
MANE-VU

Mid-Atlantic/Northeast Visibility Union

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November 15, 2001

Mr. James Murphy
Air Quality Supervisor
Allegheny Energy Supply
4350 Northern Pike
Monroeville, PA 05146

Dear Mr. Murphy:

On behalf of MANE-VU and NESCAUM, I would like to thank you for your interest in the July 24, 2001 report entitled, "A Basis for Control of BART-Eligible Sources." As project manager for this report, I would like to take this opportunity to respond to some of your comments on this document.

A. Stakeholder Involvement

This report was published in the middle of our second-year grant to support state efforts in planning for compliance with requirements of the regional haze rule. A separate task that was agreed to in our first-year grant was to explore organizational structures for a potential regional planning organization hosted by the Ozone Transport Commission. This deliverable was submitted at the end of OTC's first-year grant as a recommendation for the MANE-VU Board and resulted in the March 28 resolution which your comments refer to. These recommendations were considered at the inaugural meeting of the MANE-VU Board on July 24, 2001, the same day the NESCAUM report was published. While it would have been ideal to have a fully developed mechanism for stakeholder input and an organizational structure in place prior to the release of this document, such a mechanism was not in place at that time. The stakeholder meeting on September 19, 2001 was designed to serve this role. As we move forward, stakeholder outreach mechanisms will be in place to allow for timely input on RPO work products.

B. Focus on Electric Utility Source Category

Allegheny Energy Supply correctly points out that NESCAUM focused its analysis of potential emissions reductions on the electric utility source category. The primary reason for focusing on this sector was the availability of accurate emissions information and dates of operation which allowed us to determine which sources were BART eligible and which were not. As Figures V-3 and V-8 of the BART report demonstrate, this sector (shown in the figures as green bars) represent an overwhelming majority of sulfur dioxide and nitrogen oxide emissions produced by all 26 source categories. Thus, a focus on this particular source category seemed an appropriate focus for a first effort at understanding the implications of the proposed BART rule. With respect to the other 25 source categories, the report does list the other 25 source categories in Chapter III. The emissions from all 26 BART source categories are compared with all point source emissions within the 29 state source region in Table

V-1 and V-3, providing some context for the discerning the contribution of the other 25 source categories. Similar analysis of the other 25 source categories will be conducted in the future.

C. Technical Basis for Identification of “Region of Influence”

Analysis of hundreds of back trajectories calculated for days with the worst visibility indicate that meteorological transport from regions of the Midwest and Southeast plays a role in MANE-VU’s visibility problems. Eulerian grid models have demonstrated that sulfur dioxide emissions from these same regions result in sulfate deposition in and around New England Class I areas. In addition, these same emissions are strongly correlated with wet sulfate deposition as monitored by the National Acid Deposition Program (NADP). Factor analysis has identified two source profiles representative of coal combustion activities which together account for more than 60 percent of the measured mass and over two-thirds of the visibility impairment experienced at Brigantine Wilderness Area on days with the 20 percent worst visibility. Back trajectories from the days with the highest contribution from these coal associated source profiles indicate the strongest geographical association with the same regions of the industrial Midwest and Southeast. NESCAUM does not feel that reliance on four independent techniques which produce highly consistent geographical associations between sources of sulfur dioxide in the Midwest and Southeast U.S. and impaired visibility in Class I areas of the Northeast and Mid-Atlantic constitutes an “overly simplistic reliance on the back trajectory analysis of precursor emissions.” This is especially true given the extensive qualification which was attributed to the source region ultimately identified as “preliminary” and “tentative.” NESCAUM certainly feels that refinements to these techniques as well as the application of new approaches will yield more detailed information regarding which specific areas within the overall preliminary source region identified as contributing most significantly to regional haze.

D. Identification of BART-Eligible Sources

NESCAUM regrets the unfortunate inclusion of Unit 3 of the Mitchell power station which is not a boiler, but rather a generating unit. Given that this analysis identified over 300 steam-electric boilers out of more than 2000 included in the Acid Rain program database, it is perhaps inevitable that a few mistakes may be present in the analysis. NESCAUM took great care in trying to minimize the number of mistakes in Appendix A and B. We plan to continue improving these lists of fossil-fuel fired steam electric boilers as well as develop lists for the other 25 source categories. Stakeholder input will greatly assist in minimizing the number of mistakes during this process.

E. Presumptive NO_x and SO₂ BART Controls

A presumptive level of control for previously uncontrolled sources does not ignore or, in fact, replace the case-by-case engineering analysis that will be required for each BART determination. Rather the presumptive level of control merely codifies what level of control EPA considers reasonable for a typical uncontrolled utility boiler. NESCAUM’s use of presumptive levels of control is likely to overestimate total emissions reductions which is likely to be achieved through the BART program, but is appropriate for determining potential emissions reductions which might be achieved through this program.

Sincerely,

A handwritten signature in black ink that reads "Gary Kleiman". The signature is written in a cursive style with a long, sweeping tail on the letter "n".

Gary Kleiman
Environmental Analyst,
Northeast States for Coordinated Air Use Management

Cc: Bruce Carhart, OTC
Dick Valentinetti, Vermont DEC
Susan Wierman, MARAMA
Arthur Marin, NESCAUM