
MANE-VU

Mid-Atlantic/Northeast Visibility Union

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November 15, 2001

Mr. Dan Steen
General Environmental Engineer
FirstEnergy Corporation
76 South Main Street, 13th Floor
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Dear Mr. Steen:

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 Input

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. Presumptive NO_x and SO₂ BART Controls

A presumptive level of control for previously uncontrolled sources does not 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. FirstEnergy's concerns related to energy supply and price stability will necessarily be considered in the BART determination process.

C. Back Trajectory and Source Attribution Analyses

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 feel that the use of 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 compensates for the inherent uncertainty associated with any individual trajectory and is adequate for identifying a preliminary source region. The identified source region was extensively qualified 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.

Sincerely,



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

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