

Salmon, Olivia E -DNR

From: Pohlman, David C. <David_Pohlman@nps.gov>
Sent: Friday, April 2, 2021 10:10 AM
To: Loftus, Jonathan P - DNR; Peters, Melanie; Wickman, Trent R -FS; Shepherd, Don; Stacy, Andrea; Miller, Debra C; King, Kirsten L; Allen, Tim; Liu.Alisa@epa.gov
Cc: Good, Gail - DNR; Salmon, Olivia E -DNR; Bower, Phillip R - DNR
Subject: WI Regional Haze Plan NPS Consultation
Attachments: WI RP facilities.xlsx

Categories: Green Category

Hello Jon,

The National Park Service (NPS) appreciates the opportunity to review the Wisconsin Department of Natural Resources' February 2021 draft of the Wisconsin Regional Haze State Implementation Plan (SIP) for the Second Implementation Period (2018-2028). This email summarizes the consultation call we had in coordination with the other Federal Land Management agencies on March 23, 2021 as well as our review of several SIP components. As such, this email serves as documentation of NPS conclusions and recommendations resulting from formal regional haze consultation as required by 42 U.S.C. §7491(d). While Wisconsin does not contain any NPS managed Class I areas, emissions from sources in the state affect visibility at Isle Royale National Park in Michigan and Voyageurs National Park in Minnesota. We appreciate your continued involvement in the Lake Michigan Air Directors Consortium (LADCO) and commitment to reducing pollutants in the region to help improve visibility in all Class I areas.

We have two primary concerns with the current draft of the Wisconsin Regional Haze Plan:

1. The number of facilities selected for reasonable progress four-factor analysis is too low. Wisconsin used an emissions over distance (Q/d) threshold of 10 and selected two facilities for 4-factor analyses, capturing about 50% of the total state total Q/d. Based on analysis of distance to NPS Class I areas and recent emissions, revising this threshold to a Q/d of 4 would identify an additional six facilities for a total of eight (see attached spreadsheet). Selecting these eight facilities for evaluation would be more regionally consistent with the number of facilities considered by other LADCO states and would account for over 70% of total Q/d in Wisconsin. Wisconsin has not adequately demonstrated why the selection of two facilities for four-factor analyses is "reasonable," particularly considering the inconsistency with other states in the LADCO region.
2. We disagree with Wisconsin DNR's conclusion that no new emissions controls are warranted in this planning period. Reasonable progress goals are established through the application of the four factors (40 CFR § 51.308 d 1):
 - a. costs of compliance,
 - b. the time necessary for compliance,
 - c. the energy and non-air quality environmental impacts of compliance, and
 - d. the remaining useful life

Wisconsin DNR identified technically feasible and cost-effective control opportunities for visibility impairing SO₂ and NO_x emissions at both facilities that were evaluated (AM Kaukauna

and AM Rhinelander). Wisconsin's four factor analyses relied on a 2015 LADCO report—the SIP notes that Wisconsin updated the 2015 cost information based on the 2020 Chemical Engineering Plant Cost Index (CEPCI). We find that the cost information in the 2015 LADCO Report cites a previous 2005 report for much of the cost data and that LADCO already adjusted the values in the 2015 report using the CEPCI to update between 2005 and 2015. As such, this cost data is significantly outdated, and a new analysis is likely warranted.

Even so, Wisconsin finds that post-combustion controls for these sources would be reasonable based on the four statutory factors identified in the Clean Air Act. However, Wisconsin is not basing its control decisions on the results of the four factor analyses, but instead points to: emissions reductions which have occurred since Round 1, the fact that the uniform rate of progress (URP) is already being met, and the fact that SO₂ emissions are being addressed under the 2010 1-hour SO₂ National Ambient Air Quality Standards (NAAQS).

We appreciate the gains being made to reduce visibility impairing air pollution through shut-downs and other measures and recognize that Class I areas affected by Wisconsin emissions are ahead of URP goals. However, as explicitly discussed in the preamble to the 2017 final Regional Haze Rule ([82 FR 380](#)), this does not justify the decision to delay or forego reasonable controls. The URP is not a safe harbor that can be used to stall reasonable progress toward the ultimate goal of no human caused visibility impairment in Class I areas. Further, we are not compelled by the discussion of potential future emission reductions to address SO₂ NAAQS. The strategies that may be employed to meet this health standard will certainly not address NO_x emissions and will most likely not benefit regional haze as much as cost-effective SO₂ controls identified through 4-factor analysis. The suggestion that they will is aspirational at best.

In conclusion, we encourage Wisconsin to adopt a lower Q/d threshold for facility selection, conduct 4-factor analyses for selected sources, and require all technically feasible and cost-effective emissions reductions identified for SO₂ and NO_x through these analyses. In doing so, Wisconsin would be taking necessary and reasonable steps to advance clean air and clear views in NPS Class I areas in this planning period.

Please know that we welcome the opportunity for further dialogue with you as Wisconsin progresses to a final SIP revision. If you have any questions, do not hesitate to reach out to us. Also, feel free to let us know if you have any edits to this summary and especially if any corrections are needed.

Best,

David

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Year	Source	EIS ID	County	Facility Name	NAICS #	NAICS Code Description	Latitude	Longitude	State	NOX	SO2	Q	Distance to NPS Class I Area	Q/d	NPS Class I Area
2017NEI_Aug2019_PT	NEI	6467811	Outagamie	EXPERA SPECIALTY SOLUTIONS LLC Kaukauna	322121	Paper (except Newsprint) Mills	44.283	-88.252	WI	1,577	6,532	8,109	393	20.6	ISRO
2017NEI_Aug2019_PT	NEI	7048011	Oneida	EXPERA SPECIALTY SOLUTIONS Rhinelander	322121	Paper (except Newsprint) Mills	45.639	-89.421	WI	1,168	1,596	2,764	238	11.6	ISRO
2017NEI_Aug2019_PT	NEI	4193911	Wood	WISCONSIN RAPIDS PAPER MILL	322121	Paper (except Newsprint) Mills	44.399	-89.826	WI	1,875	1,622	3,497	377	9.3	ISRO
2017NEI_Aug2019_PT	NEI	4787911	Marathon	EXPERA SPECIALTY SOLUTIONS LLC Mosinee	322121	Paper (except Newsprint) Mills	44.789	-89.694	WI	640	1,469	2,109	334	6.3	ISRO
2020		56068	Milwaukee County	Oak Creek/Elm Road Generating Station	221112	Fossil Fuel Electric Power Generation	42.845	-87.829	WI	2,218	617	2,835	556	5.1	ISRO
2017NEI_Aug2019_PT	NEI	4985511	Douglas	GRAYMONT (WI) LLC	327410	Lime Manufacturing	46.731	-92.077	WI	454	454	908	179	5.1	VOYA
2020		4078	Marathon County	Weston	221112	Fossil Fuel Electric Power Generation	44.861	-89.655	WI	1,008	623	1,631	325	5.0	ISRO
2017NEI_Aug2019_PT	NEI	4193811	Wood	ND PAPER INC-BIRON DIVISION	322121	Paper (except Newsprint) Mills	44.429	-89.782	WI	968	565	1,533	374	4.1	ISRO

67.1

Effectively-controlled
Facility started idling indefinitely Aug. 2020 due to demand drop.
selected by WI