

September 28, 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

Mark Leath
Air Quality Planning Section
Missouri Department of Natural Resources

Via email to mark.leath@dnr.mo.gov

Dear Mr. Leath:

This letter is in response to the July 30, 2021 letter sent to the Mid-Atlantic/Northeast Visibility Union (MANE-VU) and signed by Emily Wilbur, Chief of the Missouri Department of Natural Resources (DNR) Air Quality Planning Section, asking for discussion points and comments on Missouri's pre-proposal draft Regional Haze SIP revision. MANE-VU appreciates Missouri DNR's proactive request for comments ahead of a formal comment period. Such consultation between states helps ensure that visibility goals will be met at mandatory federal Class I areas throughout the country.

MANE-VU recognizes the important steps that Missouri has made to reduce emissions of visibility-impairing pollutants, and as noted below, many of these are consistent with the measures MANE-VU has asked Missouri and other states to consider in their haze SIPs. Missouri's pre-proposal draft could be further strengthened in specific regard to incorporating additional measures that will ensure expected future emission reductions are permanent and enforceable. To this end, MANE-VU provides the following general comment along with two additional specific points according to the applicable sections in Missouri DNR's pre-proposal draft.

1) General comment, MANE-VU Ask

MANE-VU's technical analysis identified haze-impairing emissions from Missouri and other upwind states as reasonably anticipated to contribute to visibility impairment at multiple MANE-VU Class I areas. Based on this analysis, MANE-VU developed a "MANE-VU Ask" that was sent to Missouri and the other identified states with five requests for consideration during the upwind states' second haze SIP planning effort.¹ MANE-VU is now providing

¹ The MANE-VU "Ask" to upwind states for the second haze SIP implementation period can be found at <https://otcair.org/MANEVU/Upload/Publication/Formal%20Actions/MANE-VU%20Inter-Regional%20Ask%20Final%2008-25-2017.pdf>.

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

below our overarching perspective on how well Missouri's pre-proposal draft addresses each of these areas.

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

As described in Missouri's pre-proposal draft, many of Missouri's regulated sources have entered into enforceable consent agreements to run their controls at all times (except startup, etc.) when burning coal. This appears largely responsive to the MANE-VU Ask for this item, and we recognize this constructive step. Nevertheless, Missouri should ensure that all identified sources have enforceable agreements or regulations.

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.

As shown in the table on page 4 of the MANE-VU upwind state Ask, and as mentioned in Appendix G of Missouri's pre-proposal draft, there are no individual Missouri sources that contribute 3.0 Mm^{-1} or more to MANE-VU's Class I areas. Therefore, Ask #2 is not applicable to Missouri.

Ask #3: Ultra-low sulfur fuel oil standard

Missouri did not address the MANE-VU ultra-low sulfur fuel oil Ask. MANE-VU respectfully asks Missouri to adopt ultra-low sulfur fuel oil standards consistent with the MANE-VU Ask 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. It should be noted that all MANE-VU states have adopted ultra-low sulfur fuel oil standards.

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

As described in Missouri's pre-proposal draft, many of Missouri's regulated sources that burn coal have entered into enforceable consent agreements to burn low sulfur coal. MANE-VU acknowledges and commends these actions. A regulation should be adopted that requires all identified sources that burn coal to use low sulfur coal.

Ask #5: Energy efficiency and clean technologies

Although Missouri does mention solar and other clean technologies in Section 4.2.5.1 of its pre-proposal draft, these technologies are discussed in the context of how they affect the energy market. For a fuller perspective, MANE-VU respectfully asks that Missouri consider, and report in its SIP, measures or programs in Missouri 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 Missouri's haze SIP of the energy efficiency measures and clean energy programs under consideration in Missouri. 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.

2) Section 4.1.2.5 Initial Discussions with Missouri Sources Meeting the 1 Percent Screening Threshold

Missouri removed the Ameren Missouri - Meramec Energy Center from its list of sources for 4-factor consideration because (a) a voluntary switch from coal to natural gas has reduced emissions and (b) this facility is expected to retire in 2022 according to Ameren Missouri's latest Integrated Resources Plan. Before removing the Ameren Missouri - Meramec Energy Center from consideration for 4-factor analysis, Missouri should document in its SIP that the fuel switch is permanent and enforceable and also document in its SIP that the shutdown will be made permanent and enforceable via cancellation of the facility's air permit.

3) Section 4.2.5 Source retirement and replacement schedules and Table 42

Missouri should explicitly document in its SIP that the retirements and associated emissions reductions described in Section 4.2.5 and shown in Table 42 are permanent and enforceable.

Again, MANE-VU appreciates this opportunity to proactively consult with Missouri on its pre-proposal draft. Several areas of the pre-proposal draft are consistent with elements of the MANE-VU Ask, while we would like to see additional effort in other areas. 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