



January 27, 2018

David Foerter
Ozone Transport Commission
444 N Capitol St NW Ste 322
Washington DC 20001-1529

RE: MANE-VU Regional Haze Consultation

Dear Mr. Foerter:

This correspondence is being sent to you on behalf of the state air pollution control agencies in Alabama, Florida, Kentucky, North Carolina, Tennessee, Virginia, and West Virginia (the seven VISTAS states). Comments are offered herein in response to the following documents:

- *Selection of States for MANE-VU Regional Haze Consultation (2018) – 9/5/2017*
- *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)*

As you know, the MANE-VU states have made available the documents above and have held four consultation calls with the seven VISTAS states and other states. Thank you for sharing your thoughts during these calls and especially for taking time to explain the technical assessment in detail.

At this time, it is not possible for the seven VISTAS states to provide a detailed technical response to the MANE-VU requests. However, this letter provides some initial thoughts and concerns for your consideration.

Timing.

The MANE-VU states have indicated their intent to file their regional haze SIPs by the original July 2018 deadline that EPA has more recently adjusted to July 31, 2021. The ten VISTAS states are working toward completion of their regional haze technical analysis in mid-2019 with the intention of submitting regional haze SIPs by July 2021. The differing schedules have resulted in the seven VISTAS states being asked to assess the MANE-VU analysis without the benefit of the forthcoming VISTAS technical work.

On January 18, 2018, EPA announced its decision to revisit aspects of the 2017 Regional Haze Rule Revisions.¹ While the extent of the new review is uncertain, the potential exists that EPA could modify certain existing regional haze provisions prior to the SIP submittal deadline; hence possibly affecting state obligations under the rule.

The MANE-VU states should allow time for EPA to complete its revisit to the rule and for the VISTAS analysis to be completed and shared before submitting SIPs incorporating any new emission control presumptions directed at the VISTAS states.

Technical Analysis – Inventories, Modeling, and Evaluation.

The MANE-VU states' analysis used emission inventories that are inconsistent with the recent EPA regional haze modeling platform. These inventories do not fully reflect emission reductions expected from southeastern EGUs by 2028 and perhaps from other sources as well. Modeling results derived from use of the outdated emissions inventory may not allow conclusive determinations of impacts, if any, from VISTAS states on Class I areas in the MANE-VU region. Additionally, the analyses may not meet EPA's SIP approval criteria.

In many cases, the sources of the alleged contributions to downwind receptors are located thousands of miles away from the MANE-VU Class I areas. The MANE-VU states used the CALPUFF model and the Q/d screening approach to identify contributions that they allege are significant. CALPUFF should not be used for transport distances greater than 300 km since there are serious conceptual concerns with the use of puff dispersion models for very long-range transport which can result in overestimations of surface concentrations by a factor of three to four.²

The preamble to the recent Revisions to the Guideline on Air Quality Models that modified appendix W of 40 CFR part 51 states, in part, "the EPA has fully documented the past and current concerns related to the regulatory use of the CALPUFF modeling system and believes that these concerns, including the well documented scientific and technical issues with the modeling system, support the EPA's decision to remove it as a preferred model in appendix A of the *Guideline*."³

¹ <https://www.epa.gov/visibility/epas-decision-revisit-aspects-2017-regional-haze-rule-revisions>

² *Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary Report and Recommendations for Modeling Long Range Transport Impacts* (December 1998)

³ *Federal Register*, Vol. 82, No. 10, Tuesday, January 17, 2017, Page 5195

The reliability of the Q/d screening approach diminishes over distance and especially beyond 300 km. If the MANE-VU states wish to evaluate emission impacts more than 300 km downwind from sources, a scientifically reliable approach is essential such as the CAMx model with the PSAT source apportionment method.

In response to our stated concerns about inaccuracies in the MANE-VU analysis during the December 18, 2018 technical call, the MANE-VU states suggested that the seven VISTAS states could reassess contributions using their own information to correct the MANE-VU analysis. The VISTAS states intend to conduct a thorough technical review of emission impacts during their forthcoming analysis. However, it is incumbent on the MANE-VU states to correct the errors inherent in their own analysis and reassess the states with which consultation is necessary.

The MANE-VU “ask” includes year-round use of effective control technologies on EGUs; a four-factor analysis on sources with potential for visibility impacts of 3.0 Mm^{-1} or greater at any MANE-VU Class I area; establishment of an ultra-low sulfur fuel oil standard; updated permits, enforceable agreements, and/or rules to lock in lower emission rates for EGUs and other large emission sources that have recently reduced emissions or are scheduled to do so; and efforts to decrease energy demand through use of energy efficiency and increased use of combined heat and power and other clean distributed generation technologies. This “ask” fails to recognize fully the improved controls, fuel switches, retirements, and energy demand reductions that have already been achieved in the Southeast. Further, the MANE-VU states suggest that the Southeast adopt control measures that would produce little if any visibility improvement at MANE-VU Class I areas. The MANE-VU states should refine their analyses and establish a sound basis for any actions requested of the seven VISTAS states and incorporated such expectations in MANE-VU SIPs.

Permanent and Enforceable.

Regional haze SIPs (including the reasonable progress goals that are set for each Class I area) should only include emission reductions that are permanent, quantifiable, and enforceable. Therefore, the MANE-VU states should only include in their regional haze SIPs emission control presumptions for the seven VISTAS states that are clearly necessary and effective and have been made permanent and enforceable via state rulemaking or permit revisions. To include emission controls that are not permanent and enforceable in MANE-VU states’ SIPs would be inconsistent with the Clean Air Act and the Regional Haze Rule and could result in adverse comments from the seven VISTAS states during the MANE-VU regional haze SIP public comment period.

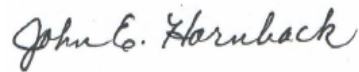
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The VISTAS states will be initiating technical work in the spring of 2018. When that work is completed, we will provide the MANE-VU states with a summary of our analysis. Early results may be available as early as late 2018 and certainly by the spring of 2019.

Please note that this letter is not intended to cover every issue that may be of concern to the seven VISTAS states. Any or all states represented by this letter may submit state-specific comments to you.

Thank you for your consideration of these concerns. We welcome further conversations at appropriate times as our collective work progresses.

Sincerely,

A handwritten signature in cursive script that reads "John E. Hornback".

John E. Hornback
Executive Director
Metro 4/SESARM/VISTAS

Copies: VISTAS States Air Pollution Control
Agency Directors