; King, Kirsten L; Anne McWilliams; Keith, Glenn (DEP)  
**Subject:** RE: updated list of MA facilities for 4-factor analyses

Hi Don . . .

Thank you for the updated emissions/calculations.

Since your list is now narrowed down to the MWCs note that new Emissions Control Plans (ECPs) for the MWCs were recently finalized under our 2018 RACT rule that established lower emissions limits (the basis for the rule is explained in the rule's Background Document - I've provided the link again below).

You can find the ECPs that were issued at: <https://eeaonline.eea.state.ma.us/EEA/PublicApp/>

Please let me know if you have any questions and or need additional information and or if you would like to set up a call to discuss.

### New RACT Rules

MassDEP updated its NOx RACT rules on March 9, 2018. Units covered included boilers, turbines, and MWCs. The links to documentation are below:

Rules: <https://www.mass.gov/regulations/310-CMR-700-air-pollution-control>  
<https://www.mass.gov/media/1596301/>

Background documents:  
<https://www.mass.gov/media/1898906>  
<https://www.mass.gov/media/1898911> (MWCs)

Mark . . .

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**From:** Shepherd, Don <Don\_Shepherd@nps.gov>  
**Sent:** Friday, July 17, 2020 2:44 PM  
**To:** Wert, Mark (DEP) <mark.wert@mass.gov>  
**Cc:** Salazer, Holly <Holly\_Salazer@nps.gov>; Peters, Melanie <Melanie\_Peters@nps.gov>; King, Kirsten L <kirsten\_king@nps.gov>; Anne McWilliams <mcwilliams.anne@epa.gov>  
**Subject:** updated list of MA facilities for 4-factor analyses

Hi Mark,

As promised, i have attached a workbook that tries to address your questions about how we compiled our lists of facilities for MANE-VU and, particularly, MA.

The first "ACAD" tab is simply our data dump from the 2014 NEI of all facilities within 1000 km of ACAD and the calculated Q/d values for each. (Q = tpy of SO<sub>2</sub> + NO<sub>x</sub>.)

The next tab shows how we ranked those facilities (after we eliminated airports and rail yards) by Q/d. Please note that the 80% contribution running total/total breakpoint occurred between Q/d of 0.67e4 vs 0.673. (Please recall that, when the initial lists were compiled, EPA's draft guidance was to capture 80% of the impacts.)

The next tab shows the results of this method for all MANE-VU states. (I shall try to send similar lists for other RPOs next week.)

The next tab is just the MA list pulled from the MANE-VU list (based on the 2014 NEI & 2017 CAMD).

Next is the 2017 NEI for MA.

Followed by MA 29019 CAMD.

The last "MA 2017 & 2019 CAMD" tab substitutes the newer data into the old MA list and re-ranks all by Q/d. The facilities highlighted in yellow now fall below our previous Q/d cut-off and can be deleted from our list. Although NEA Bellingham is still above our original cut-off and i did not mark it for deletion, we would be OK if MA chooses to eliminate it from 4-factor analysis because of the very clear "break" to the next facility up the list.

It looks like we could end up with just the four MWCs at the top of the list and it is my understanding that MA is working on RACT regs that would reduce their emissions. I would appreciate it if you would let us know more about that effort so we can all factor that into this RP planning process.

Please feel free to contact me (303-859-0242) if you have any questions.