

May 3, 2022

Mark Leath
Air Quality Planning Section
Missouri Department of Natural Resources

Via email to apcpsip@dnr.mo.gov

RE: Missouri Regional Haze Plan for the Second Planning Period, April 28, 2022

Dear Mr. Leath:

The Mid-Atlantic/Northeast Visibility Union (MANE-VU) is pleased to provide comments on the April 28, 2022 Public Hearing draft of Missouri Department of Natural Resources' (DNR's) *Missouri Regional Haze Plan for the Second Planning Period* (hereinafter, DNR's proposal). The comments shown in italics below are excerpted from MANE-VU's September 28, 2021 letter to DNR providing comment on DNR's pre-proposal draft. Below each comment, MANE-VU provides its overarching perspective on how well DNR's proposal addresses MANE-VU's comment from its September letter.

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

Ask #1: Electric Generating Units (EGUs) \geq 250 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.

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

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

MANE-VU acknowledges and appreciates DNR's response to this comment. In the 4-factor discussions for each affected facility in Section 4.1.3.3, the proposal (and the pre-proposal) cites Missouri regulation 10 CSR 10.6.050, which requires control devices to be run at all times when coal is burned.

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.

MANE-VU recognizes that this Ask 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.

MANE-VU acknowledges the discussion at the bottom of page 20/top of page 21 of DNR's proposal (and in DNR's March 15, 2022 response letter to our pre-proposal comments) that all of DNR's permitted sources use ultra-low sulfur fuel and that the sources DNR spoke with said their vendors only offer ultra-low sulfur fuel. It should be noted that this Ask is also geared towards the residential and commercial/institutional sectors. However, according to publicly available data from the 2017 National Emissions Inventory, residential and commercial/institutional oil burning accounts for only about 0.004% of MO's total sulfur dioxide emissions.

Notwithstanding the above, MANE-VU still respectfully requests that Missouri (and all other upwind states that are reasonably anticipated to contribute to regional haze at MANE-VU Class I areas) adopt a low-sulfur fuel standard so that the use of ultra-low sulfur fuel is maintained in the event market forces influence a shift back to fuels with higher sulfur content.

Ask #4: For 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.

MANE-VU acknowledges and appreciates the enforceable consent agreements described in the pre-proposal and proposal that support this Ask.

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 consider and report such measures in their haze SIPs.

MANE-VU acknowledges and appreciates the discussion of MO-specific renewable energy efforts that DNR added to page 114 of the proposal.

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 document in its SIP that the shutdown will be made permanent and enforceable via cancellation of the facility's air permit.

MANE-VU acknowledges and appreciates that DNR added the following wording related to the fuel switch to the proposal, which was not present in the pre-proposal: "This voluntary switch is enforced by their operating permit." This enforceability was also clarified in DNR's March 15, 2022 response letter. Please see our comment below regarding the enforceability of Meramec's expected retirement.

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.

MANE-VU acknowledges and appreciates that DNR added the word "enforceable" to the proposal when describing the facilities that have already shut down. However, DNR describes that the planned retirements for Meramec, Lake Road, Sioux, and Empire are not yet enforceable and that an enforceable commitment is not necessary at this time because Sioux and Empire were

included in EPA's 2028 modeling, upon which DNR relied. MANE-VU respectfully asks that the retirements for Meramec, Lake Road, Sioux, and Empire be made permanent and enforceable as soon as is practicable.

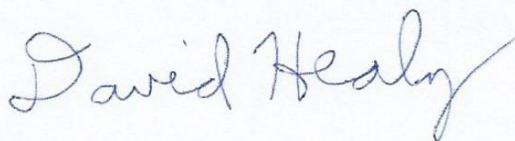
MANE-VU appreciates the collaboration and consultation that it has had with DNR during all phases of the regional haze SIP process for the second planning period. If you would like further clarification or discussion on any part of this letter, please contact the MANE-VU Lead Manager Paul Miller (pmiller@nescaum.org) 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) or 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

A handwritten signature in black ink that reads "Sharon Davis". The signature is written in a cursive style with a large initial "S".

David Healy, New Hampshire Department of Environmental Services

A handwritten signature in black ink that reads "David Healy". The signature is written in a cursive style with a large initial "D".

Co-Chairs, MANE-VU Technical Support Committee