Message

From: Feldman, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3231D9F1AD5147A9A0C81B36E0FB2B68-FELDMAN, MICHAEL]
Sent: 8/14/2020 5:54:45 PM
To: 'Donaldson, Guy' [donaldson.guy@epa.gov]; Jennifer Huser (huser.jennifer@epa.gov) [huser.jennifer@epa.gov]; Medina, Dayana [medina.dayana@epa.gov]
CC: Timin, Brian [Timin.Brian@epa.gov]; Schramm, Daniel [Schramm.Daniel@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]
Subject: FW: Initial feedback on TX 4-factor Analyses Outreach

NPS comments on TX consultation presentation.

From: Peters, Melanie <Melanie_Peters@nps.gov>
Sent: Friday, August 14, 2020 12:49 PM
To: Feldman, Michael <Feldman.Michael@epa.gov>
Subject: Fw: Initial feedback on TX 4-factor Analyses Outreach

FYI -

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Melanie V. Peters
NPS, Air Resources Division

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From: Peters, Melanie <Melanie_Peters@nps.gov>
Sent: Friday, August 14, 2020 11:41 AM
To: Walker Williamson <walker.williamson@tceq.texas.gov>
Cc: King, Kirsten L <kirsten_king@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>
Subject: Initial feedback on TX 4-factor Analyses Outreach

Hello Walker,

Thank you for the briefing that you and other members of the TCEQ Air Quality Division provided last week updating FLMs on Texas Regional Haze SIP development for this planning period.

We (NPS Air Resources Division) still have unresolved questions regarding some of the Texas-based emission sources that were not selected for 4-factor analysis. The lack of detail regarding the Texas source selection analyses makes it impossible for us to verify assertions regarding the defensibility of the process. Please see my email of 5/28/2020 for a recap of our outstanding questions and information requests.

Regarding the new materials presented on August 4th, we have several questions and concerns, some of which are discussed below, and some which may follow as we gain more understanding of the Texas approach. We are both impressed with the pace of progress Texas is making on SIP completion and disappointed that no new emission controls are being pursued as part of the state's draft long-term strategy. Based on the information that you presented, we believe there are several reasonable opportunities to reduce visibility-impairing emissions and ask that you reconsider the decision not to do so.

Air clarity is essential for experiencing the crisp detail and vivid colors that make the sweeping views of Texas from Big Bend and Guadalupe Mountains National Parks so spectacular. Far too often these views and those in other Class I areas are diminished by air pollution. According to your analysis, the Texas contribution to this pollution could be reduced by more than 79,000 tons per year of SO_2 for an average cost of less than $2,500/ton. This is half the cost/ton used by many states during Round 1 of Regional Haze SIP development ($5,000/ton). EPA and other states have expressed the expectation that emission reductions in both this and future planning periods will be more expensive than they were in the baseline period.

We contend that it would be reasonable for Texas to implement all of the emission controls identified through the 4-factor analysis process for SO_2 in order to reduce visibility impairment in Class I areas. Further, it is our position that Texas could reasonably identify and implement additional emission reductions by evaluating additional sources and increasing the cost threshold for consideration.

Moreover, we have questions regarding the cost analysis presented on August 4th:

- What were the baseline emission data used to evaluate non-EGU sources in the analysis?
    - Please provide the 2016 TCEQ point source emissions inventory referenced on Slide 8 for evaluation and share any updates to these and/or the 2018 CAMD data used in the analysis.
- On what basis did Texas determine that no technically feasible controls exist for the three sources excluded from analysis?
- For each facility evaluated, what control cost and interest rate were used to determine the cost of control? Did Texas use the methods described in EPA's Control Cost Manual (e.g., the overnight costing method)? Please provide the four-factor analyses for each facility analyzed.
- When calculating capital recovery, why did Texas assign the same useful life of 15 years to all controls evaluated in the analysis? The EPA Control Cost Manual uses a 20 year equipment life for SNCR and a 30 year equipment life for SCR when applied to power-plants. It would be more appropriate to use a source and control specific useful life than to assume a standard one.

With respect to the sensitivity analysis presented, demonstrating visibility improvement is not necessary to justify emission reductions. The Clean Air Act provides four factors which as act "off-ramps" to eliminate a control technology from selection; the Clean Air Act does not include a fifth visibility-improvement "off-ramp" factor for reasonable progress. EPA's 2019 Regional Haze Guidance allows states to consider potential visibility benefits when selecting controls, noting that "a state should not use the difference in projected 2028 visibility with and without the control measure (e.g., the effect on the 2028 RPG) as its only characterization of the visibility benefit of the measure."

In order to better understand the Texas approach, please explain:

- How were the deciview improvement values determined?
- What does the chart on slide 17 show? Do the impairment reduction values graphed indicate modeled differences on a "representative" day in June, over the period that was modeled, or on a specific set of days (e.g., most impaired days)?

- What are the light extinction values used to generate the deciview improvements shown on slide 17?
- What is the basis for determining that the level of reduced visibility impairment is insignificant?

While we appreciate that the cumulative emission reductions on visibility impairment were considered in the sensitivity analysis (rather than by source), it does not make sense to take an all-or-nothing approach to control decisions. This averaging approach is contrary to the intent of the regional haze guidance and likely obscures opportunities to reduce emissions from some facilities with control costs well below the average cost.

Thank you for your consideration. As Texas works toward finalizing and submitting a regional haze SIP we sincerely ask the state to seek and advance opportunities to reduce haze causing emissions. As your own analysis has shown, significant emissions reductions are both possible and necessary to make reasonable progress on improving visibility in this planning period and beyond.

Best,
Melanie

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