

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

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July 1, 2013

Memorandum

To: John Sipple, Delaware Department of Natural Resources and Environmental Control,
Division of Air Quality

From: Pat Brewer, NPS Air Resources Division

Subject: NPS and FWS Joint Comments on Delaware 5-Year Progress Report for Regional Haze

In consultation with the U. S. Fish and Wildlife Service, the National Park Service has reviewed Delaware's (DE) draft Regional Haze 5-Year Periodic Report. We believe that DE has met the requirements for the periodic progress report as outlined in 40 CFR 41.508 (g). DE has demonstrated that sulfate is the major pollutant contributing to visibility impairment at the Class I areas in neighboring states (there are no Class I areas in DE) and that reducing sulfur dioxide (SO₂) emissions is the most effective approach to improve visibility. DE reports progress on the long term emissions control strategies that were developed by the MANE-VU states and used to define reasonable progress goals for Class I areas in MANE-VU states:

- 1) Best Available Retrofit Technology: In 2008 DE implemented state rule 7 DE Admin Code 1146 to reduce SO₂ and nitrogen oxide (NO_x) emissions from electric generating units (EGU) in the state. EGUs subject to BART and non-BART units are covered in this state rule and cumulative emissions reductions under the rule are greater than would be accomplish under BART alone. DE's rule was included in MANE-VU assumptions for 2018 reasonable progress goals.
- 2) 90% control of SO₂ from 167 largest EGU. MANEVU's list of 167 largest EGU includes units covered by DE's rule. Implementation of DE's rule by 2011 has resulted in greater SO₂ emissions reductions than controls on just those units included in MANEVU's list.
- 3) Low-sulfur fuel: DE did not originally commit to meeting this MANEVU goal but in June 2013 implemented a low sulfur fuel rule that will be effective by 2016. Emissions under this rule were not included in MANE-VU's 2018 reasonable progress goals.
- 4) Other reasonable measures: DE reports on consent decrees with refineries and implementation of Maximum Achievable Control Technology (MACT) for industrial boilers that were included in MANE-VU reasonable progress goals. Not anticipated in

DE's 2008 State Implementation Plan are the Mercury and Air Toxics Rule, 1-hour SO₂ national Ambient Air Quality Standard, and the North American Emission Control area which will reduce emissions from commercial marine vessels.

These actions provide evidence that DE will meet or exceed the emissions reductions that were included in its 2008 State Implementation Plan and will not interfere with the ability of neighboring states to meet the reasonable progress goals set for Class I areas.

Please note that in Figure 6 and 7, the labels for the x and y axis are missing.

We appreciate the opportunity to work closely with DE to improve visibility in our Class I national park and wilderness areas. If you have questions, please contact me at patricia_f_brewer@nps.gov or 303-969-2153.

Delaware Department of Natural Resources and Environmental Control, Division of Air Quality (DAQ) Responses to the United States Department of the Interior, Fish & Wildlife Service, and the National Park Service Federal Land Manager Comments

The DAQ appreciates the positive comments provided by the United States Department of the Interior: Fish & Wildlife Service and the National Park Service. Delaware agrees with the comments that “[*Delaware*] actions provide evidence that DE will meet or exceed the emissions reductions that were included in its 2008 State Implementation Plan and will not interfere with the ability of neighboring states to meet the reasonable progress goals set for Class I areas.”

DAQ has also corrected the x and y axis for Figures 6 and 7 by adding labels.