



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
1234 Market Street
20th Floor
Philadelphia, PA 19106

1.A.2. (NER-RSS)

January 28, 2021

Ms. Katherine S. Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Dear Ms. Dykes:

The National Park Service (NPS) appreciates the opportunity to review and provide input on the Connecticut Regional Haze State Implementation Plan (SIP) Revision Second Implementation Period (2018-2028). In general, the NPS believes the state has done a good job outlining and incorporating the technical analyses produced by the Mid-Atlantic New England Visibility Union (MANE-VU). However, we continue to recommend additional analyses to evaluate emission reduction opportunities to address haze causing pollutants affecting visibility in NPS Class I areas.

Under the Clean Air Act (§§169A and B) and Federal Regional Haze Rule (40 CFR §51.308), states are required to develop SIPs and engage substantively with agencies that manage national parks and wilderness areas designated as Class I areas. Connecticut does not have a Class I area; however, emissions from sources within the state do affect NPS-managed Class I areas in the region, e.g., Acadia National Park in Maine and Shenandoah National Park in Virginia.

The NPS Air Resources Division (ARD) sent a letter to Connecticut Department of Energy and Environmental Protection (CDEEP) in October of 2018 recommending sources for formal four-factor analyses as provided by the Federal Regional Haze Rule. These sources included four municipal waste combustors (MWCs) and one electric generating unit (EGU). In early 2020, the CDEEP initiated the 60-day Federal Land Manager (FLM) consultation process, during which we noted that the four-factor analyses identified in 2018 were not included in the draft SIP for FLM review.

During a March 2020 consultation meeting, NPS and CDEEP specifically discussed MANE-VU's three inverse megameter (Mm^{-1}) screening threshold, used to identify sources for four-factor analysis, and the NPS perspective that this threshold is too high. This threshold – equivalent to approximately one change in visibility – does not adequately consider cumulative visibility impacts or those that may occur at Class I areas below that threshold. By applying MANE-VU's three Mm^{-1} threshold, CDEEP determined no four-factor analyses on state sources were warranted. We do not agree with this determination.

After review of the updated emission inventory data in the current draft SIP (Table 5.3) and the relevant regulatory limits for sources, we again recommend the following sources for a four-factor analysis: Wheelabrator Bridgeport, LP, CRRA/Mid-Connecticut, Covanta Southeastern CT, and Wheelabrator Lisbon LP. Similar MWCs in Maryland and Virginia are already achieving significantly lower (25% lower) nitrogen oxide emissions or will be by the end of 2021. It may be possible for sources in Connecticut to achieve a similarly low rate using improved combustion technology.

The viability of this potential improvement can be best explored through a formal four-factor analysis of each of these sources. Further, we remind CDEEP that the U.S. Environmental Protection Agency's Office of Air Quality Planning and Standards has stated, on several occasions, that it expects states to complete some four-factor analyses, otherwise a SIP may be deemed incomplete.

Finally, the NPS notes that control requirements for the EGU Middletown Unit 3 boiler as outlined in the current draft SIP includes only seasonal ozone-specific limits. We recommend that CDEEP require year-round emission limits for Middletown Unit 3. In doing so, CDEEP would be meeting an important element of MANE-VU's strategy for EGUs to ensure "...the most effective use of control technologies on a year-round basis to consistently minimize emissions of haze precursors."

The NPS appreciates having the opportunity to review and comment on this important draft SIP and look forward to continuing to work with Connecticut and other MANE-VU states on achieving clean air and clear views for our national parks into the future.

If you have any questions, please contact Holly Salazer (814-321-3309) with the NPS Regional Office (Interior Region 1) or Melanie Peters (720-644-7632) with the NPS Air Resources Division.

Sincerely,

A handwritten signature in black ink, appearing to read "Gay Vietzke", with a long horizontal line extending to the right from the end of the signature.

Gay Vietzke
Regional Director

cc:

Jonathan Meade, Associate Regional Director, Resource Stewardship and Science, DOI Region 1
Carmen T. Chapin, Division Chief, Natural Resources, DOI Region 1
John Vimont, Chief (Acting), Air Resources Division (ARD), Natural Resources Stewardship and Science Directorate (NRSS), Washington Office (WASO)
Kirsten King, Chief, Policy, Planning and Permit Review Branch, ARD, NRSS, WASO