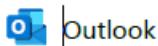


## **Attachment C: Minutes from the Consultation with FLMs**

### **C.1 Connecticut Department of Energy and Environmental Protection Communications to FLMs during 60-day Formal Review Period**

Supporting documentation for Connecticut's communication to FLMs during formal FLM review period is provided below. The following documents are included in this section:

- Connecticut's Initiation of Formal Review Period (9/24/24)
- Connecticut's Presentation to interested FLMs – Regional Haze Progress Report for the Second Planning Period Overview (10/24/24)



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## CT Draft Regional Haze Progress Report - FLM 60-day Formal Consultation

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From Fritz, Amanda <Amanda.Fritz@ct.gov>

Date Tue 9/24/2024 11:30 AM

To Rackauskas, Eric <rackauskas.eric@epa.gov>; Ayla Martinelli <Martinelli.Ayla@epa.gov>; Melanie Peters <Melanie\_Peters@nps.gov>; Don Shepherd <Don\_Shepherd@nps.gov>; Holly Salazer <Holly\_Salazer@nps.gov>; scott.copeland@colostate.edu <scott.copeland@colostate.edu>; Ralph Perron <ralph.perron@usda.gov>; Tim Allen <Tim\_Allen@fws.gov>

Cc Wholean, Kiernan <Kiernan.Wholean@ct.gov>

2 attachments (13 MB)

MV\_RH\_PR\_DRAFT\_FLMs.pdf; Attachment A - MANEVU Technical Support Committee's 2022 Visibility Data Report.pdf;

Dear representatives from the U.S. Fish and Wildlife Service, U.S. Forest Service, and the U.S. National Park Service,

The CT Regional Haze planning team has completed a draft Regional Haze Progress Report for the second planning period. We are providing it to you today, September 24, 2024, to initiate the 60-day Federal Land Manager (FLM) consultation period. A copy of the draft Progress Report and the MANEVU 2004-2022 Visibility Trends Report are attached to this email.

We would like to set up a time to meet with you via Teams in October (or whatever time is most useful and convenient to you) to provide an overview and summary of our draft plan. Our team is open to additional meetings and/or periodic check-ins during the 60-day review period to discuss any topics of interest. You're also welcome to reach out with questions at any time. For this 60-day formal consultation period, we request that you provide any comments on the draft Progress Report by November 25, 2024.

Thank you,

Amanda Fritz  
Air Pollution Control Engineer II  
Planning and Standards  
Bureau of Air Management  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127

# Regional Haze Progress Report for the Second Planning Period Overview

FLM Consultation

October 24, 2024



**Connecticut**  
Department of Energy &  
Environmental Protection

Amanda Fritz  
Bureau of Air Management



## Long Term Strategy

- Implementation of a low sulfur fuel program as contained in Regulations of Connecticut State Agencies (RCSA) sections [22a-174-19a](#) and [22a-174-19b](#)
- Control of nitrogen oxides (NOx) emissions from fuel-burning equipment at major stationary sources of NOx as contained in RCSA section [22a-174-22e](#)
- Control of NOx emissions from high emission units at non-major sources of NOx as contained in RCSA section [22a-174-22f](#)
- Control of emissions from Municipal Waste Combustors (MWCs) as required in RCSA section [22a-174-38](#)

## Low Sulfur Fuel Oil Standard

SO<sub>2</sub> emissions from fuel oil combustion in Connecticut and in the MANEVU region are lower for 2020 than for 2017.

2017 and 2020 Fuel Oil SO <sub>2</sub> Emissions in Connecticut and the MANEVU Region (Tons)						
Sector	Connecticut			MANEVU Total		
	2017	2020	Difference	2017	2020	Difference
Electric Generation	161	77	-84	9,395	6,804	-2,591
Industrial	31	26	-5	3,769	2,142	-1,627
Commercial/Institutional	151	42	-109	3,995	1,847	-2,148
Residential	1,172	36	-1,136	9,805	215	-9,590
Total	1,515	181	-1,334	26,964	11,008	-15,956

3

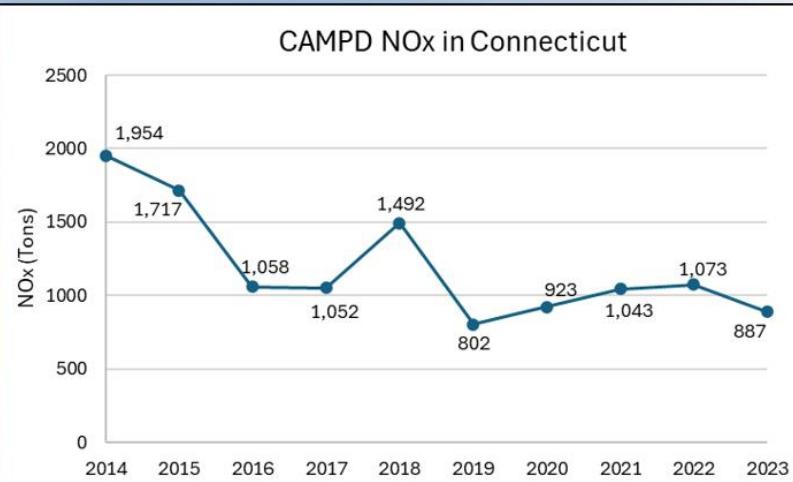
## Point and Area Sources

Both Connecticut and the MANEVU region have seen significant reductions for point and areas sources, in part due to regulations regarding major and non-major electric generating units and other stationary sources.

2017 and 2020 Point and Area Source NO <sub>x</sub> Emissions in Connecticut and the MANEVU Region (Tons).						
Category	Connecticut			MANEVU Total		
	2017	2020	Difference	2017	2020	Difference
Point	4,939	4,319	-620	180,954	140,095	-40,859
Area	14,294	12,882	-1,412	362,434	334,808	-27,626
Total	19,233	17,201	-2,032	543,388	474,903	-68,485

4

## Control of NOx at CAMPD Sources



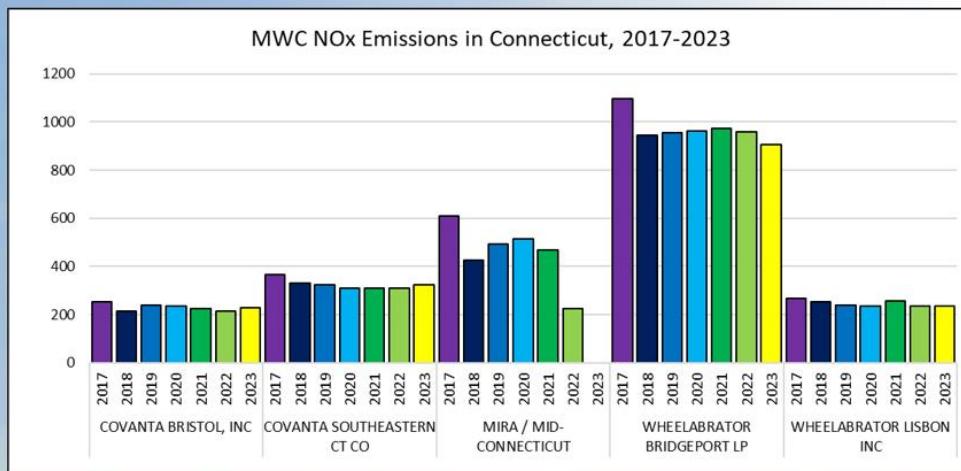
Notable declines in NOx emissions:

- 2019 - the first full year of implementation of Phase 1 of RCSA section 22a-174-22e
- 2023 - the first year of Phase 2 emission limits under the rule

5

## Control of NOx from Municipal Waste Combustors

The drastic emissions decrease in 2022 at the MIRA/Mid Connecticut facility was due to permanent shutdown of the facility mid-year.



6

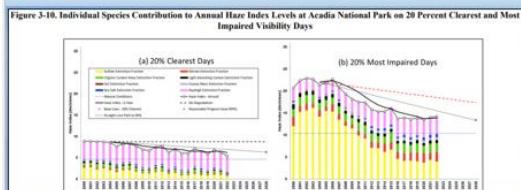
# Visibility Progress

Current five-year haze indexes (Deciviews) are already below the modeled 2028 RPGs at most of the Class I areas.

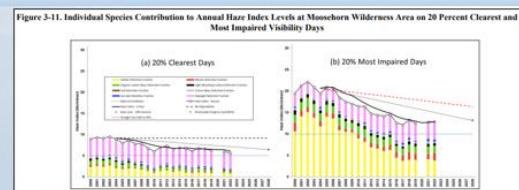
Class I Area	State/Province	20% Clearest Days			20% Most Impaired Days		
		RPG 2028	Current 2018-2022	Difference	RPG 2028	Current 2018-2022	Difference
Acadia National Park	ME	6.33	6.20	-0.13	13.35	13.84	0.49
Moosehorn Wilderness Area	ME	6.45	6.10	-0.35	13.12	12.86	-0.26
Roosevelt Campobello Int'l Park	NB						
Great Gulf Wilderness Area	NH	5.06	4.53	-0.53	12.00	11.82	-0.18
Presidential Range - Dry River Wilderness Area	NH						
Brigantine Wilderness Area	NJ	10.47	9.97	-0.50	17.97	16.91	-1.06
Lye Brook Wilderness Area	VT	3.86	4.41	0.55	13.68	13.34	-0.34

7

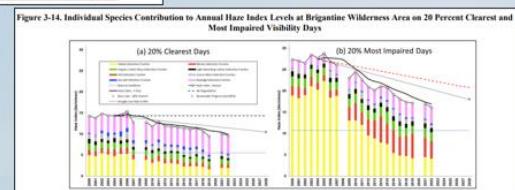
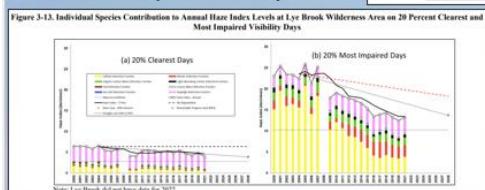
## Species Contribution to Annual Haze Index Levels



Haze Index decreases were primarily due to sulfate reductions, especially for the 20% most impaired days.

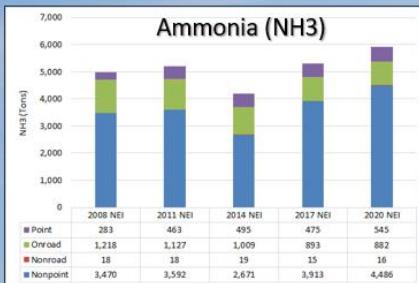


Additional visibility metrics data available in the [MANEVU Visibility Trends 2004-2022 Report](#).

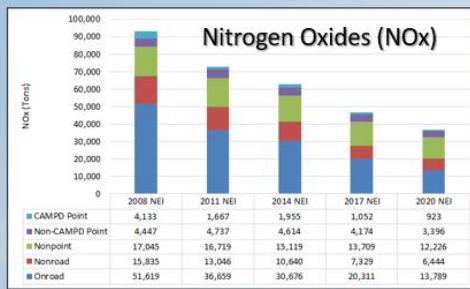
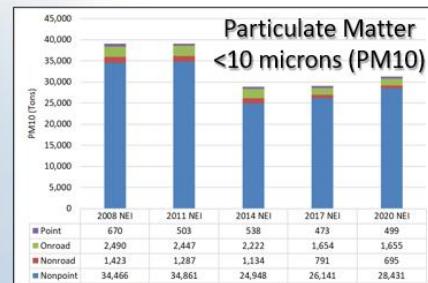


8

## Emission Reductions in Connecticut – NH3, NOx, PM10

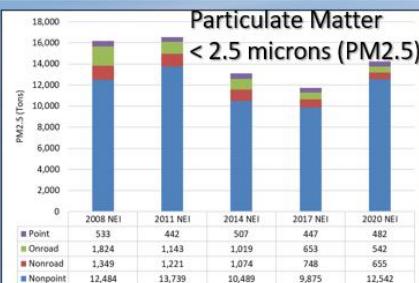


NH3 and PM10 increased in the recent 3 NEIs most likely due to estimation methodology changes. Meanwhile, NOx consistently decreased every NEI year.



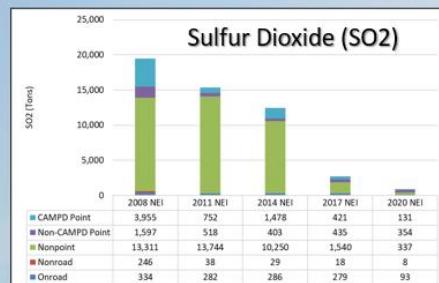
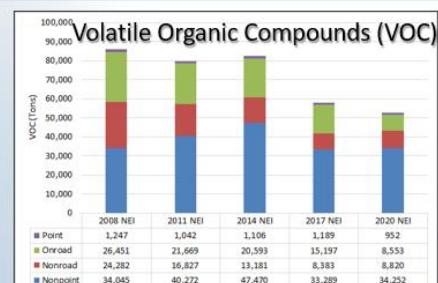
9

## Emission Reductions in Connecticut – PM2.5, SO2, VOC



PM2.5 increased for the 2020 NEI for similar reasons as PM10. Meanwhile, VOC decreased significantly and SO2 decreased drastically since the 2008 NEI.

Additional MANEVU emissions data available in the [MANEVU Emissions Trends Report](#).



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## Conclusion

Based on the information and data presented in this progress report, Connecticut declares that no further revision of the existing plan is needed at this time.

FLM comments due to [Amanda.Fritz@ct.gov](mailto:Amanda.Fritz@ct.gov) by November 25, 2024.

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### C.2 Formal Federal Land Manager Responses

Supporting documentation for FLMs declining to submit comments is provided below. The following documents are included in this section:

- U.S. National Parks Service (10/10/24)
- U.S Fish and Wildlife Service (10/24/24)
- U.S. Forest Service (10/24/24)

While no formal comments were submitted, FLMs pointed out that there were typos in the discussion with respect to Table 6-1 through 6-6 which have been corrected. The Connecticut Department of Energy and Environmental Protection appreciates the assistance of the Land Managers.

SH

Salazer, Holly<Holly\_Salazer@nps.gov>

To: Fritz, Amanda; Rackauskas, Eric <rackauskas.eric@epa.gov>; +6 others  
Cc: Wholean, Kiernan

...

Thu 10/10/2024 1:04 PM

⚠ This sender Holly\_Salazer@nps.gov is from outside your organization.

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Start reply with: Understood. Thank you. Thank you for the update. Thank you for letting me know.

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello Amanda,

The NPS will not be participating in FLM consultation with state's RH Progress Reports due to workloads with state draft RH SIPs and EPA proposals for approval/disapproval of regional haze SIPs.

Thank you,  
Holly Salazer

---

Holly Salazer  
NPS Air Resources Division  
Branch Lead, Policy, Planning and Permit Review  
[Air Resources Division - Home \(sharepoint.com\)](#)

AT

Allen, Tim<tim\_allen@fws.gov>

To: Fritz, Amanda  
Cc: Wholean, Kiernan

...

Thu 10/24/2024 1:12 PM

ⓘ You replied on Thu 10/24/2024 1:34 PM

⚠ This sender tim\_allen@fws.gov is from outside your organization.

Block sender

Start reply with: Thank you so much for the feedback. Thanks for the feedback! Thank you!

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi Amanda,

Thank you for the virtual presentation on Oct 24, 2024. The presentation was informative and sufficient. I do not plan on submitting formal comments to the record.

Thank you,

Tim Allen  
U.S. Fish & Wildlife Service

P

Perron, Ralph - FS, NH<ralph.perron@usda.gov>

To: Fritz, Amanda; Rackauskas, Eric <rackauskas.eric@epa.gov>; +6 others  
Cc: Wholean, Kiernan

...

Thu 10/24/2024 1:33 PM

1 You replied on Thu 10/24/2024 1:35 PM

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**EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.**

Hi Amanda,

Thanks for sharing your overview presentation this afternoon and for the opportunity to review the Draft Connecticut Regional Haze Progress Report for the Second Planning Period.

The one comment I have, from the US Forest Service perspective, which I shared on the Teams call this afternoon, is that Tables 6-1 through 6-6 are inconsistent with the text on page 36, in particular, the emission reductions/increases for MANEVU are not consistent in the Tables and text.

Thanks for continuing cooperative efforts to ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I areas.



Ralph Perron (he/him)

Air Quality Specialist

Forest Service

Eastern Region

cell: 802-222-1444

[ralph.perron@usda.gov](mailto:ralph.perron@usda.gov)



Caring for the land and serving people