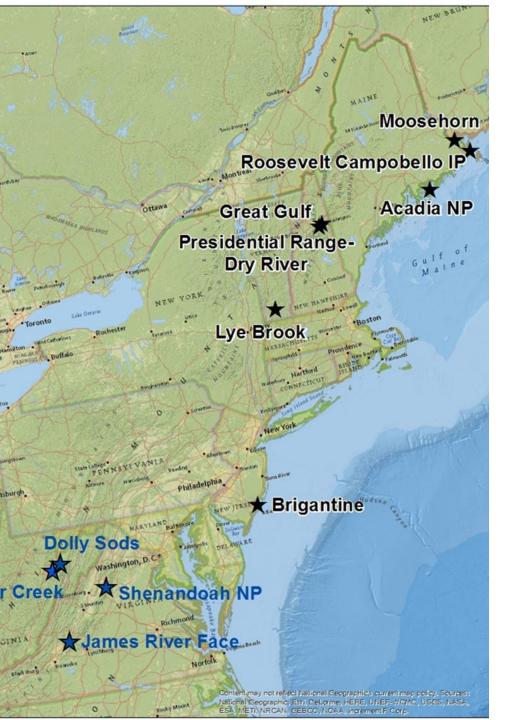
**Draft Deliberative Confidential** 

OTC/MANEVU FALL STAKEHOLDER ONLINE MEETING OCTOBER 2, 2024

## MANEVU Technical Support Committee

Co-Chairs Sharon Davis, NJDEP and David Healy, NHDES



- TSC Workplan & Progress
- RH Trend Analysis
- 2025 Workplan

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- RH Trend Analysis
- 2025 Workplan

## TSC Workplan: 1Q2024 – 1Q2025

| 1Q 2025<br>4Q 2024<br>3Q 2024<br>2Q 2024<br>1Q 2024 |
|---|
|---|

| Deliverable                  | Activity  | Sub-Activity   | Notes  | Comments   |   |       |           |   |  |
|------------------------------|---|--|--|--|---|-------|-----------|---|--|
| TSC General                  | Update Air Directors                                | ADs/Committees/Stakeholders                                  | Monthly Calls and Yearly<br>Meetings               |  | · | • • • |           | · |  |
| RH Metrics                   | Complete Annual RH Metrics<br>Plots                 | Workgroup produces 2022 metrics/plots                        | 2022 plots in 2024; 2023 plots<br>in 2025, etc.    | See Visibility Workgroup<br>Timeline for specific tasks<br>and timeframes. | · |       |           |   |  |
|                              |   | Present to ADs/Committees/Stakeholders                       |  |  |   | •     |           | - |  |
|                              | Draft 2022 Metrics report                           | Final Workgroup review of 2022 metrics report                |  |  |   |       |           |   |  |
|                              |   | Final TSC review of 2022 metrics report                      |  |  |   |       |           | • |  |
|                              | Complete technical analyses for<br>progress report  | Assess status Long-term strategies                           |  |  | İ |       | ·         | • |  |
|                              |   | Assess status of control measures in<br>other states         |  |  | • |       | •         |   |  |
|                              |   | Assess Emissions trends in MANEVU and<br>Contributing States |  |  |   |       |           |   |  |
|                              |   | States begin 60 day FLM Review<br>Final Submittal to USEPA   |  | Due 1/31/2025  |   | -     |           | • |  |
| TSC General                  | Update Air Directors                                | ADs/Committees/Stakeholders                                  | Calls and Meetings                                 |  | · | • •   | T         | · |  |
| 3rd RH SIP<br>Planning Phase | RPO Coordination                                    | Inventory for 3rd RH Planning                                | Quarterly Calls                                    | As needed.   |   |       |           | Τ |  |
| -                            | Request OTC Modeling perform<br>2038 Projection Run |  | Will need 2038 projected<br>inventory              | 2038 tentatively   |   |       |           |   |  |
|                              | MANEVU Asks developed for RP                        | TBD  | Will need Controlled 2038<br>projected inventory   | available  |   |       | T         | T |  |
|                              | 120 RH consultation period starts                   |  |  | December 2024  |   |       | $\dagger$ | + |  |
|                              | 3rd RH SIP due to EPA                               |  | 40 CFR Part 51.308(f): Due<br>date is July 1, 2028 |  |   |       |           | + |  |





### Mid-Atlantic/Northeast U.S. Visibility Data (2<sup>nd</sup> RH SIP Metrics)

Prepared by Mid-Atlantic/Northeast Visibility Union (MANEVU) Technical Support Committee Visibility Data Workgroup

October 17, 2023







#### MANEVU Technical Support Committee

Emissions Trends Report to Support MANEVU States Progress Reports for the Second Regional Haze Planning Period

August 13, 2024

### Potential Revisions to RH Rule

- EPA asked for comment via informal docket
- TSC developed comments
- Letter submitted in July 2024

# General Areas of Comments from RPOs:

- SIP submittal deadline
- 4-Factor Analyses
- Reasonable Progress Goals
- Long Term Strategies
- SIP Submittals

Mid-Atlantic/Northeast Visibility Union



Maine

Naryland

Massachusetts

New Hampshire

New Jersey

New York

Rhode Island

Vernont

St. Regis Mohawk Tithe

#### Reducing Regional Haze for Improved Visibility and Health

89 South Street, Suite 602 Boston, MA 02111 617-259-2005 otcair.org/manevu

#### June 25, 2024

Mr. Scott Mathias, Air Quality Policy Division Office of Air Quality Planning And Standards U.S. Environmental Protection Agency Research Triangle Park, NC 27711

#### Attention: Docket ID No. EPA-HQ-OAR-2023-0262

RE: Protection of Visibility: Amendments to Requirements for State Plans Rule

#### Dear Mr. Mathias:

We are writing on behalf of the membership of the Mid-Atlantic/Northeast Visibility Union (MANEVU) Technical Support Committee (TSC), which includes 12 states in the Northeast and Mid-Atlantic regions and the Penobscot Indian Nation and the St. Regis Mohawk Tribe. The TSC membership also includes regional EPA offices, OAQPS, and Federal Land Managers including the National Park Service, Forest Service, and Fish and Wildlife.

MANE/VU Class I Areas Acadia National Park Maine Brigantine Wilderness New Jersey Great Galf Wilderness New Hampshire Law Brook Wilderness Vernort feasehorn Wilderness Malar **Presidential Range** Dry River Wilderness New Hampshire Roosevelt Campobello International Park

Maine/New Brunnwick,

Canada

In Spring 2023, the White House Office of Management and Budget's Office of Information and Regulatory Affairs issued its Unified Agenda of Regulatory and Deregulatory Actions. Included in the Unified Agenda is Project RIN 2060-AU01, Protection of Visibility: Amendments to Requirements for State Plans.<sup>1</sup> This rulemaking, originally scheduled for proposal in February 2024, was to "focus on the regional haze third planning period" and "address implementation challenges and stakeholders' feedback received on the 2017 rulemaking and subsequent guidance."

The MANEVU TSC was made aware of requests for comments on the potential Regional Haze Rule revisions in January 2023 during our regular EPA/FLM coordination efforts. At our committee call on May 23, 2023, Brian Timin (OAQPS) presented information on the future RHR revisions where he made a request for comments. In June 2023, we issued our first set of comments, including the TSC's ideas for streamlining and improving the RHR. This set of comments was sent by email to Brian Timin (OAQPS) and Emily Millar (OAQPS).

This letter is a version of our 2023 email revised to reflect the EPA's proposed list of topics from the "Information Webinar on Regional Haze Rule Revisions"

<sup>&</sup>lt;sup>1</sup> https://www.reginfo.gov/public/do/cAgendaViewRule?publd=202304&RIN=2060-AU01

### MANEVU Regional Haze SIP Progress As of September 17, 2024

Oct. 10, 2023

|    | IMPROVE Data Analysis | Inventory Development<br>& Analysis | Modeling | Consultation with<br>contributing states | State 4-factor analyses<br>completed | Response to MANE-VU<br>Ask Developed | Long-term strategy<br>developed | Initial draft of SIP<br>developed | State rules drafted<br>(as appropriate) | FLM/EPA consultation | Draft SIP Submittal<br>60-day Clock Started | Public<br>Hearing/Comment | Final SIP Submittal | At EPA | SIP Approved | SIP Approved |    |
|----|-----------------------|-------------------------------------|----------|--|--------------------------------------|--------------------------------------|---------------------------------|-----------------------------------|---|----------------------|---|---------------------------|---------------------|--------|--------------|--------------|----|
| СТ |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | CT |
| DC |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | DC |
| DE |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | DE |
| MA |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | MA |
| MD |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | MD |
| ME |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | ME |
| NH |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | NH |
| NJ |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | NJ |
| NY |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | NY |
| PA |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | PA |
| RI |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | RI |
| VT |                       |                                     |          |  |                                      |                                      |                                 |                                   |   |                      |   |                           |                     |        |              |              | VT |

Task Complete/Full EPA SIP Approval

Proposed EPA SIP Approval

In Progress

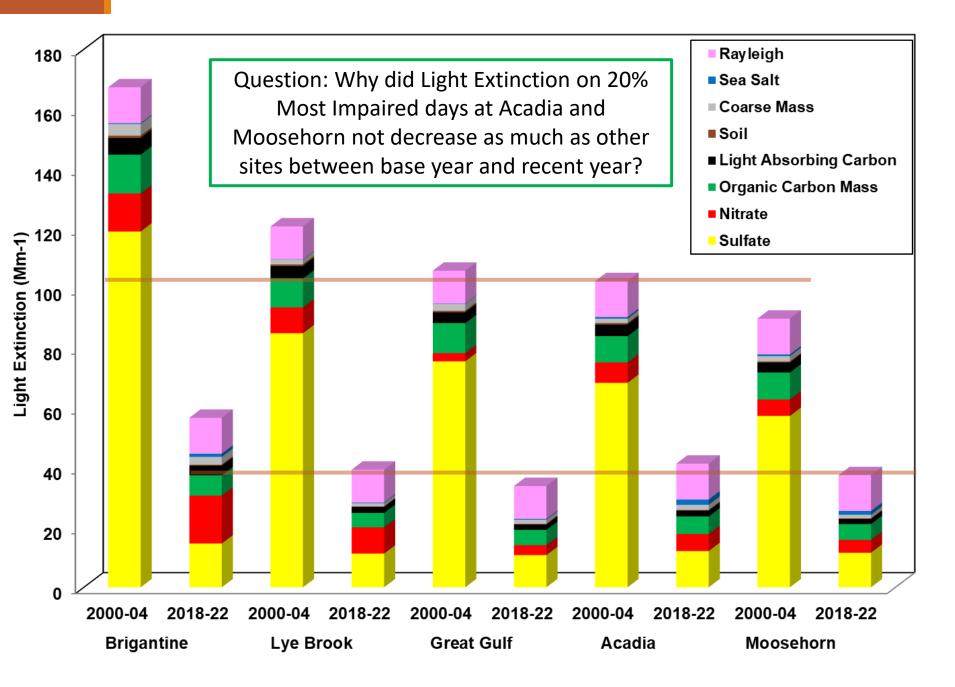
EPA Action Pending

7

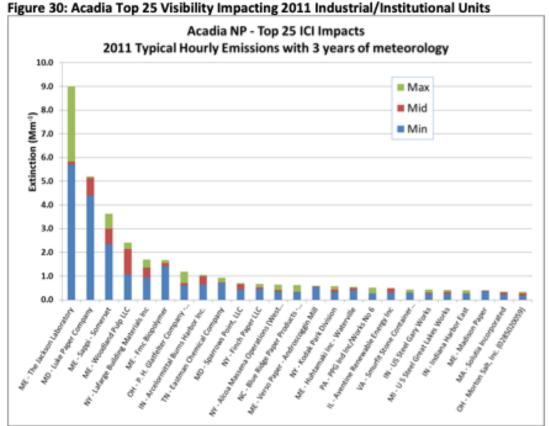
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20% Most Impaired Day Analysis:

Base Year (2000-2004) vs. Current (2018 -2022)



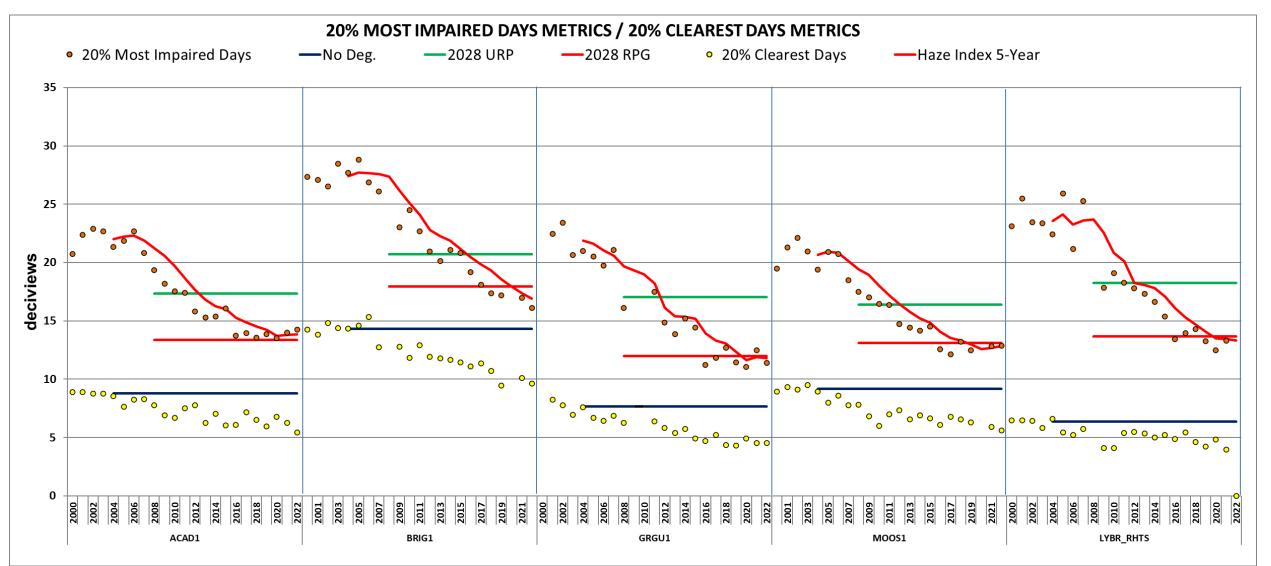
### Acadia National Park – Examples of 2<sup>nd</sup> RH Planning Phase Information



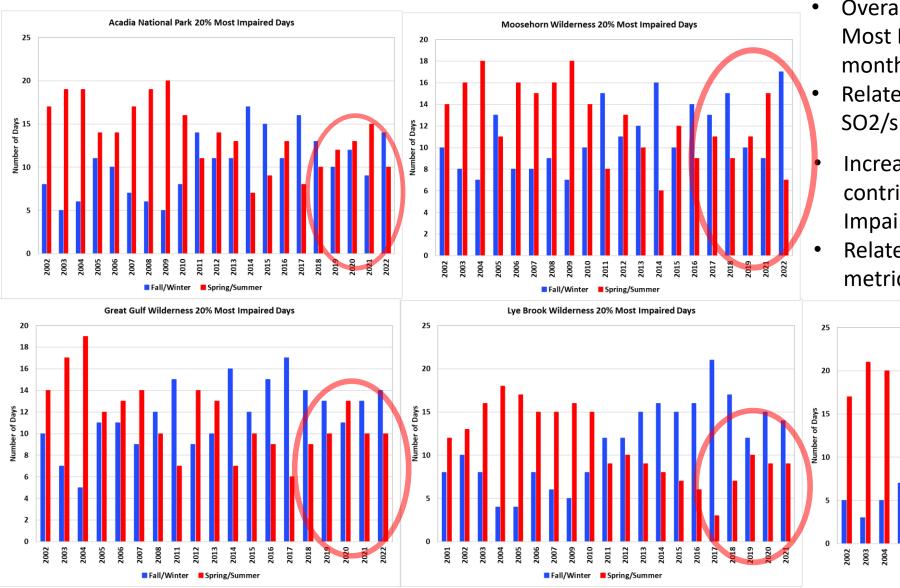
#### Table 35: Top Impacting ICI Facilities (2011 Emissions) to MANE-VU Class I Areas

|      |       | Facility Info                          |                      |   | Overall Max<br>Extinction (Mm <sup>-1</sup> |                  |                 |  |
|------|-------|--|----------------------|---|---|------------------|-----------------|--|
| Rank | State | Facility Name                          | Facility/<br>ORIS ID | Unit IDs  | MANE-VU<br>Score                            | MANE-VU<br>Areas | Nearby<br>Areas |  |
| 1    | MD    | Luke Paper Company                     | 7763811              | 001-0011-3-0018,<br>001-0011-3-0019,<br>001-0011-6-0235 | 20  | 12.47            | 90.79           |  |
| 2    | NY    | Lafarge Building Materials Inc.        | 8105211              | 43101   | 13  | 8.14             | 0.93            |  |
| 3    | ME    | Sappi - Somerset                       | 8200111              | 0,1,37  | 12  | 3.82             | 0.23            |  |
| 4    | OH    | P. H. Glatfelter Company - Chillicothe | 8131111              | 147671  | 10  | 1.48             | 3.74            |  |
| 5    | ME    | Woodland Pulp LLC                      | 5974211              | 0   | 9   | 7.47             | 0.07            |  |
| 6    | IN    | Arcelormittal Burns Harbor Inc.        | 7376511              | 0   | 6   | 1.51             | 2.02            |  |
| 7    | NY    | Finch Paper LLC                        | 8325211              | 0,12  | 6   | 7.64             | 0.24            |  |
| 8    | TN    | Eastman Chemical Company               | 3982311              | B2531,B3251,B831  | 4   | 2.18             | 4.33            |  |
| 9    | ME    | Fmc Biopolymer 569                     |                      | 0   | 3   | 1.68             | 0.04            |  |
| 10   | ME    | The Jackson Laboratory                 | 7945211              | 18  | 3   | 9.00             | 0.01            |  |

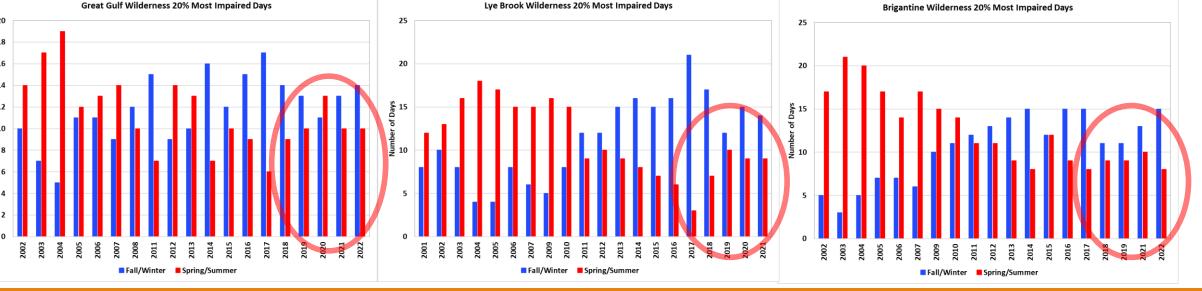
#### Leveling off in improvements of 20% Most Impaired Days (except Brigantine)



#### Seasonal Comparison Across MANEVU Class I Sites



- Overall switch from more 20% Most Impaired during warm months to cool months Related to decrease in
- SO2/sulfates, but:
- Increase in summertime contributions to 20% Most Impaired Days in 2018-2022
- Related to leveling off of haze metrics in recent years?



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## TSC Workplan: 1Q2025 – 4Q2025

| 4Q 2025<br>3Q 2025<br>2Q 2025<br>1Q 2025 |
|--|
|--|

|                              |   |  | Notes  | -  |     |   |   |   |
|------------------------------|---|--|--|--|-----|---|---|---|
| Deliverable                  | Activity  | Sub-Activity   | Comments   |  |     |   |   |   |
|                              |   |  |  |  |     | _ | _ |   |
| TSC General                  | Update Air Directors                                | ADs/Committees/Stakeholders                                  | Monthly Calls and Yearly<br>Meetings               |  |     | • |   |   |
| RH Metrics                   | Complete Annual RH Metrics<br>Plots                 | Workgroup produces 2023 metrics/plots                        |  | See Visibility Workgroup<br>Timeline for specific tasks<br>and timeframes. | •   |   |   |   |
|                              |   | Present to ADs/Committees/Stakeholders                       |  |  |     | • |   | • |
|                              | Draft 2023 Metrics report                           | Final Workgroup review of 2023 metrics report                |  |  |     | · |   | ] |
|                              |   | Final TSC review of 2023 metrics report                      |  |  |     |   | Т |   |
|                              | Complete technical analyses for<br>progress report  | Assess status Long-term strategies                           |  |  |     |   |   |   |
|                              |   | Assess status of control measures in other states            |  |  |     |   |   |   |
|                              |   | Assess Emissions trends in MANEVU and<br>Contributing States |  |  |     |   |   | _ |
|                              |   | States begin 60 day FLM Review                               |  |  |     |   | + |   |
|                              |   | Final Submittal to USEPA                                     |  | Due 01/31/2025   | . • |   | + |   |
| 3rd RH SIP<br>Planning Phase | RPO Coordination                                    | Inventory for 3rd RH Planning                                | Quarterly Calls                                    | As needed.   | •   | • |   |   |
|                              | Request OTC Modeling perform<br>2038 Projection Run |  | Will need 2038 projected inventory                 | Milestone date TBD   |     |   |   |   |
|                              | MANEVU Asks developed for RP                        | TBD  | Will need Controlled 2038<br>projected inventory   | Milestone date TBD   |     |   |   |   |
|                              | 120 RH consultation period starts                   |  |  | Milestone date TBD   |     | T |   |   |
|                              | 3rd RH SIP due to EPA                               |  | 40 CFR Part 51.308(f): Due date<br>is July 1, 2028 | 14   |     |   |   |   |



## Questions? Thank You!

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