



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

July 8, 2020

Mr. John Hornback
Executive Director
Metro 4/SESARM/VISTAS

ELECTRONIC COPY ONLY

RE: VISTAS Request for Regional Haze Reasonable Progress Analyses for Pennsylvania Sources Impacting VISTAS Class I Areas

Dear Mr. Hornback:

On June 22, 2020, the Pennsylvania Department of Environmental Protection (DEP or Department) received a letter from the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) regarding its "Request for Regional Haze Reasonable Progress Analyses for Pennsylvania Sources Impacting VISTAS Class I Areas."

As you are aware, Pennsylvania is a member of the Mid-Atlantic/Northeast Visibility Union (MANE-VU). MANE-VU states, including Pennsylvania, are currently in the process of developing Regional Haze SIPs for the second planning period, covering the years 2018 through 2028. Although there are no mandatory Class I Federal areas (Class I areas) in Pennsylvania, emissions from Pennsylvania sources affect Class I areas in other nearby states, including several VISTAS states.

First, in reviewing your letter, I would like to point out that the references to 40 CFR § 51.308(d) are incorrect, as this section is only applicable to the first implementation period. Instead, 40 CFR § 51.308(f) applies to the second and future planning periods. With the (d) versus (f) citation issue aside, DEP agrees that the requirements nonetheless exist (in 40 CFR §§ 51.308(f) and 51.308(f)(3)) to address regional haze in each Class I area located outside of the state and that reasonable progress goals are still applicable.

DEP appreciates your analysis which identified three Pennsylvania sources with a sulfate or nitrate impact on one or more VISTAS Class I areas greater than or equal to 1.00 percent of the total sulfate plus nitrate point source visibility impairment on the 20 percent most impaired days for each Class I area. These sources are the Seward Generation Station (42063-3005111), Homer City Generation (42063-3005211), and Keystone Station (42005-3866111). At this time, the 2028 projections that you have presented appear reasonable.

On May 26, 2020, the Department sent requests to nine Pennsylvania facilities, including the Seward, Homer City and Keystone facilities, to conduct 4-factor analyses. Copies of the letters and attachments to Seward, Homer City and Keystone are attached for your reference. Please note that several Pennsylvania facilities have requested a one-month extension to the July 31, 2020 due date. The Department will share these analyses with you following DEP's review.

Mr. Hornback

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Should you or any of the state contacts have questions, please contact Bryan Oshinski, Air Quality Program Specialist of the Air Resource Management Division, by e-mail at boshinski@pa.gov or by telephone at 717.783.8949, or Robert Cook, Air Quality Engineering Specialist of the Bureau of Air Quality's Permitting Division, by email at rwcook@pa.gov or by telephone at 717.772.3974.

Sincerely,

Viren Trivedi

Viren Trivedi
Acting Director

Attachments

cc: Mr. Kirit Dalal, DEP
Mr. Randy Bordner, DEP
Mr. Nash Bhatt, DEP
Mr. Bryan Oshinski, DEP
Mr. Robert Cook, DEP