



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

FEB 23 2018

Mr. Dave Foerter
Director
Mid-Atlantic/Northeast Visibility Union
444 North Capitol Street, NW- Suite 322
Washington, DC 20001

Re: August 25, 2017, "Asks" for Emission Reduction Measures Related to Regional Haze

Dear Mr. Foerter:

The purpose of this letter is to respond to Mid-Atlantic/Northeast Visibility Union's (MANE-VU) August 25, 2017, document which outlined emission reduction measures identified by MANE-VU Class I states as being necessary to make reasonable progress in MANE-VU Class I areas. MANE-VU references these emission reduction measures as "Asks". The Missouri Department of Natural Resources' Air Pollution Control Program appreciates the opportunity to review the Asks.

MANE-VU has identified Missouri, along with other states, as contributing to visibility impairment at MANE-VU Class I areas located in Maine, New Jersey, New Hampshire and Vermont based on analyses using 2011 and 2015 emissions data. MANE-VU is asking contributing states to consider five specific "emissions management" strategies in state's SIPs for the second planning period and to address the inclusion or exclusion of these measures in final control strategies. Since Missouri does not have a source with "the potential for 3.0 Mm-1 or greater visibility impacts at any MANE-VU Class I area", only four of the five Asks would apply to Missouri sources. These Asks specifically outline requirements that MANE-VU views as reasonable and cost-effective NO_x and SO₂ control measure for a future Missouri control strategy.

As you are aware, the EPA has extended the deadline to submit State Implementation Plans (SIPs) for the second planning period to July 2021. Missouri intends to submit our Regional Haze SIP by the extended, regulatory deadline in 2021. As such, Missouri is currently in the early stages of conducting our own technical analysis to address visibility in the two Class I areas located within the state. At this time, we are unable to agree or disagree on MANE-VU's technical analysis that suggests Missouri's location, historical emissions and prevailing weather patterns creates the possibility for visibility impact on MANE-VU's Class I areas. Therefore, Missouri requests that MANE-VU or MANE-VU states refrain from incorporating any of the emission reduction measures, or Asks, in future control strategy scenarios.



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Missouri has already seen reductions in visibility impairment at our Class I areas due to regulatory programs that have impacted and will continue to impact Missouri sources over the next several years. Visibility improvement in our Class I areas is on an accelerated pace such that the rate of progress towards the national visibility goal exceeds the uniform rate necessary to remedy visibility impairment by 2064. Based on this, Missouri believes that the Asks may be premature and should not be relied upon in any state's Regional Haze SIP for the second planning period.

Missouri understands that the Mid-Atlantic and Northeast states will develop and submit SIPs for their own states using the MANE-VU analysis. Missouri will endeavor to work with individual states to ensure that future control strategies are consistent with Missouri strategies. Missouri looks forward to coordinating with MANE-VU states on these regional haze issues.

The Department appreciates MANE-VU's outreach efforts through consultation meetings to share information with and obtain feedback from states such as Missouri. Should MANE-VU require further information on this matter, please contact Darcy Bybee, Director of the Department's Air Pollution Control Program at 1659 East Elm Street, Jefferson City, MO 65101, via email at Darcy.Bybee@dnr.mo.gov, or by telephone at (573) 751-4817.

Thank you for your interest in air quality.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Darcy A. Bybee
Director

DAB:cb