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

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

December 20, 2010

N3615 (2350)

Jeffrey T. Underhill, Chief
Atmospheric Science & Analysis
NHDES Air Resources Division
29 Hazen Drive; PO Box 95
Concord, New Hampshire 03302-0095

Dear Mr. Underhill:

In June 2009, the National Park Service provided comments on New Hampshire Department of Environmental Services' (NHDES) determination of Best Available Retrofit Technology (BART) for Public Service New Hampshire's (PSNH) Merrimack Station Unit MK2. In January 2010, NHDES submitted a final State Implementation Plan for regional haze and BART determination for PSNH Merrimack Station Unit MK2. In February 2010, the Environmental Protection Agency (EPA) Region 1 determined that NHDES's BART determination for Merrimack Station was incomplete and returned that portion of the SIP to NHDES to be revised to meet the BART requirements. NHDES provided notice to the National Park Service on November 22, 2010, that the revised SIP was available for public comment. Our comments here are provided in consultation with the Fish and Wildlife Service and are in response to the revised BART determination for PSNH Merrimack Station.

We disagree with the methods used by NHDES to demonstrate the visibility response to BART controls at PSNH Merrimack Station. In the CALPUFF model, natural background visibility conditions are to be used to evaluate the visibility impacts from the BART source at Class I receptors. Natural background visibility conditions are to be used with current emissions from the source and again when comparing visibility benefits of alternative emissions control options. The Federal Land Managers (FLMs) have recommended to the northeastern states that since only one year of meteorological data is being modeled, the 20% best natural background visibility conditions should be used in the analysis. The maximum impact value at the Class I area receptors should be used to determine the visibility impact of the source before control and assuming control installation. If three years of meteorological data are processed with observational data, the FLMs have recommended that the annual average of the natural background visibility conditions can be used in the comparison with the 8th highest impact value in each year to

determine the source's visibility impact. NHDES has incorrectly used the 20% worst days from current visibility conditions to evaluate the benefits of controls at Merrimack Station. Instead, the 20% best natural background visibility condition and the maximum visibility impact on any day should be used to evaluate the benefits of controls. NHDES' approach is not appropriate and does not meet the BART modeling guidance. Since the maximum impact of the source may actually be on a good visibility day, and since the objective is to compare the source impact to clean natural background visibility conditions, the analysis of the visibility impact of controls at Merrimack Station is not acceptable and needs to be redone.

We appreciate the opportunity to work closely with NHDES on the development and review of your plans to improve visibility in our Class I national parks and wilderness areas. For further information regarding our comments, please contact Tim Allen of Fish and Wildlife Service at (303) 914-3802 or Pat Brewer of my staff at (303) 969-2153.

Sincerely,

John Bunyak
Acting Chief, Air Resources Division

cc: Karla McManus
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