



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



N3615 (2350)

February 22, 2012

Pamela Blakley, Chief
Control Strategies Section
Air Programs Branch (AR-18J)
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

EPA Docket ID: EPA-R05-OAR-2011-0329

Dear Ms. Blakley:

The National Park Service (NPS) has reviewed the Environmental Protection Agency's (EPA's) proposed "Approval and Promulgation of Air Quality Implementation Plans; Minnesota; Regional Haze." Concurrently, we have just completed our review of Minnesota's proposed Supplement to the Regional Haze State Implementation Plan. We are submitting to EPA the enclosed comments that we submitted to Minnesota on February 2, 2012, because we have the same concerns with EPA's proposed approval of Minnesota's plan.

We disagree with EPA's conclusion that emissions reductions proposed under the Cross State Air Pollution Rule will provide greater visibility improvement at Class I areas in Minnesota than would occur under source-specific application of Best Available Retrofit Technology (BART) for electric generating units (EGU) in the State. We recommend that the source-specific BART analyses be applied for EGU in Minnesota rather than relying on the Cross State Air Pollution Rule for emissions reductions that are uncertain due to the current Stay and upcoming District Court review of the Rule.

We do not agree with EPA's proposal to approve the proposed emissions limits for the Minnesota taconite plants that are subject to BART. We have consistently recommended that the taconite plants be required to meet lower emissions limits than proposed by Minnesota (see our enclosed September 2009 comments to Minnesota). Subsequent to proposing to approve the Minnesota plan, on February 10, 2012, EPA Region 5 sent a letter to Minnesota citing data from U. S. Steel's Minntac facility that demonstrates that low NO_x burners are economically achieving 70 percent reductions of nitrogen oxide (NO_x) at the facility. We encourage Minnesota and EPA Region 5 to apply this data to

require the Minnesota taconite plants to meet lower emissions limits that reflect the capabilities of the available technology.

We appreciate the opportunity to work closely with EPA Region 5 and the Minnesota Department of Pollution Control and EPA Region 5 to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Don Shepherd at (303) 969-2075.

Sincerely,



Susan Johnson
Acting Chief, Policy, Planning and Permit Review Branch

Enclosures

cc:

David Thornton
Assistant Commissioner, Air Policy
Minnesota Pollution Control Agency
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