



IN REPLY REFER TO

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



January 17, 2008

N3615 (2350)

Ms. Catherine Fitzsimmons
Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Dear Ms. Fitzsimmons:

On November 26, 2007, the State of Iowa submitted a draft implementation plan describing its proposal to improve air quality regional haze impacts at mandatory Federal 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 our 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 State Implementation Plan (SIP) revisions to address Regional Haze Rule requirements under the federal regulations 40 CFR 51.308(i)(2). We have coordinated our comments with the U.S. Fish and Wildlife Service, Air Quality Branch since they also manage several mandatory Federal class I areas.

We complement the state on its draft SIP which we found to be clear and well-organized. The document and accompanying materials address the eight major topics we noted as important for our review in our August, 2006 letters sent to all States. While we see no major problems with the draft SIP, we provide comments in the enclosure which we request the state to address before submitting final SIP documentation to the U.S. Environmental Protection Agency (EPA). Please note, however, that only the EPA can make a final determination about the document's completeness, and therefore only the EPA has the ability to approve a SIP revision.

We look forward to your response, as per section 40 CFR 51.308(i)(3). For further information, please contact Bruce Polkowsky at (303) 987-6944.

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

Sincerely,


for Christine L. Shaver
Chief, Air Resources Division

Enclosure

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

On November 26, 2007, the State of Iowa 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, in coordination with U.S. Fish and Wildlife Service, Air Quality Branch staff, has conducted a substantive review of the Iowa draft plan, and has provided the comments listed below. We applaud the Iowa Department of Natural Resources (IDNR) for developing a SIP that is responsive to the key policy areas that we identified as important in our August 1, 2006, letter. We particularly appreciate the inclusion of the emissions summary, modeling approach and model performance in the body of the SIP narrative. We offer the following comments in the spirit of cooperation to improve on the items already contained in the draft SIP. In addition, we concur with the comments submitted to the State by the U.S. Department of Agriculture, Superior National Forest on December 20, 2007. We look forward to the State's response as per section 40 CFR 51.308(i)(3). For further information regarding these comments, please contact Bruce Polkowsky at (303) 987-6944.

Baseline, Natural Condition, and Uniform Rate

On page 18, the SIP contains a discussion regarding "Consultation regarding the visibility metrics" and concludes that IDNR coordinated with States and Tribes containing mandatory Federal Class I areas. However, Iowa should confirm that it accepts the values developed through national consensus, or any modifications of those national data done by States for specific mandatory Federal class I areas within those States.

Emissions Inventories

On pages 22-24, the SIP contains a discussion of the baseline (2002) and projected (2018) emissions inventories for pollutants which affect visibility. The SIP notes that there are major uncertainties regarding sulfur dioxide (SO₂) emissions from electric generating units (EGU) in 2018. We are concerned that even after the State's modifications, the SO₂ emissions from the EGU sector is forecast to increase. As noted below in our comments on Reasonable Progress and its associated Long Term Strategy, this increase appears inconsistent with Iowa accomplishing its "fair share" toward reducing sulfate impacts at mandatory Federal Class I areas in Minnesota. On page 47, the SIP contains a discussion of various emissions projects for EGU based on the Integrated Planning Model (IPM). It is unclear whether the State is adopting the IPM 3.0 run as its best projection for future emissions from EGU. If so, the material on pages 22-23 would need to be updated. Given these uncertainties in the future projections, the SIP should explicitly address actions the state will take in its five-year review to address any changes from projected emissions reductions between 2002 and 2018, specifically for the EGU sector. In addition, the SIP should explain how the State will evaluate future emissions under its new source review (NSR) and prevention of significant deterioration (PSD) programs in light of overall emissions reduction goals of the regional haze program.

Reasonable Progress Goals and Long Term Strategy (including BART)

Given the limited change in emissions projected between 2002 and 2018, IDNR should have further explored specific strategies on all sources including BART / Clean Air Interstate Rule (CAIR) EGU sources. Such an examination may indicate which existing EGU facilities would be most effective in supporting neighboring States' visibility goals and provide incentive for those facilities subject to CAIR to be a priority for installation of control equipment.

A reasonable progress assessment should review all sources not just EGU. The work done by Alpine Geophysics, noted on page 36, listed sources with associated costs that are below those quoted by IDNR. IDNR quotes industry issues with the Alpine Geophysics work, but does not supply specific information to support the industry claims.

IDNR should explore specific sources within an "area of influence" for at least the Minnesota mandatory Federal Class I areas for any cost-effective controls for sulfur dioxide and nitrogen oxides emissions based on dollars spent per ton reduced. Costs in the range of CAIR cost projections should be seriously considered as "reasonable" and made part of the regional haze SIP.

On page 39, the SIP summarizes Iowa's percentage contribution to visibility impairment at the four mandatory Federal class I areas of the Midwest Regional Planning Organization. Iowa's percent contribution increases between 2002 and 2018 at all of these areas which means that Iowa's emissions management plan is not keeping pace with its neighboring states regarding changes in emissions affecting the mandatory Federal class I areas. In addition, this discussion focuses on the worst twenty percent visibility days, and a similar review should be evaluated for the best visibility days to assure that Iowa's emissions changes are not disproportionately affecting the cleaner days in the future.

Verification and Contingencies

The SIP relies almost completely on CAIR implementation for addressing Iowa's impacts on visibility at mandatory Federal Class I areas. Yet, the precise outcome of CAIR implementation is unknown. The draft SIP indicates that existing CAIR sources plus expected new generation facilities could actually increase the State's SO₂ emissions between 2002 and 2018 from the EGU sector. To address this uncertainty, the State should address the overall emissions reductions expected from existing EGU subject to CAIR between 2002 and 2018 and commit to re-evaluating its reasonable progress strategy at the five-year review point in 2013. If EGU emissions projections, done as part of the 5-year review, show that those facilities are not likely to meet the SIP's current 2018 projections, the State should examine additional control requirements and revise the SIP at the 5-year review point. In addition, the SIP should address the link between permitting of new EGU sources under NSR / PSD with the overall goal of reasonable progress in this SIP.

visibility (BWCA). The Iowa SIP claims that Iowa sources are not significant contributors to the twenty percent worst visibility days at any Class I area. It may be that Minnesota's conclusion is based on a ranking of impacts developed from regional planning organization assessment efforts as well as additional analyses conducted by the State and is not based on absolute magnitude of impacts. If Iowa has consulted with Minnesota regarding its ranking assessment of Iowa's effect and Minnesota agrees with Iowa's conclusion that Iowa's plan, as drafted, has included all measures necessary to obtain its share of emissions reductions needed to meet reasonable progress goals for VOYA and BWCA, please include a summary of those consultations in the SIP.