

Wert, Mark (DEP)

From: Wert, Mark (DEP)
Sent: Monday, January 4, 2021 4:38 PM
To: 'Perron, Ralph -FS'
Cc: Keith, Glenn (DEP); Morin, Joanne O (DEP); McWilliams, Anne K.; Stacy, Andrea; Copeland@cira.colostate.edu; Anderson, Bret A -FS; King, Kirsten L; Shepherd, Don; Geiser, Linda -FS; Allen, Tim; Peters, Melanie; Salazer, Holly; Braczyk, Edward (DEP); Buttarro, Cosmo (DEP); Wolman, Marc (DEP)
Subject: RE: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM
Attachments: MA MWC Emissions Trends.docx; MA MWC Actual Emissions and Rates 2018.docx

Hi Ralph . . .

Yes, this table along with other responses and documentation of our consultation will be included in the SIP in both the body and as appendices.

- Mystic 7 is dual fueled (natural gas and No.6 oil – 0.5% sulfur) – records indicate that both fuels have been in use since at least 2004. Up to 2005 it also burned No.2 oil. The ratio of oil to NG fuel used has changed substantially over the years. My most recent communications with the facility indicate that they expect to continue with oil as a large percentage of their fuel. Their latest Source Registration report indicates that controls are DESP and low NOx burners. Mystic 7 (DEP EU#4) is expected to retire in May 2021. (see attached August 2020 statement from <https://www.exeloncorp.com/newsroom/statement-regarding-the-retirement-of-mystic-generating-station-in-2024>)
- Covanta Haverhill Unit 1 SNCR was installed on 11/1/2000 and the WET LIME SLURRY SCRUBBING on 12/24/2002 . Unit 2 SNCR and WET LIME SLURRY SCRUBBING were both installed on 12/24/2002. These dates are from their Source Registration report for 2019.
- The eGRID data appears to come from EIA which uses a model to estimate SO2 and NOx emissions ([Emissions by plant and by region \(eia.gov\)](#)). This model is quite a bit off for SO2 – see table below with data from the facility's Source Registration reports to MassDEP. Attached are additional Source Registration emissions report data for all of these facilities.

The corrected SO2 emissions rate for Covanta Haverhill for 2018 would be (96 tons*2000 lbs) / 5,363,163 mmbtu = 0.0358 lbs/mmbtu

See attached 2018 emission rates for all of these facilities provided by our Northeast Region.

plant	eGRID 2018 tons SO2	MassDEP 2018 tons SO2	eGRID 2018 tons NOx	MassDEP 2018 tons NOx
Covanta Haverhill	505	96	871	996
SEAMASS	905	363	1,625	1511
Wheelabrator Millbury	102	166	847	865
Wheelabrator N Andover	97	72	781	743

Wheelabrator Saugus	128	16	683	639
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Mark . . .

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From: Perron, Ralph -FS <ralph.perron@usda.gov>
Sent: Monday, December 21, 2020 3:07 PM
To: Wert, Mark (DEP) <mark.wert@mass.gov>
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>; Copeland@cira.colostate.edu; Anderson, Bret A -FS <bret.a.anderson@usda.gov>; King, Kirsten L <kirsten_king@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Geiser, Linda -FS <linda.geiser@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Salazer, Holly <Holly_Salazer@nps.gov>
Subject: RE: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM

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Hi Mark,

Thanks for the quick response. Can this table and some discussion regarding the five MWCs be added into the body of the RH SIP, perhaps in section 5.4?

I've got a couple of other questions to help me understand some of the more recent control upgrades.

- Mystic Station Unit 7 was discussed a bit in the RH SIP, including a mention in Table 3-1, with a note about the fuel being residual oil in 2014. In the EPA egrid webpage 2016 (link in previous email), the fuel source is listed as Natural Gas, with controls for SO₂ and NO_x being listed as NA. Did Mystic Station Unit 7 switch to Natural Gas, and if yes, when? What controls are currently in place and being used year round for Mystic 7?
- Covanta Haverhill: when were the SNCR and SDA units installed and fully operational year round? What is the emission rate for SO₂? The 2016 egrid webpage lists this rate as 0.188 for Covanta Haverhill, while the rate is listed at 0.03 for the both of Wheelabrator Millbury units.

Thanks,
Ralph

From: Wert, Mark (DEP) <mark.wert@state.ma.us>
Sent: Monday, December 21, 2020 12:52 PM
To: Perron, Ralph -FS <ralph.perron@usda.gov>
Cc: Keith, Glenn (DEP) <glenn.keith@state.ma.us>; Morin, Joanne O (DEP) <joanne.o.morin@state.ma.us>; McWilliams, Anne K. <mcwilliams.anne@epa.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Copeland@cira.colostate.edu;

Anderson, Bret A -FS <bret.a.anderson@usda.gov>; King, Kirsten L <kirsten_king@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Geiser, Linda -FS <linda.geiser@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Salazer, Holly <Holly_Salazer@nps.gov>

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

Hi Ralph . . .

We have added the information on Covanta Haverhill to the attached revised list.

Please let us know if you need anything additional.

Mark . . .

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From: Perron, Ralph -FS <ralph.perron@usda.gov>

Sent: Monday, December 21, 2020 8:33 AM

To: Wert, Mark (DEP) <mark.wert@mass.gov>; Shepherd, Don <Don_Shepherd@nps.gov>

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>; Copeland@cira.colostate.edu; Anderson, Bret A -FS <bret.a.anderson@usda.gov>; King, Kirsten L <kirsten_king@nps.gov>; Geiser, Linda -FS <linda.geiser@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Salazer, Holly <Holly_Salazer@nps.gov>

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

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Hi Mark,

Can you add another row to this table and share more information about the Covanta Haverhill MWC units? Looking at these two units in egrid, they appear to have the least effective performance measure as compared to the other MWC units in Massachusetts (US Environmental Protection Agency. 2020. Emissions & Generation Resource Integrated Database (eGRID) [Web Page]. Located at: <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>).

Thanks



Ralph Perron
Air Quality Specialist

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From: Wert, Mark (DEP) <mark.wert@state.ma.us>
Sent: Wednesday, December 16, 2020 11:52 AM
To: Shepherd, Don <Don_Shepherd@nps.gov>
Cc: Keith, Glenn (DEP) <glenn.keith@state.ma.us>; Morin, Joanne O (DEP) <joanne.o.morin@state.ma.us>; McWilliams, Anne K. <mcwilliams.anne@epa.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Ash, Jeremy - FS <jeremy.ash@usda.gov>; Copeland@cira.colostate.edu; Anderson, Bret A -FS <bret.a.anderson@usda.gov>; King, Kirsten L <kirsten_king@nps.gov>; Geiser, Linda -FS <linda.geiser@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Perron, Ralph -FS <ralph.perron@usda.gov>; Salazer, Holly <Holly_Salazer@nps.gov>
Subject: RE: [EXTERNAL] MassDEP Regional Haze SIP for 2018-2028 - Pre-proposal DRAFT to FLM

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 . . .

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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 . . .

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USFS	Ralph Perron	

Emissions Trends for Facilities Identified in FLM Comments (tons/yr)

Facility Name	AQID	Pollutant	2008	2011	2015	2018	2019
SEMASS PARTNERSHIP – SE	1200001	SO ₂	523	451	192	362	378
WHEELABRATOR MILLBURY INC – CE	1180419	SO ₂	139	225	224	166	147
WHEELABRATOR NORTH ANDOVER INCORPORATED – NE	1210261	SO ₂	58	38	51	72	82
WHEELABRATOR SAUGUS INC – NE	1197654	SO ₂	55	31	54	16	33
COVANTA HAVERHILL -- NE	1210007	SO ₂	71	74	12	96	104
SEMASS PARTNERSHIP	1200001	NO _x	1384	1259	1249	1511	1434
WHEELABRATOR MILLBURY INC	1180419	NO _x	814	865	873	865	863
WHEELABRATOR NORTH ANDOVER INCORPORATED	1210261	NO _x	781	768	738	743	815
WHEELABRATOR SAUGUS INC	1197654	NO _x	722	705	667	640	578
COVANTA HAVERHILL -- NE	1210007	NO _x	897	1021	986	996	989

Source: MassDEP Source Registration data (qry_FLM facility emissions x-tab)
 In response to email to MassDEP (M.Wert) from NFS (R.Perron) December 21, 2020.

MA MWC Unit Emission Rates for 2018 for Facilities Identified in FLM Comments (lbs/ton)

2018 Actual Emissions							
Facility Name	AQID	Design Capacity	Pollutant	2018 Actual Emissions All Units, TPY	2018 Unit Specific Actual Emissions, TPY	2018 Unit Specific MSW Burned, TPY	2018 Unit Specific Emission Rate, lb/Ton MSW Burned
SEMASS PARTNERSHIP – SE	1200001	3 units, 375 MMBtu/hr each	SO ₂	362	U1 - 149.9 U2 - 133.0 U3 - 79.4	U1 – 338,213 U2 – 362,002 U3 – 375,297	U1 - 0.8820 U2 – 0.7280 U3 – 0.4220
WHEELABRATOR MILLBURY INC – CE	1180419	2 units, 323 MMBtu/hr each	SO ₂	166	U1 - 82.4 U2 - 83.2	U1 - 236,036 U2 - 245,428	U1 - 0.6985 U2 - 0.6781
WHEELABRATOR NORTH ANDOVER INCORPORATED – NE	1210261	2 units, 288.4 MMBtu/hr each	SO ₂	72	U1 - 28.8 U2 - 43.0	U1 - 229,001 U2 - 227,852	U1 - 0.2516 U2 - 0.3772
WHEELABRATOR SAUGUS INC – NE	1197654	2 units, 325 MMBtu/hr each	SO ₂	16	U1 - 9.1 U2 - 7.0	U1 - 211,926 U2 - 219,763	U1 - 0.0861 U2 - 0.0636
COVANTA HAVERHILL -- NE	1210007	2 units, 381.56 MMBtu/hr each	SO ₂	96	U1 - 49.5 U2 - 46.6	U1 - 295,011 U2 - 299,073	U1 - 0.3356 U2 - 0.3116
SEMASS PARTNERSHIP	1200001	3 units, 375 MMBtu/hr each	NO _x	1511	U1 – 569.4 U2 – 550.2 U3 – 389.3	U1 – 338,213 U2 – 362,002 U3 – 375,297	U1 – 3.3890 U2 – 3.0360 U3 – 2.0700
WHEELABRATOR MILLBURY INC	1180419	2 units, 323 MMBtu/hr each	NO _x	865	U1 – 431.9 U2 – 430.9	U1 - 236,036 U2 - 245,428	U1 – 3.6592 U2 – 3.5113
WHEELABRATOR NORTH ANDOVER INCORPORATED	1210261	2 units, 288.4 MMBtu/hr each	NO _x	743	U1 – 363.6 U2 – 379.0	U1 - 229,001 U2 - 227,852	U1 – 3.1758 U2 – 3.3271
WHEELABRATOR SAUGUS INC	1197654	2 units, 325 MMBtu/hr each	NO _x	640	U1 – 304.1 U2 – 323.7	U1 - 211,926 U2 - 219,763	U1 – 2.8697 U2 – 2.9459
COVANTA HAVERHILL -- NE	1210007	2 units, 381.56 MMBtu/hr each	NO _x	996	U1 – 499.2 U2 – 494.4	U1 - 295,011 U2 - 299,073	U1 – 3.3843 U2 – 3.3062

Source: MassDEP Source Registration data

MA MWC Facility Emission Rates for 2018 for Facilities Identified in FLM Comments (lbs/MMBtu)

2018 Actual Emissions							
Facility Name	AQID	Design Capacity	Pollutant	2018 Actual Emissions All Units, TPY	2018 MSW Burned All Units, TPY	2018 MSW Heat Input, MMBtu	2018 Actual Emission Rate, lb/MMBtu
SEMASS PARTNERSHIP – SE	1200001	3 units, 375 MMBtu/hr each	SO ₂	362	1,075,512	9,679,608	0.0748
WHEELABRATOR MILLBURY INC – CE	1180419	2 units, 323 MMBtu/hr each	SO ₂	166	481,464	4,333,176	0.0766
WHEELABRATOR NORTH ANDOVER INCORPORATED – NE	1210261	2 units, 288.4 MMBtu/hr each	SO ₂	72	456,853	4,111,677	0.0350
WHEELABRATOR SAUGUS INC – NE	1197654	2 units, 325 MMBtu/hr each	SO ₂	16	431,689	3,885,201	0.0082
COVANTA HAVERHILL -- NE	1210007	2 units, 381.56 MMBtu/hr each	SO ₂	96	594,084	5,346,756	0.0359
SEMASS PARTNERSHIP	1200001	3 units, 375 MMBtu/hr each	NO _x	1511	1,075,512	9,679,608	0.3122
WHEELABRATOR MILLBURY INC	1180419	2 units, 323 MMBtu/hr each	NO _x	865	481,464	4,333,176	0.3992
WHEELABRATOR NORTH ANDOVER INCORPORATED	1210261	2 units, 288.4 MMBtu/hr each	NO _x	743	456,853	4,111,677	0.3614
WHEELABRATOR SAUGUS INC	1197654	2 units, 325 MMBtu/hr each	NO _x	640	431,689	3,885,201	0.3295
COVANTA HAVERHILL -- NE	1210007	2 units, 381.56 MMBtu/hr each	NO _x	996	594,084	5,346,756	0.3726

Assumes 4,500 Btu/lb MSW from AP-42

Source: MassDEP Source Registration data

NEWSROOM

Statement regarding the retirement of Mystic Generating Station in 2024

AUGUST 21, 2020

Mystic Generating Station has a long and proud history of keeping the lights on in Greater Boston and beyond, dating back to the Second World War. We appreciate FERC's consideration of our complaint that challenged the process ISO-NE is using to replace Mystic's reliability benefits to Boston, and while we disagree with their order, we accept it. As a result of the order, we currently do not see a path to continue commercial electric generation at Mystic Generating Station Units 8 and 9 after the Cost of Service agreement expires on May 31, 2024; consequently, we will retire Mystic 8 and 9 at that time. This decision does not impact Mystic Unit 7 and Mystic Jet which will cease operations by May 31, 2021.

We have not made a decision to retire Exelon Generation's nearby Everett Liquefied Natural Gas ("LNG") Facility (Everett). We are continuing to evaluate Everett's future and are hopeful that it will continue to operate following Mystic's retirement. Everett is strategically located, with interconnections to two interstate pipelines and a natural gas distribution system, and a large LNG trucking operation. Marketers and utilities in the Northeast have relied on LNG from Everett for decades as an integral peaking fuel to supplement their pipeline supplies.

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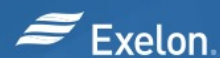
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