



November 5, 2021

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Penobscot Indian Nation

Rhode Island

St. Regis Mohawk Tribe

Vermont

Jean Boling

Indiana Department of Environmental Management

Office of Air Quality, Room 1003

100 North Senate Avenue

Indianapolis, IN 46204

VIA EMAIL: jboling@idem.IN.gov

RE: Draft Indiana Regional Haze State Implementation Plan for the Second Implementation Period

Dear Ms. Boling:

The Mid-Atlantic/Northeast Visibility Union (MANE-VU) appreciates the opportunity to comment on the Indiana Department of Environmental Management's (IDEM's) draft Regional Haze State Implementation Plan (SIP) for the Second Implementation Period that was made available for review on September 28, 2021 (hereinafter, the "IDEM draft"). MANE-VU is the regional visibility planning organization of the air agencies in the Mid-Atlantic and Northeast. MANE-VU includes eleven states, two tribal nations, and the District of Columbia. It coordinates regional haze planning activities to help its members reduce visibility impairment at Class I areas in the MANE-VU region in furtherance of achieving the national visibility goals of EPA's Regional Haze Rule (RHR). To facilitate reasonable progress in visibility protection at its own Class I areas, and at all Class I areas throughout the U.S., MANE-VU is providing comments on the IDEM draft.

The IDEM draft is of interest to MANE-VU because MANE-VU identified Indiana emissions as significantly contributing to visibility impairment at Class I areas in the region. MANE-VU consulted with Indiana and other states identified as "contributing," and Indiana was included in the list of states receiving the MANE-VU Inter-RPO "Ask" for contributing states.¹ The Indiana response and resolution to this Ask must be described in its draft regional haze SIP for review and action by EPA and Federal Land Managers (FLMs) prior to approval. MANE-VU's comments below relate to meeting the MANE-VU

MANE-VU Class I Areas

Acadia National Park

Maine

Brigantine Wilderness

New Jersey

Great Gulf Wilderness

New Hampshire

Lye Brook Wilderness

Vermont

Moosehorn Wilderness

Maine

Presidential Range

Dry River Wilderness

New Hampshire

Roosevelt Campobello

International Park

Maine/New Brunswick,

Canada

¹ *Statement of the Mid-Atlantic/Northeast Visibility Union (MANE-VU) States Concerning a Course of Action in Contributing States Located Upwind of MANE-VU Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)*, August 25, 2017. Available at <https://otcair.org/MANEVU/Upload/Publication/Formal%20Actions/MANE-VU%20Inter-Regional%20Ask%20Final%208-25-2017.pdf>.

Inter-RPO Ask. Comments on specific sections of IDEM's draft are provided following the Inter-RPO Ask discussion.

MANE-VU Ask

MANE-VU's technical analysis identified visibility-impairing emissions from Indiana and other upwind states as reasonably anticipated to contribute to visibility impairment at MANE-VU Class I areas. Based on this analysis, MANE-VU developed a "MANE-VU Ask" that was sent to Indiana and the other identified states with five requests for consideration during the upwind states' second regional haze SIP planning effort. With this letter, MANE-VU is providing our overarching perspective on how well IDEM's draft addresses each of these requests. MANE-VU makes note of the past and future EGU retirements and emissions reductions described in Sections 8.1.1 and 8.3 of IDEM's draft. Nevertheless, MANE-VU respectfully requests that its Ask items be addressed in IDEM's regional haze SIP as described in the comments that follow.

Ask #1: EGUs \geq 25 MW with installed controls, ensure that controls are run year round.

IDEM's draft SIP does not address MANE-VU Ask #1. As described in Section 7.4 of the IDEM draft, IDEM has elected to defer analysis of its EGU sector until the third implementation period. While the workload distribution of source category analysis to different implementation periods is allowed under EPA guidance, IDEM's approach of deferring analysis of its EGU sector is inconsistent with MANE-VU's Inter-RPO Ask for the second implementation period. To this end, MANE-VU notes the Indiana EGU emissions reductions that occurred between 2009 and 2019 as described in Section 8 of IDEM's draft. Nevertheless, MANE-VU reiterates its request that IDEM pursue enforceable mechanisms to ensure that EGUs \geq 25 MW with installed controls run those controls year round.

Ask #2: For emissions sources having a 3.0 Mm^{-1} impact or greater at MANE-VU Class I areas, perform a four-factor analysis.

The IDEM draft does not address MANE-VU Ask #2. The Indiana Michigan Power Company (dba American Electric Power) Rockport Plant (Facility ID 6166) was identified by MANE-VU technical analysis as a facility with the potential for 3.0 Mm^{-1} impact or greater at one or more of MANE-VU's Class I areas. MANE-VU notes the emissions controls and reductions for the Rockport Plant discussed in Section 8.5 of the IDEM draft, including the continuous operation of SCRs and enhanced DSI systems. Nevertheless, MANE-VU respectfully requests that a four-factor analysis be performed for the Rockport Plant, consistent with MANE-VU's Ask #2, to determine the reasonableness of more stringent control efficiencies or stricter emissions limits.

Ask #3: Adopt an ultra-low sulfur fuel oil standard.

The IDEM draft does not address the MANE-VU ultra-low sulfur fuel oil Ask. MANE-VU respectfully re-iterates its request that Indiana adopt ultra-low sulfur fuel oil standards as part of its long-term strategy, or demonstrate in its SIP why it would not be feasible to do so. For distillate oil, this would be essentially the equivalent of on-road diesel, which is already widely

available. We note that all MANE-VU states have successfully adopted low sulfur fuel oil requirements.

Ask #4: For EGUs and other large sources, pursue enforceable mechanisms to lock in lower emission rates.

MANE-VU notes the EGU emissions reductions described in Section 8 of the IDEM draft, including those that have come about via enforceable mechanisms, such as consent orders. However, IDEM does not directly address MANE-VU's Ask #4 in its draft SIP.

Ask #5: Encourage and promote energy efficiency and clean technologies.

The IDEM draft does not address Ask #5. MANE-VU respectfully asks that IDEM consider, and report in its SIP, measures or programs in Indiana that reduce emissions by encouraging energy efficiency and promoting cleaner energy technologies. Rather than a focus on energy markets, this would be a discussion within IDEM's haze SIP of the energy efficiency measures and clean energy programs under consideration or currently operating in Indiana. Unlike MANE-VU's other Ask items, MANE-VU does not necessarily intend that these measures be enforceable or included as part of a state's long-term strategy. But because such programs can reduce emissions and therefore benefit visibility, MANE-VU is asking its upwind state partners to consider and report such measures in their haze SIPs.

Section-Specific Comments

7.3 Q/d Screening Analysis for Source Selection

MANE-VU respectfully asks IDEM to describe in its SIP the technical basis for selecting 5 as the Q/d screening threshold for screening sources.

23.1 Class I Area Selection

At the bottom of page 199, below Table 23-2, the text states, "Results for all Class I areas analyzed show 2014-2018 baseline monitored values, as determined through the IMPROVE monitoring data, are lower than the modeled visibility impacts at each Class I area for 2028, based on the 2011 emissions[.]" Although this statement is true for some of the Class I areas shown in Table 23-2, it does not appear to be true for many others.

23.11 Brigantine Natural Wilderness Area, NJ; and Lye Brook National Wilderness Area, VT (MANE-VU)

This section asserts that "on-the-books" measures, along with federal measures, are such that the meeting of reasonable progress goals (RPGs) will not be impeded. This section concludes that, as a result, no further analysis for this SIP will be taken. MANE-VU does not challenge the assertion that the meeting of RPGs will not be impeded, but re-iterates the fact that RPGs themselves are not enforceable and that the overarching goal of CAA 169A and the regional haze rule is to make progress towards the goal of natural visibility conditions by 2064. As emissions sources such as EGUs become better controlled, smaller additional emissions reductions from these sources, or emissions reductions from other source types, become necessary to make incremental improvements in visibility and to ensure that downward trends in monitored

visibility metrics continue. Therefore, MANE-VU further re-iterates its request that IDEM do additional work and analysis to ensure that MANE-VU's Inter-RPO Ask is addressed in its SIP such that incremental progress is made at MANE-VU Class I areas affected by Indiana emissions.

25.0 20% CLEAREST DAYS ANALYSIS

The first sentence in this section states, "Results for all Class I areas analyzed show 2014-2018 baseline monitored values, as determined through the IMPROVE monitoring data, are lower than the modeled visibility impacts at each Class I area for 2028, based on the 2011 emissions[.]" Although this statement is true for almost all of the Class I areas shown in Table 25-1, it does not appear to be true for Isle Royale, Brigantine, and Lye Brook.

Thank you for your efforts and your consideration of these comments. If you would like further clarification or discussion on any of these comments, please contact the MANE-VU Lead Manager Paul Miller (pmiller@nescalum.org) or the Chairs of the MANE-VU Technical Support Committee: Sharon Davis of the New Jersey Department of Environmental Protection (sharon.davis@dep.nj.gov) and David Healy of the New Hampshire Department of Environmental Services (david.s.healy@des.nh.gov).

Sincerely,

Sharon Davis, New Jersey Department of Environmental Protection

David Healy, New Hampshire Department of Environmental Services

Co-Chairs, MANE-VU Technical Support Committee

cc: MANE-VU Directors