



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



October 30, 2007

N3615 (2350)

Mr. William Frederick Durham
Deputy Director
Assistant Director, Planning
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, West Virginia 25304

Dear Mr. Durham:

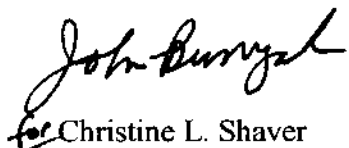
On September 21, 2007, the State of West Virginia submitted a draft implementation plan describing your proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the State through the initial evaluation, development, 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 Wildernesses 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 State of West Virginia and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

A handwritten signature in black ink, appearing to read "John Burryal". The signature is written in a cursive style with a large initial "J".

~~for~~ Christine L. Shaver
Chief, Air Resources Division

Enclosure

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

On September 21, 2007, the State of West 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 West Virginia draft plan, and has provided the comments listed below. We look forward to the West Virginia Division of Air Quality's (WVDAQ) response 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.

General Comments:

1. Page 46, Section 7.2, we recommend identifying the state in which the Consent Agreements were filed.
2. Page 48, Section 7.2, please clarify significance of Early Action Compacts (EAC) to the state's proposed RH program. The draft SIP states the WVDAQ encourages emission reductions through EACs stating that such emissions may yield quantifiable visibility benefits. However, the paragraph concludes such reductions were not included in modeling because essentially the reductions will likely have little impact on visibility. Which one is it?
3. Page 60, Section 7.3, figure 7.3-3 presents results on projected visibility glide slope for Dolly Sods WV. One data point is offered to represent a projection of haziness if international effects were removed. Providing this data is misleading without removing an appropriate amount of international contribution from the 2064 estimate of natural condition. Please remove an appropriate international contribution from the natural condition and present a new glide slope line.
4. Page 61-62, Section 7.4, Figure 7.4-1 illustrates neighboring state contributions to visibility degradation at Dolly Sods WA on the 20% worst days. Please provide additional discussion in the main body of the SIP discussing the consultation with these States to address those contributions. Please see also comments #14-17 below regarding Section 10.0.
5. Page 62, Section 7.5, recommend including maps, tables and discussion for additional Class I areas (e.g., Shenandoah National Park) impacted by WV sources in this section. Such a discussion is referenced in Appendix H, but we recommend adding this information to the main body of the SIP.
6. Page 68, Section 7.5, Table 7.5.-1 highlights the neighboring States sulfur dioxide point source contribution to visibility impairment in WV Class I areas. Please provide additional discussion describing the consultation with these States to address their contributions. Please also see comments #14-16 below regarding state-to-state consultations.

7. Page 71, Section 7.5, we would like to see a list of the sources located within the Area of Influence (AOI) of each Class I area in West Virginia. A summary list of these sources should be included in the SIP narrative, much like the identification and listing of BART eligible sources. Providing these sources by name will add clarity to the reasonable progress discussion, especially with respect to the cost effectiveness of controls for the non-EGU sources. In addition, the State mentions it used lists of individual sources to see if other source categories were major contributors to SO₂ emissions in the Area of Influence, but no conclusions were provided in the narrative.
8. Page 72, Section 7.6, please provide more information regarding VISTAS modifications to EPA's AirControlNET database.
9. Page 76-77, Sec 7.7, and Page 86, Section 7.8.c, we compliment West Virginia on looking at reducing sulfur dioxide at Capitol Cement as part of their reasonable progress effort, but think the State should also evaluate potential NO_x reductions (e.g., by application of SNCR) there as well.
10. Page 84, Section 7.8, correct reference to chart 7.8.b-3 in text. Paragraph should read, "The facilities with BART-Eligible units found to be subject to BART are shown in Table 7.8.b-3," not Table 7.8.b-1
11. Page 86, Section 7.8.c, regarding Dominion-Mt. Storm facility, we recognize that the facility is well-controlled and would like to see this level of control reflected in the pending Title V permit. Information provided by WVDAQ indicates that this facility is capable of meeting a limit on filterable PM₁₀ emissions of 0.010 lb/mmBtu. Considering that the BART analyses were based upon the premise of this high-degree of control, it seems that, for consistency, the resulting permit limit should reflect the degree of control used in the analyses (with some safety margin). Since the NSPS for EGUs is 0.015 lb/mmBtu, we suggest that this would provide an adequate margin of safety while insuring that the control equipment is properly maintained and operated in the manner assumed by the analyses.
12. Page 87, Section 7.9, please clarify language as to what the State is planning in terms of addressing prescribed fire in this planning period. Were emissions from prescribed burns considered in VISTAS modeling? Will future prescribed burns be significant enough to be addressed in each planning phase?
13. Page 86, Section 7.9, please add a discussion of other programs that will balance growth or relocation of emissions and the regional haze goals. For example, WV DAQ should include a discussion of the Prevention of Significant Deterioration/New Source Review program as a tool for considering emissions growth and its effect on the regional haze plan.

14. Page 93, Section 10.0, please identify what Class I areas West Virginia considered when evaluating if the state's emissions impacted other Class I areas in neighboring states. Also please include any consultations West Virginia has had with those Class I area states. As mentioned in Comment #5 above, including information in Appendix H directly into the main body of the SIP would be helpful to the discussion in Section 10.0 (as well as Section 7.5).
15. Page 93, Section 10.0, it would be helpful to again see information discussing which states were contributors to visibility impairment and a discussion describing the consultation with these States to address their contributions (similar to Section 7.4 or 7.5 or reference those sections). No reference is made to communications with states in MWRPO, which were deemed significant in Section 7.4 and Section 7.5 above.
16. Page 93, Section 10.0, we recommend that the State update the discussion of consultation with MANE-VU states that may have occurred this past summer. It is important to acknowledge that the State, although not agreeing with the MANE-VU assertions, is willing to participate in the consultation process.
17. Page 94, Section 10.0, this one paragraph regarding Brigantine National Wildlife Refuge is the only discussion of impacts from West Virginia emissions on a Class I area outside state boundaries. As mentioned above, we recommend a discussion of WV emission sources on other Class I areas (e.g., Shenandoah National Park).
18. Page 95, Section 11.0, in accordance with 40 CFR 51.308(i)(4), please provide specific procedures for assuring ongoing FLM-State consultation on implementation of the provisions of the SIP, the development of the 5-year review and work on the SIP revision due in 2017. Annual discussions of the implementation plan may not be sufficient to meet this ongoing consultation requirement.