Mid-Atlantic/Northeast Visibility Union
MANE-VU

Reducing Regional Haze for Improved Visibility and Health

Members
Connecticut
Delaware
District of Columbia
Maine
Maryland
Massachusetts
New Hampshire
New Jersey
New York
Pennsylvania
Penobscot Indian Nation
Rhode Island
St. Regis Mohawk Tribe
Vermont

Nonvoting Members
U.S. Environmental Protection Agency
National Park Service
U.S. Fish and Wildlife Service
U.S. Forest Service

STATEMENT OF THE MID-ATLANTIC/NORTHEAST VISIBILITY UNION (MANE-VU) CONCERNING A COURSE OF ACTION WITHIN MANE-VU TOWARD ASSURING REASONABLE PROGRESS

The federal Clean Air Act and Regional Haze rule require States that are reasonably anticipated to cause or contribute to impairment of visibility in mandatory Class I Federal areas to implement reasonable measures to reduce visibility impairment within the national parks and wilderness areas designated as mandatory Class I Federal areas. Most pollutants that affect visibility also cause unhealthy concentrations of ozone and fine particles. In order to assure protection of public health and the environment, any additional air pollutant emission reduction measures necessary to meet the 2018 reasonable progress goal for regional haze should be implemented as soon as practicable .

To address the impact on mandatory Class I Federal areas within the MANE-VU region, the Mid-Atlantic and Northeast States will pursue a coordinated course of action designed to assure reasonable progress toward preventing any future, and remedying any existing impairment of visibility in mandatory Class I Federal areas and to leverage the multi-pollutant benefits that such measures may provide for the protection of public health and the environment. This course of action includes pursuing the adoption and implementation of the following "emission management" strategies, as appropriate and necessary:

- timely implementation of BART requirements; and

- a low sulfur fuel oil strategy in the inner zone States (New Jersey, New York, Delaware and Pennsylvania, or portions thereof) to reduce the sulfur content of: distillate oil to 0.05% sulfur by weight (500 ppm) by no later than 2012, of #4 residual oil to 0.25% sulfur by weight by no later than 2012, of #6 residual oil to 0.3 – 0.5% sulfur by weight by no later than 2012, and to further reduce the sulfur content of distillate oil to 15 ppm by 2016; and

- a low sulfur fuel oil strategy in the outer zone States (the remainder of the MANE-VU region) to reduce the sulfur content of distillate oil to 0.05% sulfur by weight (500 ppm) by no later than 2014, of #4 residual oil to 0.25 – 0.5% sulfur by weight by no later than 2018, and of #6 residual oil to no greater than 0.5 % sulfur by weight by no later than

MANE-VU Class I Areas

ACADIA NATIONAL PARK ME

BRIGANTINE WILDERNESS NJ

GREAT GULF WILDERNESS NH

LYE BROOK WILDERNESS VT

MOOSEHORN WILDERNESS ME

PRESIDENTIAL RANGE DRY RIVER WILDERNESS NH

ROOSEVELT CAMPOBELLO INTERNATIONAL PARK ME/NB, CANADA

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2018, and to further reduce the sulfur content of distillate oil to 15 ppm by 2018, depending on supply availability; and

- A 90% or greater reduction in sulfur dioxide (SO_2) emissions from each of the electric generating unit (EGU) stacks identified by MANE-VU (Attachment 1- comprising a total of 167 stacks – dated June 20, 2007) as reasonably anticipated to cause or contribute to impairment of visibility in each mandatory Class I Federal area in the MANE-VU region. If it is infeasible to achieve that level of reduction from a unit, alternative measures will be pursued in such State; and

- continued evaluation of other control measures including energy efficiency, alternative clean fuels, and other measures to reduce SO_2 and nitrogen oxide (NOx) emissions from all coal-burning facilities by 2018 and new source performance standards for wood combustion. These measures and other measures identified will be evaluated during the consultation process to determine if they are reasonable and cost-effective.

This long-term strategy to reduce and prevent regional haze will allow each state up to 10 years to pursue adoption and implementation of reasonable and cost-effective NOx and SO_2 control measures.

Adopted by the MANE-VU States and Tribes on 20 June 2007

David Littell, Commissioner – Maine Dept. of Environmental Protection
Chair

TOP ELECTRIC GENERATING EMISSION POINTS CONTRIBUTING TO VISIBILITY IMPAIRMENT IN MANE-VU - MODELED BY BOTH VTDEC AND MM5

Row number	CEMS Unit	ORIS ID	Acadia MM5	Acadia VTDEC	Brig MM5	Brig VTDEC	Lye MM5	Lye VTDEC	MM5 2002 SO2 TPY	VTDEC 2002 SO2 TPY		Plant Name	Plant Type	State Name	State Code
1	D005935	593			90	54			2,138	2,136	1	EDGE MOOR	O/G Steam	Delaware	10
2	D005941	594				95				3,742	2	INDIAN RIVER	Coal Steam	Delaware	10
3	D005942	594				74				3,760	2	INDIAN RIVER	Coal Steam	Delaware	10
4	D005943	594			84	44			4,686	4,682	2	INDIAN RIVER	Coal Steam	Delaware	10
5	D005944	594			69	21			7,390	7,384	2	INDIAN RIVER	Coal Steam	Delaware	10
6	D007031LR	703	79			86		75	38,520	38,486	3	BOWEN	Coal Steam	Georgia	13
7	D007032LR	703	72		89		61	68	37,289	37,256	3	BOWEN	Coal Steam	Georgia	13
8	D007033LR	703	71	99	74	64	63	94	43,067	43,029	3	BOWEN	Coal Steam	Georgia	13
9	D007034LR	703	69	95	86	58	60	89	41,010	40,974	3	BOWEN	Coal Steam	Georgia	13
10	D00709C02	709		84		75	89	71	47,591	47,549	4	HARLLEE BRANCH	Coal Steam	Georgia	13
11	D00861C01	861	28	96		65	46	62	42,355	42,318	5	COFFEEN	Coal Steam	Illinois	17
12	D010011	1001			53				28,876	28,851	6	CAYUGA	Coal Steam	Indiana	18
13	D010012	1001	95		46	68			26,016	25,992	6	CAYUGA	Coal Steam	Indiana	18
14	D00983C01	983					52		19,922		7	CLIFTY CREEK	Coal Steam	Indiana	18
15	D00983C02	983					54		18,131		7	CLIFTY CREEK	Coal Steam	Indiana	18
16	D0099070	990		55	100	70		37	29,801	29,774	8	ELMER W STOUT	O/G Steam	Indiana	18
17	D06113C03	6113	30	48	14	43	22	41	71,182	71,119	9	GIBSON	Coal Steam	Indiana	18
18	D06113C04	6113	44	70	97	83	73	83	27,848	27,823	9	GIBSON	Coal Steam	Indiana	18
19	D01008C01	1008			73		100	47	24,109	24,087	10	R GALLAGHER	Coal Steam	Indiana	18
20	D01008C02	1008			98			55	23,849	23,828	10	R GALLAGHER	Coal Steam	Indiana	18
21	D06166C02	6166	62	44	30	81	33	57	51,708	51,663	11	ROCKPORT	Coal Steam	Indiana	18
22	D00988C03	988						77		15,946	12	TANNERS CREEK	Coal Steam	Indiana	18
23	D00988U4	988	14	29	52	34	7	19	45,062	45,022	12	TANNERS CREEK	Coal Steam	Indiana	18
24	D01010C05	1010	43	32	12	28	31	17	60,747	60,693	13	WABASH RIVER	Coal Steam	Indiana	18
25	D067054	6705	34	60	34		44	73	40,118	40,082	14	WARRICK	Coal Steam	Indiana	18
26	D06705C02	6705	92		75		96		27,895		14	WARRICK	Coal Steam	Indiana	18
27	D01353C02	1353	38	30	15	26	85	29	41,545	41,508	15	BIG SANDY	Coal Steam	Kentucky	21
28	D01384CS1	1384	22				58		21,837	21,817	16	COOPER	Coal Steam	Kentucky	21
29	D01355C03	1355	21		51	99	68	52	38,104	38,070	17	E W BROWN	Coal Steam	Kentucky	21
30	D060182	6018	83				39		12,083		18	EAST BEND	Coal Steam	Kentucky	21
31	D01356C02	1356	93	71		88	50	59	25,646	25,623	19	GHENT	Coal Steam	Kentucky	21
32	D060411	6041	61						18,375		20	H L SPURLOCK	Coal Steam	Kentucky	21
33	D060412	6041	53		91			98	20,491	20,473	20	H L SPURLOCK	Coal Steam	Kentucky	21
34	D013644	1364			81				7,185		21	MILL CREEK	Coal Steam	Kentucky	21
35	D013782	1378					87		20,245		22	PARADISE	Coal Steam	Kentucky	21

Notes:
Plants in Red are added as a result of MM5 met modeling.
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MM5 by ERM for Maryland

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Row number	CEMS Unit	ORIS ID	Acadia MM5	Acadia VTDEC	Brig MM5	Brig VTDEC	Lye MM5	Lye VTDEC	MM5 2002 S02 TPY	VTDEC 2002 SO2 TPY		Plant Name	Plant Type	State Name	State Code
36	D013783	1378	76	100	11	84	55	42	46,701	46,660	22	PARADISE	Coal Steam	Kentucky	21
37	D015074	1507	78						1,170		23	WILLIAM F WYMAN	O/G Steam	Maine	23
38	D006021	602	90		38			100	20,014	19,996	24	BRANDON SHORES	Coal Steam	Maryland	24
39	D006022	602	99		29			99	19,280	19,263	24	BRANDON SHORES	Coal Steam	Maryland	24
40	D015521	1552			63				17,782	17,767	25	C P CRANE	Coal Steam	Maryland	24
41	D015522	1552			68				14,274	14,262	25	C P CRANE	Coal Steam	Maryland	24
42	D01571CE2	1571	42	47	1	4	20	28	48,566	48,522	26	CHALK POINT	Coal Steam	Maryland	24
43	D01572C23	1572	73	79	47	45	69	32	32,188	32,159	27	DICKERSON	Coal Steam	Maryland	24
44	D015543	1554			77				10,084	10,075	28	HERBERT A WAGNER	O/G Steam	Maryland	24
45	D015731	1573	67	50	16	12	56	38	36,823	36,790	29	MORGANTOWN	Coal Steam	Maryland	24
46	D015732	1573	59	53	10	13	51	39	30,788	30,761	29	MORGANTOWN	Coal Steam	Maryland	24
47	D016191	1619	37	80					9,252	9,244	30	BRAYTON POINT	Coal Steam	Massachusetts	25
48	D016192	1619	35	66					8,889	8,881	30	BRAYTON POINT	Coal Steam	Massachusetts	25
49	D016193	1619	4	14	65	56	79		19,325	19,308	30	BRAYTON POINT	Coal Steam	Massachusetts	25
50	D015991	1599	5	36			65		13,014	13,002	31	CANAL	O/G Steam	Massachusetts	25
51	D015992	1599	7	27			74		8,980	8,971	31	CANAL	O/G Steam	Massachusetts	25
52	D016061	1606						48		5,249	32	MOUNT TOM	Coal Steam	Massachusetts	25
53	D016261	1626	85						3,430		33	SALEM HARBOR	Coal Steam	Massachusetts	25
54	D016263	1626	91	78					4,971	4,966	33	SALEM HARBOR	Coal Steam	Massachusetts	25
55	D016264	1626	32	25					2,880	2,878	33	SALEM HARBOR	O/G Steam	Massachusetts	25
56	D016138	1613	94						4,376		34	SOMERSET	Coal Steam	Massachusetts	25
57	D01702C09	1702						96		4,565	35	DAN E KARN	Coal Steam	Michigan	26
58	D01733C12	1733	49	24	80	80	45	22	46,081	46,040	36	MONROE	Coal Steam	Michigan	26
59	D01733C34	1733	27	26		76	26	27	39,362	39,327	36	MONROE	Coal Steam	Michigan	26
60	D017437	1743		91						15,805	37	ST CLAIR	Coal Steam	Michigan	26
61	D017459A	1745					76	61	18,341	18,324	38	TRENTON CHANNEL	Coal Steam	Michigan	26
62	D023641	2364	2	57					9,356	9,348	39	MERRIMACK	Coal Steam	New Hampshire	33
63	D023642	2364	1	17	99		28	87	19,453	19,435	39	MERRIMACK	Coal Steam	New Hampshire	33
64	D080021	8002	45	74					5,033	5,028	40	NEWINGTON	O/G Steam	New Hampshire	33
65	D023781	2378		81	2	15			9,747	9,738	41	B L ENGLAND	Coal Steam	New Jersey	34
66	D024032	2403	63	97	25	50	40	44	18,785	18,768	42	HUDSON	O/G Steam	New Jersey	34
67	D024081	2408			95				8,076		43	MERCER	Coal Steam	New Jersey	34
68	D024082	2408			60				5,675		43	MERCER	Coal Steam	New Jersey	34
69	D02549C01	2549		64	41		42	72	25,343	25,320	44	C R HUNTLEY	Coal Steam	New York	36
70	D02549C02	2549					99		12,317		44	C R HUNTLEY	Coal Steam	New York	36
71	D024804	2480					71		7,720		45	DANSKAMMER	O/G Steam	New York	36

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72	D02554C03	2554	33	51	62		27	51	30,151	30,125	46	DUNKIRK	Coal Steam	New York	36
73	D02526C03	2526					78		14,929		47	WESTOVER	Coal Steam	New York	36
74	D025276	2527					80		12,650		48	GREENIDGE	Coal Steam	New York	36
75	D025163	2516			96				7,359		49	NORTHPORT	O/G Steam	New York	36
76	D025945	2594		76						1,747	50	OSWEGO	O/G Steam	New York	36
77	D02642CS2	2642					91		14,086		51	ROCHESTER 7	Coal Steam	New York	36
78	D080061	8006						93		3,817	52	ROSETON	O/G Steam	New York	36
79	D080062	8006						88		2,840	52	ROSETON	O/G Steam	New York	36
80	D080421	8042	13	12	18	5	10	34	57,820	57,769	53	BELEWS CREEK	Coal Steam	North Carolina	37
81	D080422	8042	23	15	32	10	15	49	45,296	45,256	53	BELEWS CREEK	Coal Steam	North Carolina	37
82	D027215	2721	98	45	87	39	97	85	19,145	19,128	54	CLIFFSIDE	Coal Steam	North Carolina	37
83	D027133	2713		61						14,460	55	L V SUTTON	Coal Steam	North Carolina	37
84	D027093	2709				97				9,390	56	LEE	Coal Steam	North Carolina	37
85	D027273	2727	100	40		48	75	84	26,329	26,305	57	MARSHALL	Coal Steam	North Carolina	37
86	D027274	2727	89	39	83	51	66	82	27,308	27,284	57	MARSHALL	Coal Steam	North Carolina	37
87	D06250C05	6250	60	59		35	37		27,395	27,371	58	MAYO	Coal Steam	North Carolina	37
88	D027121	2712				59			12,031	12,020	59	ROXBORO	Coal Steam	North Carolina	37
89	D027122	2712	82	41	54	23	94		29,337	29,310	59	ROXBORO	Coal Steam	North Carolina	37
90	D02712C03	2712	56	37	57	24	21	78	30,776	30,749	59	ROXBORO	Coal Steam	North Carolina	37
91	D02712C04	2712	88	72		47	47		22,962	22,941	59	ROXBORO	Coal Steam	North Carolina	37
92	D0283612	2836	55	20	48	89	29	35	41,432	41,395	60	AVON LAKE	Coal Steam	Ohio	39
93	D028281	2828	29	9	31	30	24	8	37,307	37,274	61	CARDINAL	Coal Steam	Ohio	39
94	D028282	2828						56	20,598	20,580	61	CARDINAL	Coal Steam	Ohio	39
95	D028283	2828						80		15,372	61	CARDINAL	Coal Steam	Ohio	39
96	D028404	2840	3	1	6	2	2	3	87,801	87,724	62	CONESVILLE	Coal Steam	Ohio	39
97	D02840C02	2840	84	73			81	63	22,791	22,771	62	CONESVILLE	Coal Steam	Ohio	39
98	D028375	2837		86	56		35	70	35,970	35,938	63	EASTLAKE	Coal Steam	Ohio	39
99	D081021	8102			23	71	59	95	18,207	18,191	64	GEN J M GAVIN	Coal Steam	Ohio	39
100	D081022	8102				78			12,333	12,322	64	GEN J M GAVIN	Coal Steam	Ohio	39
101	D028501	2850	36	67	39	53		45	30,798	30,771	65	J M STUART	Coal Steam	Ohio	39
102	D028502	2850	24	65	40	49	98	46	28,698	28,673	65	J M STUART	Coal Steam	Ohio	39
103	D028503	2850	26		72	62			27,968	27,944	65	J M STUART	Coal Steam	Ohio	39
104	D028504	2850	20	77	45	52	88	54	27,343	27,319	65	J M STUART	Coal Steam	Ohio	39
105	D060312	6031			67	77		90	19,517	19,500	66	KILLEN STATION	Coal Steam	Ohio	39
106	D02876C01	2876	40	7	3	9	30	10	72,593	72,529	67	KYGER CREEK	Coal Steam	Ohio	39
107	D028327	2832	65	28	59	22	48	20	46,991	46,950	68	MIAMI FORT	Coal Steam	Ohio	39

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108	D02832C06	2832				60	43	64	23,694	23,673	68	MIAMI FORT	Coal Steam	Ohio	39
109	D028725	2872	74	92	78		90	36	30,079	30,052	69	MUSKINGUM RIVER	Coal Steam	Ohio	39
110	D02872C04	2872	6	19	13	6	19	15	83,134	83,060	69	MUSKINGUM RIVER	Coal Steam	Ohio	39
111	D02864C01	2864	70	56	61	63	49	24	35,193	35,162	70	R E BURGER	Coal Steam	Ohio	39
112	D07253C01	7253		89	58	57		33	30,977	30,949	71	RICHARD GORSUCH		Ohio	39
113	D028665	2866		82				53	19,796	19,779	72	W H SAMMIS	Coal Steam	Ohio	39
114	D028667	2866	57	16	42	41	41	16	33,601	33,572	72	W H SAMMIS	Coal Steam	Ohio	39
115	D02866C01	2866	97	54	93	96	92	30	24,649	24,627	72	W H SAMMIS	Coal Steam	Ohio	39
116	D02866C02	2866		69	92			50	26,022	25,999	72	W H SAMMIS	Coal Steam	Ohio	39
117	D02866M6A	2866		85				58	19,564	19,546	72	W H SAMMIS	Coal Steam	Ohio	39
118	D060191	6019		93		72		60		21,496	73	W H ZIMMER	Coal Steam	Ohio	39
119	D028306	2830	46	38	70	40	12	69	30,466	30,439	74	WALTER C BECKJORD	Coal Steam	Ohio	39
120	D031782	3178	77	63				81	16,484	16,469	75	ARMSTRONG	Coal Steam	Pennsylvania	42
121	D031403	3140	31	34	9	46	18	18	38,801	38,767	76	BRUNNER ISLAND	Coal Steam	Pennsylvania	42
122	D03140C12	3140	52	46	49	69	25	23	29,736	29,709	76	BRUNNER ISLAND	Coal Steam	Pennsylvania	42
123	D082261	8226	25	21	33	42	36	9	40,268	40,232	77	CHESWICK	Coal Steam	Pennsylvania	42
124	D03179C01	3179	16	10	5	8	5	4	79,635	79,565	78	HATFIELD'S FERRY	Coal Steam	Pennsylvania	42
125	D031221	3122	11	6	26	38	17	14	45,754	45,714	79	HOMER CITY	Coal Steam	Pennsylvania	42
126	D031222	3122	9	4	37	92	13	11	55,216	55,167	79	HOMER CITY	Coal Steam	Pennsylvania	42
127	D031361	3136	8	2	4	14	6	1	87,434	87,357	80	KEYSTONE	Coal Steam	Pennsylvania	42
128	D031362	3136	18	3	8	19	8	2	62,847	62,791	80	KEYSTONE	Coal Steam	Pennsylvania	42
129	D03148C12	3148			71		84		17,214		81	MARTINS CREEK	Coal Steam	Pennsylvania	42
130	D031491	3149	19	8	35	7	1	6	60,242	60,188	82	MONTOUR	Coal Steam	Pennsylvania	42
131	D031492	3149	15	5	21	20	3	5	50,276	50,232	82	MONTOUR	Coal Steam	Pennsylvania	42
132	D031131	3113			82				9,674		83	PORTLAND	Coal Steam	Pennsylvania	42
133	D031132	3113			36		93		14,294		83	PORTLAND	Coal Steam	Pennsylvania	42
134	D03131CS1	3131	54	31	79		32	65	22,344	22,324	84	SHAWVILLE	Coal Steam	Pennsylvania	42
135	D033193	3319				100				11,045	85	JEFFERIES	O/G Steam	South Carolina	45
136	D033194	3319		90		87				11,838	85	JEFFERIES	O/G Steam	South Carolina	45
137	D03297WT1	3297		68		61				17,671	86	WATEREE	Coal Steam	South Carolina	45
138	D03297WT2	3297		83		73				17,199	86	WATEREE	Coal Steam	South Carolina	45
139	D03298WL1	3298		35	94	37			25,170	25,148	87	WILLIAMS	Coal Steam	South Carolina	45
140	D062491	6249		58		82				17,920	88	WINYAH	Coal Steam	South Carolina	45
141	D03403C34	3403			85				20,314		89	GALLATIN	Coal Steam	Tennessee	47
142	D03405C34	3405	39						19,368		90	JOHN SEVIER	Coal Steam	Tennessee	47
143	D03406C10	3406	10	11	27	33	4	43	104,523	104,431	91	JOHNSONVILLE	Coal Steam	Tennessee	47

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144	D03407C15	3407	64	87		66	67	76	37,308	37,274	92	KINGSTON	Coal Steam	Tennessee	47		
145	D03407C69	3407	48	98		91	82	91	38,645	38,611	92	KINGSTON	Coal Steam	Tennessee	47		
146	D038033	3803				55				9,493	93	CHESAPEAKE	Coal Steam	Virginia	51		
147	D038034	3803		94		16				10,806	93	CHESAPEAKE	Coal Steam	Virginia	51		
148	D037974	3797				90				9,293	94	CHESTERFIELD	Coal Steam	Virginia	51		
149	D037975	3797		88	44	27	86		19,620	19,602	94	CHESTERFIELD	Coal Steam	Virginia	51		
150	D037976	3797	66	18	7	3	34	66	40,570	40,534	94	CHESTERFIELD	Coal Steam	Virginia	51		
151	D03775C02	3775	47						16,674		95	CLINCH RIVER	Coal Steam	Virginia	51		
152	D038093	3809		52	64	29			10,477	10,468	96	YORKTOWN	Coal Steam	Virginia	51		
153	D03809CS0	3809	96	43	19	17	62		21,219	21,201	96	YORKTOWN	Coal Steam	Virginia	51		
154	D039423	3942						79		10,126	97	ALBRIGHT	Coal Steam	West Virginia	54		
155	D039431	3943	51	23	20	32	16	13	42,385	42,348	97	FORT MARTIN	Coal Steam	West Virginia	54		
156	D039432	3943	50	22	22	31	14	12	45,850	45,809	97	FORT MARTIN	Coal Steam	West Virginia	54		
157	D039353	3935	41	33	28	11	64	26	42,212	42,174	98	JOHN E AMOS	Coal Steam	West Virginia	54		
158	D03935C02	3935	17	42	43	1	11	21	63,066	63,010	98	JOHN E AMOS	Coal Steam	West Virginia	54		
159	D03947C03	3947	86	62	55		57	25	38,575	38,541	99	KAMMER	Coal Steam	West Virginia	54		
160	D03936C02	3936				98			15,480	15,467	100	KANAWHA RIVER	Coal Steam	West Virginia	54		
161	D03948C02	3948	58	13	17	36	9	7	55,405	55,356	101	MITCHELL	Coal Steam	West Virginia	54		
162	D062641	6264	75	49	50	18	77	40	42,757	42,719	102	MOUNTAINEER	Coal Steam	West Virginia	54		
163	D03954CS0	3954	68		24	25	23	67	20,130	20,112	103	MT STORM	Coal Steam	West Virginia	54		
164	D0393851	3938				79		97	12,948	12,936	104	PHILIP SPORN	Coal Steam	West Virginia	54		
165	D03938C04	3938				94			26,451	26,427	104	PHILIP SPORN	Coal Steam	West Virginia	54		
166	D060041	6004			66		83	31	21,581	21,562	105	PLEASANTS	Coal Steam	West Virginia	54		
167	D060042	6004			88			92	20,550	20,532	105	PLEASANTS	Coal Steam	West Virginia	54		

Notes:
Plants in Red are added as a result of MM5 met modeling.
List does not include sources in states that do not contribute 2% of visibility impact to MANE VU Class I areas.
MM5 by ERM for Maryland

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