Appendix A: Summary of and Response to Federal Land Manager Comments

As required by 40 CFR 51.308(i), FLMs were provided 60 days to review and comment on DEC’s draft “New York State Implementation Plan Revision for Regional Haze.” The draft plan was sent electronically to FLMs at the U.S. Fish and Wildlife Service (FWS), the U.S. Forest Service (FS) and the National Park Service (NPS) on February 22, 2019. Comments were received from the FS and the NPS. The FWS indicated that they did not have any comments on April 17, 2019.

General Comments

1. **Comment:** The NPS requested that DEC explain the changes in emissions between the most recent inventory from 2014 (reported in Table 7-1 and 7-13) and the 2028 inventory projections used by MANE-VU and reported by DEC in Table 7-33. Since the EPA Air Markets Program data indicate that combined Electric Generating Unit (EGU) emissions in NY continued to decrease between 2014 and 2018, it is not clear why total EGU plus non-EGU point source emissions do not show substantive decreases between 2014 and 2028 (see attached tables created from data in Table 7-1, 7-13, and 7-33.) As part of this inquiry, NPS requested the growth factors used for EGU and non-EGU point? NPS also asked if all the ongoing controls programs discussed in the long-term strategy in Section 10 are accounted for in the MANE-VU 2028 modeling inventory for New York?

   **Response:** The 2028 projections were based on a 2011 base year and the 2014 inventory was developed later with a different methodology and therefore 2014 cannot be compared to 2028 by sector. Most specifically for point sources, 2014 includes airports and the Air Markets Program Data includes some non-EGUs. The projections were also intentionally conservative for planning purposes, but decreases are illustrated from 2011 to 2028.

2. **Comment:** The NPS appreciates DEC’s responses concerning future emission control information for 26 facilities that we had previously identified as potential candidates for four-factor Reasonable Progress analyses. Several of those facilities have reduced emissions, or are on a path to do so, so we see no need for further analyses. Other facilities are subject to ongoing actions (e.g., possible Reasonably Achievable Control Technology (RACT) regulations) or could still be candidates for four-factor analyses. We are especially interested in what additional control measures DEC is considering for three EGU facilities: Northport, Ravenwood, and Roseton.

   **Response:** The information provided for Alcoa Massena Operations (West Plant); Globe Metallurgical, Inc.; and Northeast Solite were updated to better address
the National Park Service’s concerns with recent emissions. Northport, Ravenswood, and Roseton have oil and natural gas capacity, but for reliability and in cases of curtailment, they occasionally have to switch over to oil.

3. **Comment:** The NPS requested more information on several EGUs and wanted to know if more reductions were in the works for EGUs in general.  
   **Response:** EGUs in NY have cut their emissions in half from a decade ago due to the application of RACT based on high control cost thresholds – currently valued at approximately $5,000 per ton of NOx reduced. Section 10.3.6 discussed New York’s proposed Subpart 227-3 rule to control “peaking” units, which will greatly reduce emissions in the New York metropolitan area on high electric demand days. Also, the newly adopted revisions to Part 251, CO₂ Performance Standards for Major Electric Generating Facilities, will require the remaining coal plants in the state to capture and control CO₂, repower with clean fuels, or shutdown by December 31, 2020. The owners have indicated a desire to shutdown these facilities. The New York State Climate Leadership and Community Protection Act (CLCPA) requires a reduction in statewide GHG emissions by 60% by 2030 and 85% by 2050.

4. **Comment:** The NPS asked for clarification if any of the facilities they identified are peaking units and if NY had plans to control emissions from units that operate on high electric demand days.  
   **Response:** Ravenswood has retired most of their peaking units. The proposed Part 227-3 sets lower emission limits for many of the peaking units that operate on high electric demand days.

**Document-Specific Comments**

**5. Assessment of Baseline and Natural Conditions**

5. **Comment:** In Section 5.1, it is noted that the Presidential Range/Dry River Wilderness Area and the Otter Creek Wilderness Area do not have natural background haze levels. It should also be noted that Great Gulf Wilderness Area and Dolly Sods Wilderness Area natural background haze levels, respectively, are representative for the two above mentioned Wilderness Areas without natural background haze levels. [FS]

   **Response:** Section 5 was revised to indicate that the Presidential Range/Dry River Wilderness Area and the Otter Creek Wilderness Area are represented by Great Gulf Wilderness Area and Dolly Sods Wilderness Area natural background haze levels, respectively.
6. Monitoring Strategy

6. **Comment:** In Section 6.3.5. there is a discussion about the Lye Brook Wilderness Area and monitoring site LYBR1. LYEB1, on the southeast shoulder of Mount Snow, Dover, VT, replaced LYBR1 in January 2012. [FS]

**Response:** Section 6.3.5. was revised to include the new monitor at the Lye Brook Wilderness Area.

7. Emission Inventory

7. **Comment:** In Section 7.1.4., please review and confirm the percentages of light extinction in the “baseline” period and the “previous planning period”. It appears that the particle-related light extinction in the baseline period due to sulfate particles on the haziest days accounts for 75% of the total light extinction, while in the previous planning period that value might be 50%. [FS]

**Response:** The percentages of light extinction in the “baseline” period and the current conditions were recalculated and clarified.

10. Long-term Strategy

8. **Comment:** Section 10.4.1. should reference Section 10.5.3. for more details regarding Lafarge Building Materials. [FS]

**Response:** The section number reference to Lafarge Building Materials in Section 10.4.1 has been corrected.

9. **Comment:** In the four factor analysis section of Section 10, there is no mention of Oswego Harbor Power, Unit 6, Electric Generating Unit (Facility/ORIS ID 2594). It is our understanding that this has a greater regional haze impact on the Lye Brook Class I area than Somerset Operating Company (Kintigh), Unit 1, which is included in the four factor analysis section of Section 10. Please consider adding a discussion of Oswego Harbor Power, Unit 6, to Section 10. [FS]

**Response:** Combined with response to #10.

10. **Comment:** In the four factor analysis section of Section 10, there is no mention of Industrial Sources Norlite Corporation (Facility ID 8090911) or Cargill Salt Co – Watkins Glen Plant (Facility ID 8176611). The SO₂ emissions from these facilities were 2888 tons per year and 1280 tons per year in 2011, respectively. Please consider adding a discussion of the Norlite Corporation and the Cargill Salt Co – Watkins Glen Plant facilities to Section 10. [FS]

**Response (9 & 10):** Section 10.5, Forest Service Evaluation Request, has been added to address emissions from Oswego Harbor Power, Unit 6, Electric Generating Unit (Facility/ORIS ID 2594); Norlite Corporation (Facility ID 8090911); and Cargill Salt Co – Watkins Glen Plant (Facility ID 8176611).
National Park Service Comments:

Thank you again for the opportunity to discuss New York Department of Environmental Conservation (DEC)'s February 2019 draft of the New York State Implementation Plan (SIP) Revision for Regional Haze for the second implementation period 2018-2028.

As we mentioned on the April 25 conference call, while NY does not contain any Class I areas managed by the National Park Service (NPS), emissions from sources in the state can affect visibility at Acadia National Park in Maine and Shenandoah National Park in Virginia. Both these park units are Class I areas. As a result, the strategy that DEC sets forth for New York in its SIP is germane to the NPS, both under the Clean Air Act's Regional Haze Program and the NPS Organic Act.

Below we summarize the major points we discussed on our conference call.

- DEC succinctly documented the MANE-VU regional technical analyses. We asked DEC to help us understand the changes in emissions between the most recent inventory, 2014, (reported in Table 7-1 and 7-13) and the 2028 inventory projections used by MANE-VU and reported by DEC in Table 7-33. Since the EPA Air Markets Program data indicate that combined Electric Generating Unit (EGU) emissions in NY continued to decrease between 2014 and 2018, it is not clear why total EGU plus non-EGU point source emissions are not showing substantive decreases between 2014 and 2028 (see attached tables created from data in Table 7-1, 7-13, and 7-33.) As part of this inquiry, we asked what growth factors were used for EGU and non-EGU point? We also asked if all the ongoing controls programs discussed in the long-term strategy in Section 10 are accounted for in the MANE-VU 2028 modeling inventory for New York? DEC committed to look into these issues and respond to NPS. The comparison of 2014 and 2028 emissions is critical to DEC’s demonstration that NY has included the emission reduction measures that are necessary to make reasonable progress in each affected mandatory Class I Federal areas [40 CFR 51.308 (f)(2)(iii)]. The DEC agreed that additional reductions may be coming for the MANE-VU region but those potential reductions are not reflected in the tables.

- We appreciate DEC’s responses concerning future emission control information for 26 facilities that we had previously identified as potential candidates for four-factor Reasonable Progress analyses. Several of those facilities (highlighted in green) have reduced emissions, or are on a path to do so, so we see no need for further analyses. Other facilities (highlighted in yellow) are subject to ongoing actions (e.g., possible Reasonably Achievable Control Technology, RACT, regulations) or could still be candidates for four-factor analyses. We are especially interested in what additional control measures DEC is considering for
three EGU facilities (highlighted in orange): Northport, Ravenwood, and Rosetont. Facilities without highlights are of a lower level of interest to the NPS and the NPS has just requested further information on those facilities (identified at the bottom of spreadsheet).

- DEC responded with willingness to follow-up with additional information for specific sources. The Northport and Ravenwood EGU in NY City are allowed to burn residual oil when natural gas fuel use is curtailed. NY is considering eliminating residual oil as a fuel option in NY City as part of NY effort to be 100% renewable energy by 2040. DEC will follow up with us on emissions control options for the 3 EGU facilities, Alcoa, Globe Metallurgical, and Northeast Solite.

- We also discussed High Energy Demand Days (HEDD) and asked if NY has any HEDD sources. NY replied they have several small HEDD sources. The NPS asked what if any controls or limits can be applied to this source type and suggested those actions be included in the draft SIP.

We look forward to further dialogue with you and your staff as you firm up the state’s planned steps under the SIP. If you have any questions, please do not hesitate to reach out to me at 303-969-2341.

--

Kirsten King
Branch Chief, Policy Planning and Permit Review
Air Resources Division (ARD)
National Park Service
7333 W. Jefferson
Lakewood, CO 80235
Office: (303) 969-2341
Cell: (720) 515-8738
Robert G. Sliwinski  
Assistant Director, Division of Air Resources  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-3250

Dear Mr. Sliwinski:

On February 22, 2019, the State of New York submitted a draft Regional Haze State Implementation Plan describing your proposal to continue improving air quality by reducing regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with your 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 Class I areas.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service, has received and conducted a substantive review of your proposed Regional Haze State Implementation Plan in fulfillment of your requirements under the federal regulations, 40 C.F.R. § 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the ability to approve the document.

We have attached comments to this letter based on our review. We look forward to your response required by 40 C.F.R. § 51.308(i)(3). For further information, please contact Ralph Perron (ralph.perron@usda.gov) or Bret Anderson (baanderson02@fs.fed.us).

Again, we appreciate the opportunity to work closely with the State of New York. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

JOHN A. SINCLAIR  
Forest Supervisor

Enclosure
cc: Shawn Olson, Clare Mendelsohn, Martina Barnes, Dan McKinley, Ralph Perron, Bret Anderson, Amanda Chudow
In Section 5.1. it is noted that the Presidential Range/Dry River Wilderness Area, and the Otter Creek Wilderness Area do not have natural background haze levels. It should also be noted that Great Gulf Wilderness Area, and Dolly Sods Wilderness Area, natural background haze levels, respectively, are representative for the two above mentioned Wilderness Areas without natural background haze levels.

In Section 6.3.5. there is a discussion about the Lye Brook Wilderness Area and monitoring site LYBR1. LYEBl, on the southeast shoulder of Mount Snow, Dover, VT, replaced LYBR1 in January, 2012.

In Section 7.1.4., please review and confirm the percentages of light extinction in the “baseline” period and the “previous planning period”. It appears that the particle related light extinction in the baseline period due to sulfate particles on the haziest days accounts for 75% of the total light extinction, while in the previous planning period that value might be 50%.

Section 10.4.1. should reference Section 10.5.3. for more details regarding Lafarge Building Materials.

In the four factor analysis section of Section 10, there is no mention of Oswego Harbor Power, Unit 6, Electric Generating Unit (Facility/ORIS ID 2594). It is our understanding that this has a greater regional haze impact on the Lye Brook Class I area than Somerset Operating Company (Kintigh), Unit 1, which is included in the four factor analysis section of Section 10. Please consider adding a discussion of Oswego Harbor Power, Unit 6, to Section 10.

In the four factor analysis section of Section 10, there is no mention of Industrial Sources Norlite Corporation (Facility ID 8090911) or Cargill Salt Co – Watkins Glen Plant (Facility ID 8176611). The SO₂ emissions from these facilities were 2888 tons per year and 1280 tons per year in 2011, respectively. Please consider adding a discussion of the Norlite Corporation and the Cargill Salt Co – Watkins Glen Plant facilities to Section 10.