

Wert, Mark (DEP)

From: Wert, Mark (DEP)
Sent: Wednesday, December 16, 2020 11:52 AM
To: 'Shepherd, Don'
Cc: Keith, Glenn (DEP); Morin, Joanne O (DEP); McWilliams, Anne K.; Stacy, Andrea; jash@fs.fed.us; Copeland@cira.colostate.edu; 'baanderson02@fs.fed.us'; King, Kirsten L; Geiser, Linda -FS; Allen, Tim; Peters, Melanie; rperron@fs.fed.us; Salazer, Holly
Subject: RE: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM
Attachments: FLM list Nov 23 2020 - response Dec 16.docx

Hi Don . . .

Please see attached table of information on the MWCs and let us know if you would like anything additional or have questions.

Mark . . .

Mark Wert
Branch Chief, Air Planning
Massachusetts Dept. of Environmental Protection -- BAW
One Winter Street, 6th floor, Boston, MA 02108
617-292-5598 (o) / 857.891.7532 (c)

From: Shepherd, Don <Don_Shepherd@nps.gov>
Sent: Monday, November 23, 2020 9:37 AM
To: Wert, Mark (DEP) <mark.wert@mass.gov>; Salazer, Holly <Holly_Salazer@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Allen, Tim <tim_allen@fws.gov>; rperron@fs.fed.us; Copeland@cira.colostate.edu; 'baanderson02@fs.fed.us' <baanderson02@fs.fed.us>; Geiser, Linda - FS <linda.geiser@usda.gov>; jash@fs.fed.us
Cc: Keith, Glenn (DEP) <glenn.keith@mass.gov>; Morin, Joanne O (DEP) <Joanne.O.Morin@mass.gov>; McWilliams, Anne K. <mcwilliams.anne@epa.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>
Subject: Re: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM

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Hello Mark,

Thanks for sending the Massachusetts pre-proposal draft Regional Haze SIP. I have a few initial comments.

Since Brayton Point was retired in 2017, i do not think its closure can be used to offset other emissions during this planning period.

I have attached NPS's final list of facilities for potential 4-factor analyses, which now consists of four Municipal Waste Combustors (MWCs). The permits for these MWCs include spray dry absorbers for acid gas

control and SNCR for NOx control. According to EPA Guidance, sources with effective emission controls may not need to conduct a 4-factor analysis. Please provide information describing the effectiveness of the SO2 and NOx controls on the four MWC's contained in the attached list. It would also be helpful if you would provide information on any new regulations that may further reduce emissions from these MWCs during this planning period.

Please let me know if you have any questions or comments.

thanks,

From: Wert, Mark (DEP) <mark.wert@state.ma.us>

Sent: Friday, November 13, 2020 1:55 PM

To: Salazer, Holly <Holly_Salazer@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Allen, Tim <tim_allen@fws.gov>; rperron@fs.fed.us <rperron@fs.fed.us>; Copeland@cira.colostate.edu <Copeland@cira.colostate.edu>; 'baanderson02@fs.fed.us' <baanderson02@fs.fed.us>; Geiser, Linda -FS <linda.geiser@usda.gov>; jash@fs.fed.us <jash@fs.fed.us>

Cc: Keith, Glenn (DEP) <glenn.keith@state.ma.us>; Morin, Joanne O (DEP) <joanne.o.morin@state.ma.us>; Shepherd, Don <Don_Shepherd@nps.gov>; McWilliams, Anne K. <mcwilliams.anne@epa.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>

Subject: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM

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TO: Federal Land Managers

Attached is a pre-proposal draft of the MassDEP regional haze SIP for 2018-2028 for your review and comment to fulfill the 60 day consultation requirements of 40 CFR Section 51.308(i)(2). The appendices are accessible at this link:

<https://www.mass.gov/doc/appendices-to-the-massdep-regional-haze-sip-for-2018-2028-draft>

Please provide us with your comments by January 15, 2021.

Please let us know if you wish to schedule an "in person" video meeting to discuss the pre-proposal draft Massachusetts regional haze SIP.

Mark . . .

Mark Wert
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Distribution List

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Effectiveness of SO₂ and NO₂ Controls on MWCs Identified by FLMs

Facility Name	Current Controls	SO ₂ limits / Control effectiveness	NO _x limits / Control effectiveness*	Notes
SEMASS PARTNERSHIP	ECP approved 2/11/20 All units: SNCR, SDA Acid Gas Control	Less stringent of 29 ppm or 75% reduction	146 ppm (est. 45% reduction)	ECP under appeal (unrelated to SO ₂ / NO _x limits)
WHEELABRATOR MILLBURY INC	ECP approved 2/11/20 All units: SNCR, SDA Acid Gas Control	Less stringent of 29 ppm or 75% reduction	150 ppm (est. 35% reduction)	ECP under appeal (unrelated to SO ₂ / NO _x limits)
WHEELABRATOR NORTH ANDOVER INCORPORATED	ECP approved 2/11/20 Both units: SNCR, SDA Acid Gas Control	Less stringent of 29 ppm or 75% reduction	150 ppm (est. 35% reduction)	ECP under appeal (unrelated to SO ₂ / NO _x limits)
WHEELABRATOR SAUGUS INC	ECP approved 2/11/20 Both units: SNCR, SDA Acid Gas Control	Less stringent of 29 ppm or 75% reduction	150 ppm (est. 35% reduction)** 185 ppm (30-day)(BART) (est. 20% reduction)	ECP under appeal (unrelated to SO ₂ / NO _x limits)

MWCs identified in email from NPS (D. Shepard) to MassDEP (M.Wert) November 23, 2020.

* NO_x control effectiveness is minimum effectiveness needed to reduce estimated uncontrolled emissions to meet the emissions limit. The basis for control effectiveness is uncontrolled values of 265 ppm (Rdf - SEMASS) and 231 ppm (mass burn – Wheelabrator units) derived from AP-42 Ch 2 Sec 1. Note that the facilities over-control to maintain a margin of compliance so that actual control effectiveness is likely greater than shown.

** Wheelabrator Saugus is able to use Emission Reduction Credits to meet 150 ppm emissions limit.

FLM list Nov 23 2020 - response Dec 16.docx