United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225

IN REPLY REFER TO:

N3615 (2350)

March 28, 2012

Guy Donaldson, Chief
Air Planning Section (6PD-L)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

EPA Docket ID: EPA–R06–OAR–2008–0510

Dear Mr. Donaldson:

The National Park Service (NPS) has reviewed the Environmental Protection Agency's (EPA's) proposed "Approval and Promulgation of Implementation Plans; Louisiana; Regional Haze State Implementation Plan." NPS also reviewed EPA's separate action in December 2011 (76 FR 82219) that partially disapproved Louisiana's Regional Haze Plan because it relied on emissions reductions under the Clean Air Interstate Rule (CAIR) to meet the Best Available Retrofit Technology (BART) and long term strategy requirements of the Regional Haze Rule. CAIR has been replaced by the Cross State Air Pollution Rule (Transport Rule) and in its December 2011 action EPA proposed that the emissions trading program under the Transport Rule achieves greater visibility improvement in Class I areas than source specific BART controls for those states covered by the Transport Rule.

The Transport Rule, and its predecessor CAIR, were designed to address interstate contributions to nonattainment of the national health standards for fine particles and ozone, mainly in urban areas in 28 eastern states. These rules were not designed to address visibility in national parks and wilderness areas. Under CAIR, electric generating units (EGU) in Louisiana were required to reduce emissions of both sulfur dioxide (SO_2) and nitrogen oxide (NO_x) that contribute to nonattainment of the fine particle and ozone standards in downwind areas. Under the Transport Rule, EGU in Louisiana are required to control only NO_x contributing to ozone and to operate those NO_x controls only during the ozone season.

NPS disagrees with EPA's conclusion that (summertime) NO_x emissions reductions in Louisiana under the Transport Rule will achieve greater visibility improvement than source specific controls under BART. Gaseous NO_x emissions react in the atmosphere to form ammonium nitrate particles which impair visibility. The formation of ammonium

nitrate is limited at higher temperatures, and therefore ammonium nitrate particles and visibility impairment due to these particles are highest in the colder months. This is illustrated in the enclosed figure of IMPROVE monitoring data for the 2000-2004 baseline period for the Breton Islands Class I area in Louisiana. Visibility impairment due to ammonium nitrate peaks during the winter months and is very low during the summer.

NO_x emissions controls that only operate during the ozone season will not address the visibility impact due to wintertime ammonium nitrate at Breton Island or other Class I areas in neighboring states. We recommend that EPA require year-round NO_x controls from those EGU in Louisiana that are required to control NO_x emissions under the Transport Rule.

Because SO_2 emissions from EGU in Louisiana are not covered by the Transport Rule, we agree with EPA that Louisiana Department of Environmental Quality (LDEQ) will have to evaluate source specific SO_2 controls for EGU that are subject to the BART requirements.

We appreciate the opportunity to work closely with the LDEQ and EPA to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Pat Brewer at (303) 969-2153.

Sincerely,

Susan Johnson
Chief, Policy, Planning and Permit Review Branch

Enclosure

cc:
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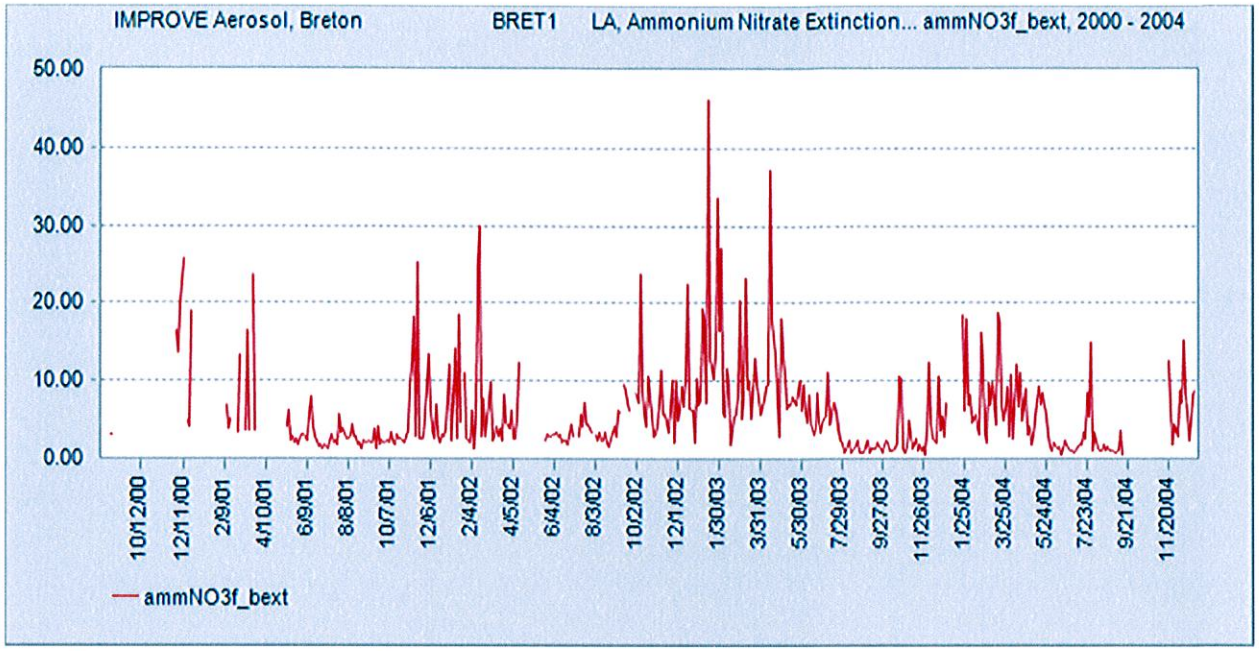

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