



United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225-0287

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October 22, 2018

Christine Kirby, Director, Air and Climate Programs
Massachusetts Department of Environmental Protection
One Winter Street, 7th Floor
Boston, MA 02108

Dear Ms. Kirby:

As part of Massachusetts' development of a state implementation plan (SIP) for the second regional haze planning period (2018-2028), the National Park Service Air Resources Division would like to initiate consultation with the Massachusetts Department of Environmental Protection (MDEP) to discuss which facilities the state is considering for possible future emission reductions.

Over the past 18 months, Massachusetts and the other MANE-VU states have completed a visibility contribution assessment (led by Toms Downs, MEDEP¹), conducted facility screening analyses, and developed the MANE-VU Ask for Midwestern and eastern states to consider emission reduction measures for specific facilities and source categories by 2028. The Federal Land Managers (FLM) commented to MANE-VU on these technical analyses in 2016, 2017, and 2018.

In a letter dated April 12, 2018, the Air Resources Division provided MANE-VU with a list of facilities covering the MANE-VU states for discussion. Based on a signed but undated letter from MANE-VU, MANE-VU asked us to discuss source selection with individual states. Hence, our outreach to you via this letter.

As part of the FLM consultation process, we generated the attached list of facilities for consideration as the state prepares its reasonable progress SIP under the Regional Haze Rule. We would like to discuss this list in light of Massachusetts' list of sources for four factor analyses. The NPS developed the attached list of facilities using a Class I centric approach; that is, we

¹ Tom Downs, Maine Department of Environmental Protection (ME DEP). 2018. Mid-Atlantic/Northeast U.S. Visibility Data 2004-2016 (2nd RH SIP Metrics)

looked at the impact of eastern facilities on Acadia National Park (ACAD) and Shenandoah National Park (SHEN), the NPS Class I areas located in or nearest the MANE-VU states. For each NPS Class I area, we identified the facilities associated with contributing 80% of the impacts. In keeping with EPA's guidance, we adjusted the inventory to reflect those facilities that had been controlled, shut down, or changed fuels.

EPA 2016 draft guidance section 6.3 (p. 72)² states:

Regardless of how it has selected its screening threshold for visibility impacts, the state should demonstrate that its threshold, in combination with other aspects of its screening approach, results in the screening process selecting for full analysis and decision a combination of major stationary sources, minor stationary sources and minor/area stationary source categories that collectively account for a reasonably large fraction of all the in-state major, minor and area stationary source emissions contributing to any PM species that is a significant portion of the anthropogenic extinction budget....The EPA considers 80 percent to be a reasonably large fraction for this purpose in the second planning period.

We would like to arrange a conference call with you in the next month to go over the facilities on our list that are located in Massachusetts to determine if those facilities are also on your list. Specifically we would like to discuss how the emissions from these facilities will change between 2018 and 2028 and which facilities will be evaluated as part of the state's long term strategy supporting continued visibility improvement in the Class I areas in MANE-VU states. Our goal is to better understand the MDEP's approach to this next round of regional haze planning.

We appreciate the opportunity to work with the MDEP to improve visibility in Class I national parks and wilderness areas. If you have questions, please contact Pat Brewer at 303-969-2153 or patricia_f_brewer@nps.gov.

Sincerely,



Carol McCoy
Chief, Air Resources Division

Attachment

Facilities potentially contributing to visibility impacts at Acadia or Shenandoah National Parks, using $Q = \text{combined NO}_x, \text{PM}_{2.5}, \text{SO}_2 \text{ and } \text{SO}_4 \text{ emissions by facility from the 2014 version 2 National Emissions Inventory or EPA's 2017 Clean Air Markets Database divided by } d = \text{distance from the facility to the nearest boundary of the national park.}$

² U.S. EPA 2016 Draft Guidance on Progress Tracking Metrics, Long-term Strategies, Reasonable Progress Goals and Other Requirements for Regional Haze State Implementation Plans for the Second Implementation Period.

Year	Inventory	EIS ID	Facility Name	NAICS Code Description	Latitude	Longitude	State	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
2014	NEI	8127611	SEMASS PARTNERSHIP	Solid Waste Combustors and Incinerators	41.802	-70.788	MA	1,616	301	5.37	ACAD
2014	NEI	7869811	WHEELABRATOR MILLBURY INC	Solid Waste Combustors and Incinerators	42.221	-71.767	MA	1,257	322	3.91	ACAD
2014	NEI	7947211	WHEELABRATOR NORTH ANDOVER INCORPORATED	Solid Waste Combustors and Incinerators	42.726	-71.122	MA	865	245	3.53	ACAD
2014	NEI	8167211	WHEELABRATOR SAUGUS INC	Solid Waste Combustors and Incinerators	42.448	-70.980	MA	709	256	2.76	ACAD
2017	CAMD	7240911	Mystic	Fossil Fuel Electric Power Generation	42.392	-71.067	MA	706	266	2.66	ACAD
2014	NEI	7236411	SOLUTIA INC	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	42.157	-72.528	MA	984	376	2.62	ACAD
2014	NEI	6622811	MM TAUNTON ENERGY LLC	Other Electric Power Generation	41.923	-71.086	MA	674	305	2.21	ACAD
2014	NEI	7259211	ARDAGH GLASS INC	Glass Container Manufacturing	42.127	-71.514	MA	383	313	1.22	ACAD
2014	NEI	7887011	MEDICAL AREA TOTAL ENERGY PLANT	Fossil Fuel Electric Power Generation	42.337	-71.108	MA	325	273	1.19	ACAD
2017	CAMD	5736011	Bellingham	Fossil Fuel Electric Power Generation	42.093	-71.483	MA	261	314	0.83	ACAD