



# United States Department of the Interior

## NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225-0287

N3615 (2350)

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April 12, 2018

Joseph Jakuta  
Ozone Transport Commission/Mid-Atlantic/Northeast Visibility Union  
444 North Capitol Street NW #322  
Washington, DC 20001

Dear Mr. Jakuta:

Thank you for the opportunity to comment on the Mid-Atlantic/Northeast Visibility Union (MANE-VU)'s draft Statement of its planned course of action for assuring reasonable progress for the second regional haze implementation period (2018-2028).

Over the past 18 months, MANE-VU has completed a contribution assessment, developed a request for its member states to consider specific control measures as part of the second regional haze state implementation plans (MANE-VU Ask), and consulted with Federal Land Managers and neighboring states concerning the MANE-VU Ask. Our understanding is that individual MANE-VU states are still developing their processes to define which sources will be evaluated for continued visibility improvement in the Class I areas in MANE-VU states.

Because we could not determine which specific sources that the MANE-VU states will be evaluating, we compiled the attached list of sources that may impact Acadia, Mammoth Cave, or Shenandoah National Parks using a simple screening metric. We ask that the states review and consider these sources for inclusion in their long term strategies.

In addition to these major sources, we urge the states with oil and gas point or area source emissions to evaluate oil and gas emission trends and potential for emissions reductions as part of their long term strategy for 2028.

We would like to discuss this further with the MANE-VU Technical Support Committee and the states in the near future. We also would like to learn more about how the screening process in the MANE-VU Ask corresponds with EPA's 2016 Draft Guidance on Progress Tracking Metrics, Long-term Strategies, Reasonable Progress Goals and Other Requirements for Regional

Haze State Implementation Plans for the Second Implementation Period (see especially guidance on page 72, in Section 6.3 of that document).

We look forward to working with MANE-VU on this important program for reducing regional haze affecting Class I national parks and wilderness areas. Pat Brewer (303-969-2153 or [patricia\\_f\\_brewer@nps.gov](mailto:patricia_f_brewer@nps.gov)) of my staff will be following up with you to set up a call.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carol McCoy', with a large, stylized flourish at the end.

Carol McCoy  
Chief, Air Resources Division

cc:

Rob Sliwinski, New York Department of Environmental Conservation and MANE VU Technical Support Committee Chair

## ATTACHMENT

### Screening Metric

EPA’s draft guidance allows use of emissions divided by distance (Q/d) as a surrogate for a modeling analysis to estimate impact. We first summed 2014 NEI NO<sub>x</sub> + PM<sub>10</sub> + SO<sub>2</sub> + SO<sub>4</sub> at a given facility and divided by distance to a specified NPS Class I area. Airports and rail yards were deleted because these mobile sources are not regulated by states. For EGUs with significant Q/d values, we used 2017 CAM data to adjust for changes in emissions since 2014. We also deleted facilities that either had shut down since 2014 or had committed to shut down during the next planning period. To estimate the impact of MANE-VU facilities, we summed the Q/d values across all MANE-VU states relative to ACAD, MACA, and SHEN, ranked the Q/d values relative to each Class I area, created a running total, and identified those facilities contributing to 80% of the total impact at each NPS Class I area. We applied a similar process to facilities in ME relative to ACAD. We merged the resulting lists of facilities and sorted them by their states. Although the numbers of facilities identified for most states were not excessive, we observed that the totals for NY and PA could be considered burdensome. To address this problem, we suggest that a state consider those facilities comprising 80% of the Q/d total, not to exceed the 25 top-ranked facilities.

#### Connecticut

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
754311	PSEG PWR CT LLC/BPT HARBOR STA	1,530	487	3.1	ACAD
754411	WHEELABRATOR BRIDGEPORT LP	1,409	489	2.9	ACAD
715611	C R R A / MID-CONNECTICUT	821	412	2.0	ACAD
715711	MIDDLETOWN POWER LLC	547	421	1.3	ACAD
643411	PSEG FOSSIL LLC/ POWER CT LLC	486	461	1.1	ACAD
754611	COVANTA SOUTHEASTERN CT CO	417	397	1.1	ACAD
8501611	WHEELABRATOR LISBON INC (WM)	327	386	0.8	ACAD
2706711	ALGONQUIN GAS TRANSMISSION (Cromwell)	317	421	0.8	ACAD
588711	COVANTA BRISTOL, INC	300	436	0.7	ACAD

#### District of Columbia

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
2701211	U.S. GSA Central Heating and Refrigeration Plant	258	101	2.5	SHEN

#### Delaware

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
588311	Delaware City Refinery	2,730	233	11.7	SHEN
640911	INDIAN RIVER GENERATING STATION	709	260	2.7	SHEN

Massachusetts

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
8127611	SEMASS PARTNERSHIP	1,616	301	5.4	ACAD
7869811	WHEELABRATOR MILLBURY INC	1,257	322	3.9	ACAD
7947211	WHEELABRATOR NORTH ANDOVER INCORPORATED	865	245	3.5	ACAD
8167211	WHEELABRATOR SAUGUS INC	709	256	2.8	ACAD
7236411	SOLUTIA INC	984	376	2.6	ACAD
6622811	MM TAUNTON ENERGY LLC	674	305	2.2	ACAD
7259211	ARDAGH GLASS INC	383	313	1.2	ACAD
7887011	MEDICAL AREA TOTAL ENERGY PLANT	325	273	1.2	ACAD
5979211	STONY BROOK ENERGY CENTER	298	372	0.8	ACAD
7764911	GENERAL ELECTRIC AIRCRAFT ENGINES	191	256	0.7	ACAD

Maryland

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
7763811	Luke Paper Company	20,159	160	126.3	SHEN
6084311	Raven Power Fort Smallwood LLC	16,848	147	114.8	SHEN
8200011	Lehigh Cement Company - Union Bridge	3,026	114	26.6	SHEN
7931411	Holcim (US), Inc.	2,028	93	21.8	SHEN
7717711	AES Warrior Run	1,844	89	20.8	SHEN
6011511	NRG Morgantown Generating Station	2,517	123	20.4	SHEN
5155011	C.P. Crane LLC	3,248	258	12.6	SHEN
6011911	NRG Chalk Point, LLC	1,732	138	12.6	SHEN
5998011	NRG Dickerson Generating Station	724	71	10.2	SHEN
5857411	Wheelabrator Baltimore, LP	1,413	141	10.0	SHEN
7719011	Montgomery County RRF	551	71	7.7	SHEN
6117011	Naval Support Facility, Indian Head	387	96	4.0	SHEN

Maine

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
8200111	SAPPI - SOMERSET	3,476	107	32.5	ACAD
8028411	DRAGON PRODUCTS CO - THOMASTON	1,157	41	28.3	ACAD
8026411	CATALYST PAPER OPERATIONS INC. - RUMFORD	2,829	161	17.6	ACAD
5974211	WOODLAND PULP LLC	1,482	102	14.6	ACAD
7764711	VERSO PAPER - ANDROSCOGGIN MILL	1,803	136	13.2	ACAD
5760811	PENOBSCOT ENERGY RECOVERY CO	481	53	9.1	ACAD
7946611	S D WARREN CO - WESTBROOK	901	141	6.4	ACAD
5823511	FPL ENERGY WYMAN LLC	567	124	4.6	ACAD
5222111	MID MAINE WASTE ACTION CORP	302	129	2.3	ACAD
5223011	REENERGY LIVERMORE FALLS LLC	209	129	1.6	ACAD
7719211	MAINE INDEPENDENCE STATION	130	90	1.4	ACAD
5974111	COVANTA - JONESBORO	126	115	1.1	ACAD
7718411	COVANTA WEST ENFIELD	126	138	0.9	ACAD
8240811	LINCOLN PAPER AND TISSUE, LLC	134	151	0.9	ACAD
5676911	REENERGY STRATTON LLC	164	188	0.9	ACAD
8028611	WESTBROOK ENERGY CENTER	105	144	0.7	ACAD

New Hampshire

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
7287811	PSNH - SCHILLER STATION	389	200	2.0	ACAD
7301111	WHEELABRATOR CONCORD COMPANY LP	411	249	1.7	ACAD
7758711	MONADNOCK PAPER MILLS INC	206	287	0.7	ACAD
17167211	BURGESS BIOPOWER	146	207	0.7	ACAD
7513011	APC PAPER COMPANY INC	209	305	0.7	ACAD

New Jersey

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
7989011	CARNEYS POINT GENERATING PLANT	1,968	249	7.9	SHEN
8093811	Logan Generating Plant	1,224	259	4.7	SHEN
7201311	Paulsboro Refining Company LLC	975	273	3.6	SHEN
7903711	Phillips 66 Bayway Refinery	1,215	390	3.1	SHEN
8177011	Covanta Essex Company	887	402	2.2	SHEN
7392311	PSEG Bergen Generating Station	665	564	1.2	ACAD
7906111	Union County Resource Recovery Facility	649	597	1.1	ACAD
7990011	Cogen Technologies Linden Venture, L.P.	499	592	0.8	ACAD
6719711	NORTH JERSEY ENERGY ASSOC A LP	470	614	0.8	ACAD
7474911	PSEG FOSSIL LLC MERCER GENERATING STATION	480	658	0.7	ACAD

Rhode Island

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
5486911	DOMINION ENERGY MANCHESTER STREET, INC.	231	331	0.7	ACAD

New York

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
17052711	Red-Rochester LLC At Eastman Business Park	12,708	478	26.6	SHEN
8105211	LAFARGE BUILDING MATERIALS INC	6,874	543	12.7	SHEN
8121711	NORTHPORT POWER STATION	3,009	515	5.8	ACAD
7991711	INTERNATIONAL PAPER TICONDEROGA MILL	2,097	380	5.5	ACAD
8325211	FINCH PAPER LLC	2,055	408	5.0	ACAD
7968211	ALCOA MASSENA OPERATIONS (WEST PLANT)	2,883	724	4.0	SHEN
7814711	MORTON SALT DIV	1,590	416	3.8	SHEN
7822211	ANCHOR GLASS CONTAINER CORP	1,298	374	3.5	SHEN
7805611	DUNKIRK STEAM GENERATING STATION	1,282	409	3.1	SHEN
7210211	GUARDIAN GENEVA FLOAT GLASS FACILITY	1,251	453	2.8	SHEN
7994011	CON ED-EAST RIVER GENERATING STATION	1,106	413	2.7	SHEN
8175411	BOWLINE POINT GENERATING STATION	1,322	535	2.5	ACAD
7417811	AES SOMERSET LLC	1,209	494	2.4	SHEN
8123611	WHEELABRATOR WESTCHESTER LP	1,071	447	2.4	SHEN
7417011	COVANTA NIAGARA LP	1,092	468	2.3	SHEN
7993311	HEMPSTEAD RESOURCE RECOVERY FACILITY	1,014	442	2.3	SHEN
8325311	LEHIGH NORTHEAST CEMENT COMPANY	919	407	2.3	ACAD
8309011	RAVENSWOOD GENERATING STATION	940	417	2.3	SHEN
8542611	AES CAYUGA	955	430	2.2	SHEN
7221611	EF BARRETT POWER STATION	1,090	558	2.0	ACAD
8427811	ROSETON GENERATING STATION	948	512	1.9	ACAD
7982311	ASTORIA GENERATING STATION	811	561	1.4	ACAD
7981511	PORT JEFFERSON POWER STATION	581	497	1.2	ACAD
7416911	GLOBE METALLURGICAL INC	978	842	1.2	ACAD
8104811	BLACK RIVER GENERATION LLC	583	569	1.0	ACAD
7844111	ARTHUR KILL GENERATING STATION	593	594	1.0	ACAD
8035411	TGP COMPRESSOR STATION 245	535	541	1.0	ACAD
8322311	NORTHEAST SOLITE CORPORATION	446	484	0.9	ACAD
7209911	GENERAL CHEMICAL LLC	536	617	0.9	ACAD
7982011	ONONDAGA CO RESOURCE RECOVERY FACILITY	510	612	0.8	ACAD
7804411	OWENS-BROCKWAY GLASS CONTAINER INC	505	648	0.8	ACAD
7995311	CON ED-74TH STREET STA	418	565	0.7	ACAD
7986111	CON ED-59TH ST STA	408	567	0.7	ACAD
8123211	HUNTINGTON RESOURCE RECOVERY FACILITY	371	515	0.7	ACAD
8107511	REVERE SMELTING & REFINING CORP	385	545	0.7	ACAD
8539211	INDEPENDENCE STATION	444	629	0.7	ACAD
7800811	OWENS-CORNING INSULATING SYSTEMS- FEURA BUSH	313	451	0.7	ACAD
7980511	OSWEGO HARBOR POWER	432	636	0.7	ACAD
7801111	SELKIRK COGENERATION PROJECT	304	451	0.7	ACAD

Pennsylvania

EIS ID	Facility Name	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
3866111	GENON NE MGMT CO/KEYSTONE STA	31,020	217	143.2	SHEN
3005211	HOMER CITY GEN LP/ CENTER TWP	13,925	196	70.9	SHEN
2905911	GENON NE MGMT CO/CONEMAUGH PLT	12,422	179	69.5	SHEN
3005111	NRG WHOLESALE GEN/SEWARD GEN STA	8,946	180	49.7	SHEN
8204511	USS/CLAIRTON WORKS	6,269	211	29.8	SHEN
4952111	MAGNESITA REFRACTORIES/YORK	4,568	164	27.8	SHEN
3881111	MONTOUR LLC/MONTOUR SES	7,557	272	27.7	SHEN
6594511	CAMBRIA COGEN CO/EBENSBURG	4,377	178	24.6	SHEN
6463511	PPG IND INC/WORKS NO 6	3,230	161	20.1	SHEN
9248211	TEAM TEN/TYRONE PAPER MILL	3,216	196	16.4	SHEN
8404811	NRG MIDWEST LP/CHESWICK	3,410	226	15.1	SHEN
7872711	APPVION INC/SPRING MILL	1,527	159	9.6	SHEN
3881611	HERCULES CEMENT CO LP/STOCKERTOWN	3,085	322	9.6	SHEN
6652211	PHILA ENERGY SOL REF/ PES	2,675	280	9.5	SHEN
7409311	USS CORP/EDGAR THOMSON WORKS	1,969	217	9.1	SHEN
8406511	SCHUYLKILL ENERGY RES/ST NICHOLAS COGEN	2,360	273	8.6	SHEN
6594311	EBENSBURG POWER CO/EBENSBURG COGENERATION PLT	1,500	177	8.5	SHEN
6651211	ESSROC/NAZARETH LOWER CEMENT PLT I II III	2,535	319	7.9	SHEN
6603511	PITTSBURGH GLASS WORKS/MEADVILLE WORKS 8	2,639	337	7.8	SHEN
6597611	LEHIGH CEMENT CO LLC/EVANSVILLE CEMENT PLT & QUARRY	1,997	262	7.6	SHEN
7409411	US STEEL CORP/IRVIN PLT	1,529	214	7.1	SHEN
6582211	KEYSTONE PORTLAND CEMENT/EAST ALLEN	2,212	312	7.1	SHEN
4737311	SUNBURY GENERATION LP/SUNBURY SES	1,640	243	6.7	SHEN
8219711	COVANTA DELAWARE VALLEY LP/DELAWARE VALLEY RES REC	1,676	261	6.4	SHEN
3186811	PA STATE UNIV/UNIV PARK CAMPUS	1,293	210	6.1	SHEN
4760211	SCRUBGRASS GENERATING CO LP/KENNERDELL PLT	1,621	295	5.5	SHEN
6595211	KIMBERLY CLARK PA LLC/CHESTER OPR	1,409	265	5.3	SHEN
7889111	GRAYMONT PA INC/PLEASANT GAP, CON-LIME & BELLEFONTE PLTS	1,179	223	5.3	SHEN
6582111	INTL WAXES INC/FARMERS VALLEY	1,637	328	5.0	SHEN
4105111	GILBERTON POWER CO/JOHN B RICH MEM POWER STA	1,210	269	4.5	SHEN
6559611	DOMTAR PAPER CO/JOHNSONBURG MILL	1,269	289	4.4	SHEN
4966711	UNITED REFINING CO/WARREN PLT	1,376	333	4.1	SHEN
8330811	ARCELORMITTAL MONESSEN LLC/MONESSEN COKE PLT	795	200	4.0	SHEN
3881711	MARTINS CREEK LLC/MARTINS CREEK	1,255	337	3.7	SHEN
6580811	ARMSTRONG CEMENT & SUPPLY/WINFIELD	900	245	3.7	SHEN
7889011	PANTHER CREEK POWER OPR LLC/NESQUEHONING	1,066	293	3.6	SHEN
7874511	MONROE ENERGY LLC/TRAINER	947	261	3.6	SHEN
8331411	WHEELABRATOR FRACKVILLE/MOREA PLT	953	270	3.5	SHEN
6581211	LANCASTER CNTY RRF/ LANCASTER	616	185	3.3	SHEN
3762011	MT CARMEL COGEN/CULM FIRED COGEN PLT	827	258	3.2	SHEN
2989611	GUARDIAN IND CORP/JEFFERSON HILLS	667	209	3.2	SHEN
7407611	SHENANGO INC/SHENANGO COKE PLT	747	238	3.1	SHEN
8220011	WHEELABRATOR FALLS INC/FALLS TWP	946	325	2.9	SHEN
4843611	COVANTA PLYMOUTH RENEWABLE ENERGY/ PLYMOUTH	812	280	2.9	SHEN
7991611	ALLEGHENY LUDLUM LLC/BRACKENRIDGE	643	229	2.8	SHEN
6532511	AMER REF GROUP/BRADFORD	951	341	2.8	SHEN

4120011	YORK CNTY SOLID WASTE/YORK CNTY RESOURCE RECOVERY	451	175	2.6	SHEN
6621911	LAFARGE CORP/WHITEHALL PLT	759	303	2.5	SHEN
8141411	JEWEL ACQUISITION/MIDLAND FAC	668	271	2.5	SHEN
4952011	PROCTER & GAMBLE PAPER PROD CO/MEHOOPANY	832	347	2.4	SHEN
3020711	OWENS-BROCKWAY GLASS CONTAINER INC/CRENSHAW PLT 19	592	263	2.2	SHEN
8141311	AES BEAVER VALLEY LLC/BEAVER VALLEY LLC	586	267	2.2	SHEN
2990311	ALLEGHENY ENERGY SUPPLY/SPRINGDALE	491	225	2.2	SHEN
3884311	CARMEUSE LIME INC/MILLARD LIME PLT	454	211	2.2	SHEN
3892811	AK STEEL CORP/BUTLER WORKS	554	259	2.1	SHEN
6558911	NORTHAMPTON GEN CO/NORTHAMPTON	769	671	1.1	ACAD
4735811	WESTWOOD GEN LLC/GEN STA	644	743	0.9	ACAD





# United States Department of the Interior

NATIONAL PARK SERVICE  
Air Resources Division  
P.O. Box 25287  
Denver, CO 80225-0287

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N3615 (2350)

October 22, 2018

Ali Mirzakhali  
Delaware Department of Natural Resources and Environmental Control  
156 South Slate Street  
Dover, DE 19901

Dear Mr. Mirzakhali:

As part of Delaware's development of a state implementation plan (SIP) for the second regional haze planning period (2018-2028), the National Park Service Air Resources Division would like to initiate consultation with the Delaware Department of Natural Resources and Environmental Control (DDNREC) to discuss which facilities the state is considering for possible future emission reductions.

Over the past 18 months, Delaware and the other MANE-VU states have completed a visibility contribution assessment (led by Toms Downs, MEDEP<sup>1</sup>), conducted facility screening analyses, and developed the MANE-VU Ask for Midwestern and eastern states to consider emission reduction measures for specific facilities and source categories by 2028. The Federal Land Managers (FLM) commented to MANE-VU on these technical analyses in 2016, 2017, and 2018.

In a letter dated April 12, 2018, the Air Resources Division provided MANE-VU with a list of facilities covering the MANE-VU states for discussion. Based on a signed but undated letter from MANE-VU, MANE-VU asked us to discuss source selection with individual states. Hence, our outreach to you via this letter.

As part of the FLM consultation process, we generated the attached list of facilities for consideration as the state prepares its reasonable progress SIP under the Regional Haze Rule. We would like to discuss this list in light of Delaware's list of sources for four factor analyses. The NPS developed the attached list of facilities using a Class I centric approach; that is, we looked

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<sup>1</sup> Tom Downs, Maine Department of Environmental Protection (ME DEP). 2018. Mid-Atlantic/Northeast U.S. Visibility Data 2004-2016 (2<sup>nd</sup> RH SIP Metrics)

at the impact of eastern facilities on Acadia National Park (ACAD) and Shenandoah National Park (SHEN), the NPS Class I areas located in or nearest the MANE-VU states. For each NPS Class I area, we identified the facilities associated with contributing 80% of the impacts. In keeping with EPA's guidance, we adjusted the inventory to reflect those facilities that had been controlled, shut down, or changed fuels.

EPA 2016 draft guidance section 6.3 (p. 72)<sup>2</sup> states:

Regardless of how it has selected its screening threshold for visibility impacts, the state should demonstrate that its threshold, in combination with other aspects of its screening approach, results in the screening process selecting for full analysis and decision a combination of major stationary sources, minor stationary sources and minor/area stationary source categories that collectively account for a reasonably large fraction of all the in-state major, minor and area stationary source emissions contributing to any PM species that is a significant portion of the anthropogenic extinction budget....The EPA considers 80 percent to be a reasonably large fraction for this purpose in the second planning period.

We would like to arrange a conference call with you in the next month to go over the facilities on our list that are located in Delaware to determine if those facilities are also on your list. Specifically we would like to discuss how the emissions from these facilities will change between 2018 and 2028 and which facilities will be evaluated as part of the state's long term strategy supporting continued visibility improvement in the Class I areas in MANE-VU states. Our goal is to better understand the DDNREC's approach to this next round of regional haze planning.

We appreciate the opportunity to work with the DDNREC to improve visibility in Class I national parks and wilderness areas. If you have questions, please contact Pat Brewer at 303-969-2153 or [patricia\\_f\\_brewer@nps.gov](mailto:patricia_f_brewer@nps.gov).

Sincerely,



Carol McCoy  
Chief, Air Resources Division

Attachment

Facilities potentially contributing to visibility impacts at Acadia or Shenandoah National Parks, using  $Q = \text{combined NO}_x, \text{PM}_{2.5}, \text{SO}_2 \text{ and } \text{SO}_4 \text{ emissions by facility from the 2014 version 2 National Emissions Inventory or EPA's 2017 Clean Air Markets Database divided by } d = \text{distance from the facility to the nearest boundary of the national park.}$

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<sup>2</sup> U.S. EPA 2016 Draft Guidance on Progress Tracking Metrics, Long-term Strategies, Reasonable Progress Goals and Other Requirements for Regional Haze State Implementation Plans for the Second Implementation Period.

Year	Inventory	EIS ID	Facility Name	NAICS Code Description	Latitude	Longitude	State	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
2014	NEI	588311	Delaware City Refinery	Petroleum Refineries	39.589	-75.636	DE	2,730	233	11.73	SHEN
2014	NEI	640311	HAY ROAD ENERGY CENTER	Electric Power Generation, Transmission and Distribution	39.744	-75.507	DE	927	249	3.72	SHEN