



**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)**

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 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.

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

The following states identified by MANE-VU as contributing to visibility impairment at MANE-VU Class I areas should address this “Ask” in their regional haze SIP updates in addition to any other Class I area state “Ask”; Alabama, Florida, Illinois, Indiana, Kentucky, Louisiana, Michigan, Missouri, North Carolina, Ohio, Tennessee, Texas, Virginia, and West Virginia. There is a separate “Ask” to address visibility impairing emissions from MANE-VU states. Contributing state methodology is documented in a MANE-VU report; “Selection of States for MANE-VU Regional Haze Consultation (2018)”, using actual 2015 emissions for EGUs and 2011 for other emission sources.

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

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. States should pursue an ultra-low sulfur fuel oil standard similar to the one adopted by MANE-VU states in 2007 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 to 0.5% sulfur by weight,
 - c. #6 residual oil 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. 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
IN	Rockport	6166	MB1,MB2	3.8
KY	Big Sandy	1353	BSU1,BSU2	3.5
MI	Belle River		2	4.0
MI	Belle River		1	3.7
MI	St. Clair	1743	1,2,3,4,...6	3.1
NC	KapStone Kraft Paper Corporation	8048011	ST-1,2	6.0
OH	Avon Lake Power Plant	2836	12	9.2
OH	Gen J M Gavin	8102	1	3.3
OH	Gen J M Gavin	8102	2	3.1
OH	Muskingum River	2872	5	7.7
OH	Muskingum River	2872	1,2,3,4	4.4
VA	Yorktown Power Station	3809	3	10.9
VA	Yorktown Power Station	3809	1,2	7.0
WV	Harrison Power Station		1 (25%) 2 (20%)	7.0
WV	Kammer	3947	1,2,3	3.2