



**STATEMENT OF THE MID-ATLANTIC/NORTHEAST VISIBILITY
UNION (MANE-VU) STATES CONCERNING A COURSE OF ACTION
WITHIN MANE-VU TOWARD ASSURING REASONABLE PROGRESS
FOR THE SECOND REGIONAL HAZE IMPLEMENTATION PERIOD
(2018-2028)**

The federal Clean Air Act (CAA) and Regional Haze rule require States that are reasonably anticipated to cause or contribute to impairment of visibility in mandatory Class I Federal areas to implement reasonable measures to reduce visibility impairment within the national parks and wilderness areas designated as mandatory Class I Federal areas. Most pollutants that affect visibility also contribute to ozone, fine particulate and sulfur dioxide (SO₂) air pollution. In order to assure protection of public health and the environment, any additional air pollutant emission reduction measures necessary to meet the 2028 reasonable progress goal for regional haze should be implemented as soon as practicable but no later than 2028.

According to the federal Regional Haze rule (40 CFR 51.308 (f)(2)(i) through (iv)), all states must consider, in their Regional Haze SIPs, the emission reduction measures identified by Class I States as being necessary to make reasonable progress in any Class I area. These emission reduction measures are referred to as "Asks." If any State cannot agree with or complete a Class I State's "Asks," the State must describe the actions taken to resolve the disagreement in their Regional Haze SIP. This Ask by the MANE-VU Class I states, was developed through a collaborative process with all of the MANE-VU states. It is designed to identify reasonable emission reduction strategies which must be addressed by the states and tribal nations of MANE-VU through their regional haze SIP updates. This Ask has been developed and presented at this time so that SIPs may be developed and submitted between July of 2018 and July of 2021.

In addressing the emission reduction strategies in the Ask, the MANE-VU states will need to harmonize any activity on the strategies in the Ask with other federal or state

Members
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

Nonvoting Members
U.S. Environmental
Protection Agency
National Park Service
U.S. Fish and Wildlife
Service
U.S. Forest Service

MANE-VU Class I Areas

ACADIA NATIONAL PARK ME
BRIGANTINE WILDERNESS
NJ
GREAT GULF WILDERNESS NH
LYE BROOK WILDERNESS
VT
MOOSEHORN WILDERNESS
ME
PRESIDENTIAL RANGE
DRY RIVER WILDERNESS
NH
ROOSEVELT CAMPOBELLO
INTERNATIONAL PARK
ME/NB, CANADA

requirements that affect the sources and pollutants covered by the Ask. These federal and state requirements include, but are not limited to:

- The 2010 SO₂ standard,
- The Regional Greenhouse Gas Initiative (RGGI), if applicable,
- The Mercury and Air Toxics Standards (MATS), and
- The new 2015 ozone standard.

Because of this need for cross-program harmonization and because of the formal public process required by the federal CAA and state rulemaking processes, it is expected that there will be opportunities for stakeholders and the public to comment on how states intend to address the measures in the Ask.

Many of the MANE-VU states are also members of RGGI. RGGI is a market based cap-and-invest program designed to cost effectively reduce greenhouse gas emissions from the energy sector while returning value to rate-payers. One of the co-benefits of RGGI is that it will also significantly reduce SO₂ and NO_x emissions, the two most important haze precursors. Because of this, the RGGI states, regionally, will likely achieve greater emission reductions than those envisioned in this Ask.

To address the impact on mandatory Class I Federal areas within the MANE-VU region, the Mid-Atlantic and Northeast States will pursue a coordinated course of action designed to assure reasonable progress toward preventing any future, and remedying any existing impairment of visibility in mandatory Class I Federal areas and to leverage the multi-pollutant benefits that such measures may provide for the protection of public health and the environment. Per the Regional Haze rule, being on or below the uniform rate of progress for a given Class I area is not a factor in deciding if a State needs to undertake reasonable measures.

Therefore, the course of action for pursuing the adoption and implementation of measures necessary to meet the 2028 reasonable progress goal for regional haze include the following “emission management” strategies:

1. Electric Generating Units (EGUs) with a nameplate capacity larger than or equal to 25MW with already installed NO_x and/or SO₂ controls - ensure the most effective use of control technologies on a year-round basis to consistently minimize emissions of haze precursors, or obtain equivalent alternative emission reductions;
2. Emission sources modeled by MANE-VU that have the potential for 3.0 Mm⁻¹ or greater visibility impacts at any MANE-VU Class I area, as identified by MANE-VU contribution

- analyses (see attached listing) - perform a four-factor analysis for reasonable installation or upgrade to emission controls;
3. Each MANE-VU State that has not yet fully adopted an ultra-low sulfur fuel oil standard as requested by MANE-VU in 2007 - pursue this standard as expeditiously as possible and before 2028, depending on supply availability, where the standards are as follows:
 - a. distillate oil to 0.0015% sulfur by weight (15 ppm),
 - b. #4 residual oil within a range of 0.25 to 0.5% sulfur by weight,
 - c. #6 residual oil within a range of 0.3 to 0.5% sulfur by weight.
 4. EGUs and other large point emission sources larger than 250 MMBTU per hour heat input that have switched operations to lower emitting fuels – pursue updating permits, enforceable agreements, and/or rules to lock-in lower emission rates for SO₂, NO_x and PM. The permit, enforcement agreement, and/or rule can allow for suspension of the lower emission rate during natural gas curtailment;
 5. Where emission rules have not been adopted, control NO_x emissions for peaking combustion turbines that have the potential to operate on high electric demand days by:
 - a. Striving to meet NO_x emissions standard of no greater than 25 ppm at 15% O₂ for natural gas and 42 ppm at 15% O₂ for fuel oil but at a minimum meet NO_x emissions standard of no greater than 42 ppm at 15% O₂ for natural gas and 96 ppm at 15% O₂ for fuel oil, or
 - b. Performing a four-factor analysis for reasonable installation or upgrade to emission controls, or
 - c. Obtaining equivalent alternative emission reductions on high electric demand days.

High electric demand days are days when higher than usual electrical demands bring additional generation units online, many of which are infrequently operated and may have significantly higher emission rates than the rest of the generation fleet. Peaking combustion turbine is defined for the purposes of this “Ask” as a turbine capable of generating 15 megawatts or more, that commenced operation prior to May 1, 2007, is used to generate electricity all or part of which is delivered to the electric power distribution grid for commercial sale and that operated less than or equal to an average of 1752 hours (or 20%) per year during 2014 to 2016;

(Note: SO₂ emissions for fuel oil units are addressed with Ask item 3.a. above)

6. Each State should consider and report in their SIP measures or programs to: a) decrease energy demand through the use of energy efficiency, and b) increase the use within their state of Combined Heat and Power (CHP) and other clean Distributed Generation technologies including fuel cells, wind, and solar.

This long-term strategy to reduce and prevent regional haze will allow each state up to 10 years to pursue adoption and implementation of reasonable and cost-effective NO_x and SO₂ control measures.

Signed on behalf of the MANE-VU states and tribal nations:



David Foerter, Executive Director
MANE-VU/OTC

August 25, 2017

Listing of emission units that have the potential for 3.0 Mm⁻¹ or greater visibility impacts at any MANE-VU Class I area using actual 2015 emissions for EGUs and 2011 for other emission sources). The complete contribution analyses report is available at <http://www.otcair.org/manevu>.

State	Facility Name	Facility/ ORIS ID	Unit IDs	Max Extinction
MA	Brayton Point	1619	4	4.3
MA	Canal Station	1599	1	3.0
MD	Herbert A Wagner	1554	3	3.8
MD	Luke Paper Company	7763811	001-0011-3-0018	6.0
MD	Luke Paper Company	7763811	001-0011-3-0019	5.9
ME	The Jackson Laboratory	7945211	7945211	10.2
ME	William F Wyman	1507	4	5.6
ME	Woodland Pulp LLC	5974211		7.5
NH	Merrimack	2364	2	3.3
NJ	B L England	2378	2,3	5.6
NY	Finch Paper LLC	8325211	12	5.9
NY	Lafarge Building Materials Inc	8105211	43101	8.1
PA	Brunner Island	3140	1,2	4.0
PA	Brunner Island	3140	3	3.8
PA	Homer City	3122	1	9.3
PA	Homer City	3122	2	8.1
PA	Homer City	3122	3	3.3
PA	Keystone	3136	1	3.2
PA	Keystone	3136	2	3.1
PA	Montour	3149	1	4.4
PA	Montour	3149	2	4.1
PA	Shawville	3131	3,4	3.6