



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

1 Congress Street, Suite 1100
BOSTON, MA 02114-2023

July 10, 2008

Jeff Underhill
Air Resources Division
New Hampshire Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Dear Mr. Underhill:

On May 28, 2008, we received your preliminary draft Regional Haze State Implementation Plan (SIP). EPA staff have reviewed this draft and you will find our comments in the Enclosure.

If you have any questions on the enclosed comments, please contact me at 617-918-1047.

Sincerely,

A handwritten signature in cursive script that reads "Anne E. Arnold".

Anne E. Arnold, Manager
Air Quality Planning Unit

Enclosure

cc: Charles Martone, NH DES
Andy Bodnarik, NH DES

Enclosure

EPA'S COMMENTS ON NEW HAMPSHIRE'S PRELIMINARY DRAFT REGIONAL HAZE SIP

The purpose of these comments is to provide the NH DES with some early feedback on their preliminary draft Regional Haze SIP. The focus of these comments is on the New Hampshire specific information stated in the draft. These comments are preliminary and may be amended as more detail is provided.

2.0 Areas Contributing to Regional Haze

1) The fifth paragraph on page 17 discusses the decline in sulfate concentration expected in the Great Gulf and Presidential Dry River Wilderness areas by 2018. The discussion should indicate which modeling results/control strategies are being used to develop these projections.

2.2 States Contributing to Visibility Impairment in New Hampshire's Class I Areas

2) In the discussion of states or regions contributing to visibility impairment at New Hampshire's Class I areas, MANE-VU is noted as contributing 27.83% (per Table 2.2). The next highest contribution is from "Other" at 23.54%. Given the magnitude of this category relative to the total MANE-VU contribution, NH should include some discussion of the components of the "Other" category.

3.2.5 State/Tribe and Federal Land Manager Coordination

3) As noted on page 32, the Regional Haze rule requires a 60 day comment period for Federal Land Managers (FLMs) before the public hearing. While timing may preclude the development of a response to these comments before the hearing, we recommend that any comments submitted by the FLMs be included in the materials provided for the public hearing.

6.3.1 Stationary Point Sources

4) On page 51, regarding Electrical Generating Units (EGUs) emissions inventories, there is discussion of the use of continuous emissions monitoring (CEM) data to develop hourly emissions profiles. Although use of CEM data makes sense given its high degree of accuracy, emissions from EGUs can vary widely from one day to another, and also vary greatly from season to season. How were the CEM hourly emissions profiles determined? NH should note that use of seasonal or annual average profiles may lead to an underestimation of visibility impacts on the worst 20% days. NH should include additional detail on how CEM data was used to develop hourly emission profiles.

6.4 Summary of Emissions Inventories

5) It is not clear why there is such a significant drop in PM₁₀ from area sources between the 2018 BOTW and 2018 most recent modeling (Table 6-3 vs. Table 6-4). NH should provide additional detail on this issue.

9.5.1 BART Determinations and Required Control Levels

6) The attachment which details the analysis for New Hampshire's BART sources has not been provided. EPA needs to review this attachment in order to determine if New Hampshire's BART determinations and required control levels are reasonable. However, we do have some preliminary feedback on the limited information that was provided in main text.

Table 9.2 indicates that the BART emission limit for Newington Station unit NT-1 is "limited to no more than 1.0% sulfur by weight for #6 fuel oil." The MANE-VU BART Workgroup Recommendations DRAFT Presumptive Control Levels (Updated September 7, 2006) for Non-CAIR EGUs is to use 0.3% sulfur content oil. Was this level of control analyzed?

In addition, Table 9.2 indicates a BART control level of 80% control of SO₂ for Merrimack Station and 50% control of SO₂ for Newington Station. Both of these sources are included in the MANE-VU "167 stacks." MANE-VU is requesting 90% control of the 167 stacks. On page 28, New Hampshire states, "NHDES has determined that controlling the latter facility (Newington) to the 90 percent level of the Ask is not reasonable at this time and will seek alternative measures to achieve the equivalent overall reduction in SO₂ emissions." NH should include a discussion of the analysis that led to this determination, as well as more information on the referenced alternative measures.

Furthermore, Tables 9.3 and 9.4 indicate that, for NO_x and PM, respectively, "current controls (ESP, SCR, etc.) are BART." It should be noted that BART requirements must be federally enforceable. Therefore, the BART discussion should reference the specific existing federally enforceable requirements that require these "current controls." Alternatively, if the requirements implementing the current controls are not yet federally enforceable, they must be submitted to EPA as a SIP revision.

11.5 Additional Factors Considered

7) Section 51.308(d)(3)(v) of the Regional Haze rule states, "The States must consider, at a minimum, the following factors in developing its long term strategy:

...

(B) Measures to mitigate the impacts of construction activities;

(C) Emission limitations and schedules for compliance to achieve reasonable progress goals;

...

(E) Smoke management techniques for agriculture and forestry management purposes including plans as currently exist within the state for these purposes."

New Hampshire's SIP should include more detail in these areas.

11.6 - 11.7 New Hampshire's share of Emission Reductions

8) More discussion should be included that connects New Hampshire emissions, and emission reductions, with meeting the reasonable progress goals for the Class I areas that New Hampshire impacts. Also, New Hampshire should discuss how it is meeting its apportionment of emission reductions agreed upon in the regional planning process.