



IN REPLY REFER TO:

United States Department of the Interior
NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225



December 7, 2007

N3615 (2350)

Mr. James E. Sydnor
Air Division Director
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Dear Mr. Sydnor:


On October 1, 2007, the Commonwealth of Virginia submitted a draft implementation plan describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the Commonwealth through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Department of the Interior, National Park Service has received and conducted a substantive review of your proposed Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

As outlined in a letter to each state dated August 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Manager agencies, and we have enclosed comments associated with these priorities. We look forward to your response, as per section 40 CFR 51.308(i)(3). For further information, please contact Holly Salazer of our Northeast Regional Office at (814) 865-3100.

Again, we appreciate the opportunity to work closely with the Commonwealth of Virginia and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,


Christine L. Shaver
Chief, Air Resources Division

Enclosure

**National Park Service Comments Regarding
Virginia Draft Regional Haze Rule State Implementation Plan**

On October 1, 2007, the Commonwealth of Virginia submitted a draft Regional Haze Rule State implementation plan (SIP), pursuant to the requirements codified in federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, National Park Service (NPS). The air program staff of the NPS has conducted a substantive review of the Virginia draft plan, and has provided the comments listed below. We look forward to the Virginia Department of Environmental Quality (VDEQ) response to our comments as per section 40 CFR 51.308(i)(3). For further information regarding these comments, please contact Holly Salazer of our Northeast Regional Office at (814) 865-3100.

Executive Summary

Page ii – in reference to the 21 Class I areas in the Visibility Improvement State and Tribal Association of the Southeast (VISTAS), please indicate that those areas include both national parks and wilderness areas.

Page ii – Suggest adding “Wilderness Area” to James River Face in the last sentence of the 3rd paragraph.

Page ii – 4th paragraph, first sentence, suggest writing out Best Available Retrofit Technology (BART) acronym.

Page viii – Acronyms - Suggest including what state Brigantine Wilderness Area (WA) is located (NJ) for uniformity with other Class I areas listed.

Page ix – Acronyms – Suggest including what state Upper Buffalo WA is located (AR) for uniformity with other Class I areas listed.

Section 1: Introduction

Page 10 – Please check the Visibility Information Exchange Web Site (VIEWS) for any updated Shenandoah National Park (NP) values in Table 2.3-1.

Section 7: Long Term Strategy

7.2.1 Existing Controls

Page 44 – Include the American Electric Power (AEP) consent decree and identify any reductions that may be achieved in Virginia.

Page 44 – Recommend including the states that are affected by the listed Consent Agreements, i.e., location of the units that are affected by the Agreements. With the inclusion of AEP facilities, some may be regionally significant.

7.2.2 Other State Programs

Page 46 – Include where the State agriculture and fire/smoke programs are actually discussed in the SIP (section 7.9.1). Also, it will be important to note whether or not the Commonwealth’s Smoke Management Plan lists Class I areas as sensitive receptors.

7.2.4 Model Results for Uniform Rate of Progress

Page 49 – Figure 7.2.4-1 (and Figure 7.2.4-2), please explain the Method 1 Prediction.

Page 50 – Figure 7.2.4-3 (and Figure 7.2.4-4), recommend including a key for Class I area names.

7.3 International Emissions

Page 53 – Figure 7.3-1, suggest using same format as other figures, separating VISTAS Class I areas from non-VISTA Class I areas.

Page 53-54 – Figure 7.3-2, VDEQ must also remove international emissions from the uniform rate of progress glidepath for an accurate comparison of improvement from removing international emissions from 2018 emissions.

7.4 Relative Contributions

Page 57 – Figures 7.4-1 and 7.4-2, suggest adding a key to understand what figures are trying to say. For example, what is Bio, Antro, BC? Explaining the acronyms will help the reader understand what she is looking at.

Page 58 – Recommend not using the term “the mountain class I areas” when referring to Shenandoah NP and James River Face WA. Because this term can be applied to other Class I areas in the VISTAS region, it can be misleading to the reader when the figures 7.4-1 and 7.4-2 deal only with Shenandoah and James River Face. Or if VDEQ is switching the discussion to all mountain Class I areas in VISTAS, then please explicitly say that, i.e. “The mountain class I areas in VISTAS...”

7.5.4 Emission Sources

Page 63 – Table 7.5.4-3, suggest including a similar table for other Class I areas outside Virginia that Virginia sources may impact. The VDEQ does mention that Virginia sources do impact Class I areas outside Virginia in Section 7.7.3, so it would be helpful to see the tabular information for those areas included here along with the tables for Shenandoah NP and James River Face WA.

7.6. Evaluating the Four Statutory Factors for Specific SO₂ Emissions Sources in Each Area of Influence

Page 66 – Although VISTAS concluded that SO₂ should be the focus for Reasonable Progress for 2018, we believe that this does not preclude looking at NO_x controls. Virginia should look at NO_x controls on its large industrial boilers and processes (e.g., Selective Catalytic Reduction at Westvaco and O-N Minerals). The U.S. Forest Service submitted comments on controlling NO_x from the Westvaco power boilers, and we agree with those comments.

7.7.4 Step 4: Determining Emission Units

Page 69 – Recommend including the reasoning behind the five Class I areas that were chosen to be evaluated.

Page 70-72 – Figures 7.7.4-2, suggest adding a figure showing sources outside Virginia with >1% contribution to Shenandoah NP and James River Face WA for a complete picture (i.e., looking within Virginia and outside Virginia).

Page 72 – Table 7.7.5.1-1, recommend clarifying title of table to indicate the listed Electric Generating Units (EGUs) are in Virginia. As above, recommend including table of EGUs outside Virginia that affect Shenandoah NP and James River Face WA.

7.8.3. Determination of BART Requirements for Subject-to-BART Sources

Page 80 – The discussion of sources subject to BART should include VA's analyses of the BART proposals, as well as the final BART determination, not just the BART proposals from the sources. Please include final determination information in Table 7.8.3-1. Also, NPS may submit follow-up comments after VDEQ completes its BART analysis of the O-N Minerals facility.

7.9.1 Smoke Management

Page 81 – VDEQ should at a minimum include a brief summary of the information on the website and whether or not it agrees with the Department of Forestry's approach to smoke management. In addition, it is important that Class I areas are included as sensitive receptors in a Smoke Management Plan.

Section 8: Reasonable Progress Goals

Page 85 – Please add a discussion of other programs that will balance growth or relocation of emissions with the regional haze goals. For example, VDEQ should include a discussion of the Prevention of Significant Deterioration (PSD)/New Source Review (NSR) program as a tool for considering emissions growth and its effect on the regional haze plan. The PSD/NSR program is important to Reasonable Progress Goals, because PSD growth needs to be accounted for in future projection emission inventories. The PSD program is one of the other regulatory programs that may help VDEQ meet its Reasonable Progress Goals.

Section 9: Monitoring Strategy

We agree that the VDEQ has a responsibility to conduct monitoring and assessments as part of an ongoing progress review towards the goals set in the SIP, as well as for informing future SIP revision and planning activities required under the national Regional Haze Rule. We also agree that the most efficient way to provide for regional haze monitoring is through continued participation with the Interagency Monitoring of Protected Visual Environments (IMPROVE) cooperative. However, we also realize that the future is uncertain regarding continued funding for individual monitoring sites under the IMPROVE program. In the absence of IMPROVE monitoring, the SIP mentions that the VDEQ will consult with the EPA and relevant Federal Land Managers to develop an alternative approach for meeting the tracking goal. We welcome the opportunity to be involved in those discussions.

Section 10.0 Interstate Consultation

Page 89 – Suggest changing “responsible states” to “respective states” in first line of page 89.

Page 89 – Recommend listing the neighboring states still in the process of evaluating BART, or make it clear if they are VISTAS states. Or Mid-Atlantic Northeastern Visibility Union (MANE-VU) states? Or Midwest Regional Planning Organization (MWRPO) states? This will allow the reader to better understand the consultation process both state-to-state, as well as between RPOs.

Page 89 – Recommend some narrative on the exchange between VA and NH and NJ and North Carolina, i.e., summarize request and response that is found in Appendix J.

In addition, we believe it is important to discuss the inter-RPO consultation that occurred in July and August 2007 between the VISTAS and MANE-VU RPOs. It is important to address the discussions and requests that occurred during and subsequent to these consultations. Specifically, we would like to see VDEQ's response to the MANE-VU "Request for Course of Action," submitted by MANE-VU to the VISTAS states on August 7, 2007, in Atlanta, Georgia. Appendix J does not currently include any information on the August 7th meeting, nor does it include this request. As we understand it, VISTAS prepared a response to MANE-VU, and we feel it is important for VDEQ to not only include this response but also its own conclusions regarding this "Request for Course of Action." We believe such a conclusion should be included in the SIP narrative and not in Appendix J.

We would like to note the four actions requested by MANE-VU in the "Request for Course of Action":

1. timely implementation of BART
2. the 167 stacks identified by MANE-VU, as "reasonably anticipated to cause or contribute to visibility impairment in MANE-VU Class I areas,"
3. an additional 28% reduction in non-EGU SO₂ emissions, and
4. discussion of any other measures to reduce SO₂ and NO_x emissions from coal-burning facilities by the year 2018.

By providing Virginia's conclusions to these four requested actions in Section 10.0 of the Regional Haze SIP, Virginia will be appropriately addressing issues raised during the consultation process, both within and outside the VISTAS RPO, as required by the Regional Haze Rule.

Section 11.0 Comprehensive Periodic Implementation Plan Revisions

Page 90 – On-going FLM consultation, recommend being more specific beyond annual discussion of implementation, monitoring data and VIEWS data. Will the FLMs be involved early in the process for the 5-year Progress Report on reasonable progress? Will we have an opportunity to comment on the report before it is finalized? Same questions apply to next SIP submittal at 2018.