



United States
Department of
Agriculture

Forest
Service

White Mountain
National Forest

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File Code: 2580

Date: January 26, 2009

Ms. Barbara Kwetz
Director, Planning and Evaluation Division
Bureau of Waste Prevention
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dear Ms. Kwetz:

On November 25, 2008, the Commonwealth of Massachusetts submitted a draft implementation plan describing your proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the Commonwealth through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I wilderness areas and parks.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service has received and conducted a substantive review of your proposed Regional Haze Rule implementation plan. Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the ability to approve the document. The Forest Service's participation in the Commonwealth of Massachusetts' administrative process does not waive any legal defenses or sovereignty rights it may have under the laws of the United States, including the Clean Air Act and its implementing regulations.

We have attached comments to this letter from the perspective of a Federal Land Manager. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Air Quality Specialists Ralph Perron at (802) 222-1444 or Scott Copeland at (307) 332-9737.



Again, we appreciate the opportunity to work closely with the Commonwealth of Massachusetts. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

/s/ Thomas G. Wagner
THOMAS G. WAGNER
Forest Supervisor

cc: Scott A Copeland, Air Quality Specialist, USDA Forest Service
Ralph Perron, Air Quality Specialist, USDA Forest Service
Dave Conroy, Environmental Protection Agency, Region 1
Aimee Powelka, Environmental Analyst, MA Bureau of Waste Prevention

USDA Forest Service Comments Regarding Massachusetts Draft Regional Haze Rule State Implementation Plan

On November 25, 2008, the Commonwealth of Massachusetts submitted a draft Regional Haze Rule State implementation plan (SIP), pursuant to the requirements codified in federal rule at 40 CFR 51.308(i)(2), to the USDA Forest Service (FS). The air program staff of the FS conducted a substantive review of the Massachusetts draft plan, and have provided the comments listed below. We look forward to the Massachusetts Department of Environmental Protection (MDEP) response as per section 40 CFR 51.308(i)(3). For further information regarding these comments, please contact Ralph Perron at (802) 222-1444 or Scott Copeland at (307) 332-9737.

Overall Comment

The MDEP has submitted a well-written draft Regional Haze SIP. The draft SIP addresses several important issue areas as well as acknowledging the many uncertainties faced by MANE-VU in regards to emission inventories, modeling assumptions and modeling results.

BART and CAIR

We concur that the application of BART analyses to BART eligible facilities is appropriate given the uncertainties associated with CAIR.

Like our FLM partners, we are concerned about the adequacy of the BART determinations. We do not reproduce their detailed comments below, but support the comments they submitted to you.

Prevention of Significant Deterioration

The Forest Service routinely requests that SIPs include language linking the Regional Haze Program with the Prevention of Significant Deterioration program. We note that the PSD program can be an effective tool to prevent degradation of “Best Days”, and that new sources should be consistent with or accounted for in RH SIP revisions.

Section 10.5.3 Outdoor Hydronic Heaters

MDEP includes pending regulations to deal with outdoor wood-fired boilers (see page 129, Section 10.5.3 Regulation of Outdoor Hydronic Heaters). We recommend MDEP update this section, since regulations should be on the books at this time (draft SIP states by September 2008), and include the State’s intention to submit these regulations as a part of the regional haze SIP.

Section 10.8 Enforceability of Long Term Strategy Control Measures

It would help in our evaluation of the SIP if MDEP would explicitly state which “expected” LTS components in Section 10 are currently enforceable and which are being evaluated for the 2013 progress report.