



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

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July 9, 2020

Stonepeak Infrastructure Partners  
Attention: George Watts – Managing Director  
55 Hudson Yards 550 West 34<sup>th</sup> Street  
48<sup>th</sup> Floor New York, NY 10001

Dear Mr. Watts:

The Massachusetts Department of Environmental Protection (MassDEP) is working to implement the U.S. Environmental Protection Agency's (EPA) Regional Haze Rule for the second planning period (2018 – 2028) and has determined that a four-factor analysis is required for Canal Generating Station Unit 1 (Canal Station), 9 Freezer Road, Sandwich, Massachusetts under federal Clean Air Act, 42 U.S.C. § 7491, and implementing regulations at 40 CFR §§ 51.309 (Regional Haze Rule). The four-factor analysis is necessary for MassDEP to evaluate and implement reasonable measures to address visibility impairment in federal Class I areas.

The federal Clean Air Act and Regional Haze Rule [40 CFR 51.308(f)(2)(i) through (iv)] require states that are reasonably anticipated to cause or contribute to impairment of visibility in mandatory Class I Federal areas to implement reasonable emission reduction measures to reduce visibility impairment. As part of the Massachusetts Regional Haze State Implementation Plan (SIP), Massachusetts must consider emission reduction measures identified by Class I States as being necessary to make reasonable progress in any Class I area. Massachusetts is part of the Mid-Atlantic Northeast Visibility Union (MANE-VU), in which the member states work collaboratively to develop emission reduction measures to address visibility impairment in Class I areas. On August 25, 2017, MANE-VU issued a statement in which the member states committed to pursue six emission management strategies to meet the 2028 reasonable progress goal for regional haze (see attached MANE-VU Statement). Strategy #2 in the MANE-VU Statement identifies emissions sources modeled by MANE-VU that have the potential for 3.0

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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Mm<sup>-1</sup> or greater visibility impacts at any MANE-VU Class I area, and requires a four-factor analysis for these emissions sources to evaluate whether installation or upgrade of emission control measures are reasonable. Canal Station Unit 1 is listed under Strategy #2 based on MANE-VU's contribution assessment modeling (see list of sources in Attachment 1 of the MANE-VU Statement).

In order to fulfill MassDEP's obligations under EPA's Regional Haze Rule and consistent with the MANE-VU Statement, MassDEP requests that by September 18, 2020, Canal Station conduct a four-factor analysis that evaluates emission reduction measures for nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and particulate matter in accordance with 40 CFR § 308(f)(2)(i) and consistent with EPA guidance. The four-factor analysis considers emission reduction measures based on (1) the cost of compliance; (2) the time necessary for compliance; (3) the energy and non-air quality environmental impacts of compliance; and (4) the remaining useful life of an existing source subject to this requirement.

Following submission of Canal Station's four-factor analysis, MassDEP will evaluate whether any of the identified emission reduction measures are reasonable. MassDEP will include any identified reasonable control emission reduction measures into its draft Regional Haze SIP. After a public comment period, MassDEP will finalize its Regional Haze SIP and submit it to EPA for approval by the Regional Haze Rule deadline of July 31, 2021.

Thank you in advance for your cooperation. If you have any questions or wish to discuss this request, please contact me at 617-292-5874.

Sincerely,



Glenn Keith  
Director  
Air and Climate Programs

cc: Marc Wolman, Chief, Stationary Sources Branch, MassDEP  
Seth Pickering, Deputy Regional Director, MassDEP Southeast Regional Office  
Thomas Cushing, Chief, Air Permits, MassDEP Southeast Regional Office