

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

Via Electronic Mail

January 19, 2018

Mr. David Foerter, Executive Director
Mid-Atlantic/Northeast Visibility Union/Ozone Transport Commission
444 North Capitol Street, NW – Suite 322
Washington, DC 20001
Email: dfoerter@otcair.org

Re: Florida Department of Environmental Protection's Comments on the Mid-Atlantic/Northeast Visibility Union (MANE-VU) "Ask" to States Concerning a Course of Action Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)

Dear Mr. Foerter:

As you are aware, on August 25, 2017, the Mid-Atlantic/Northeast Visibility Union (MANE-VU), requested that the Florida Department of Environmental Protection (Department) implement certain emission reduction measures under the federal Regional Haze Rule (40 CFR 51.308 (f)(2)(iii)) as MANE-VU's analysis found that Florida was a contributing state to visibility impairment at the Acadia National Park Class I Area. Specifically, the Ask requested that the Department consider a variety of "emission management" strategies that MANE-VU considers necessary to meet its Class I area reasonable progress goals in the Regional Haze Rule. Florida was one of 36 states in the Eastern half of the continental US that were analyzed for inclusion in the Ask by the MANE-VU Technical Support Committee.

While the Department recognizes its obligation to consult with other states to develop coordinated emission management strategies to make reasonable progress toward visibility goals in Class I areas outside of the State, we disagree with MANE-VU's conclusion that Florida is a contributing state. The Department appreciates the opportunity to provide the following comments that bring into question whether emissions from Florida can be "reasonably anticipated to contribute to visibility impairment" in any MANE-VU Class I area.¹

¹ See 40 C.F.R 51.308(f)(2)(ii)

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Application of Q/d Screening

Florida was selected for inclusion in the Ask based on a Q/d analysis where estimated 2015 statewide emissions of NO_x and SO₂ in tons (Q) were divided by the distance from the population centroid of Florida to each of the MANE-VU Class I areas in kilometers (d). MANE-VU chose a 2.0% contribution threshold to screen states in or out. Florida's contribution was below 2.0% for all areas except Acadia National Park which was calculated at 2.1% of the total impact. Given this very small exceedance of the 2.0% threshold, even small emissions reductions would bring the State below this threshold.

Statewide emissions of SO₂ from stationary sources, as determined through facility Annual Operating Reports, decreased approximately 24% from 2015 to 2016. NO_x emissions from both on-road mobile and stationary sources decreased approximately 9% over the same period. The Department expects to see similar annual decreases for the period 2017-2019 due to a variety of emissions reduction projects and unit retirements occurring at many of the State's largest emissions sources.

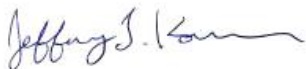
Furthermore, while Q/d is a common screening tool used across a variety of air quality applications, there are limits to its usefulness. In many cases, the correlation between Q/d and visibility impacts decrease with increasing distance.

Back Trajectory Analysis

MANE-VU utilized NOAA's HYSPLIT model to determine the source of emissions on the 20% most impaired days in each Class I area for 2002, 2011, and 2015. The results were used as a "qualitative opportunity to cross check the reasonability for including states." In other words, the trajectory analysis was used to determine the possibility that emissions from a state could be transported to a MANE-VU Class I area. In Acadia National Park, the only Class I area that Florida was tied to, 0.01% of all trajectories on the 20% most impaired days in 2015 passed over Florida. This is a very insignificant number and brings into question the likelihood of Florida emissions impacting a Class I area over 1,800 kilometers away. The lack of back trajectories over Florida also emphasizes the limits of the Q/d analysis, as described above.

In sum, the Department does not believe that the Q/d analysis is appropriate for Florida with regard to such distant areas. In addition, the 2.0% threshold is not justified. The Department does not believe emissions from Florida can be "reasonably anticipated to contribute to visibility impairment" in any MANE-VU Class I area. If you have any questions about these comments, please contact Hastings Read at (850) 717-9017 or by email at Hastings.Read@dep.state.fl.us.

Sincerely,



Jeffery F. Koerner, Director
Division of Air Resource Management

JFK/tl