## **Appendix F-3: EPA/FLM/Stakeholder Outreach and Presentations: F-3i - F-3o**

#### **Table of Contents**

Appendix F-3a - Consultation Record	3
Appendix F-3b - National Regional Haze Meeting Denver, Colorado December 5-7, 2017	5
Appendix F-3c - Presentation to FLMs, EPA Region 4 CC/TAWG, January 31, 2018	20
Appendix F-3d - VISTAS Call with FLMs August 1, 2018	23
Appendix F-3e - VISTAS Presentation to other RPOs, September 5, 2018	28
Appendix F-3f - VISTAS Regional Haze Project Update, June 3, 2019	32
Appendix F-3g - VISTAS Regional Haze Meeting, St. Louis, MO, October 28-30, 2019	60
Appendix F-3h - VISTAS Regional Haze Project Update, April 2, 2020	84
Appendix F-3i - VISTAS Presentation to MJOs, April 21, 2020	104
Appendix F-3j - VISTAS Regional Haze Project Update to FLMs, EPA OAQPS, Region 3, Region 4, MJOs May 11, 2020	125
Appendix F-3k - VISTAS Regional Haze Project Update Stakeholder Briefing May 20, 2020	160
Appendix F-31 - VISTAS Regional Haze Project Update to EPA Region 3, Region 4, and OAQPS -July 30, 2020	193
Appendix F-3m - VISTAS Regional Haze Project Update, August 4, 2020	202
Appendix F-3n - EPA Region 4 Fall 2020 Air Director's Meeting-Regional Haze Update Octo 26, 2020	
Appendix F-3o - FLM Consultation Letters December 14, 2022	.217

### Appendix F-3i - VISTAS Presentation to MJOs, April 21, 2020

#### VISTAS Regional Haze Project Update



Regional Planning Organization Briefing April 21, 2020

#### Initial VISTAS Emissions Updates

- Used EPA's 2011 base year emissions without change
- Updated EPA's Initial 2028 projection year emissions
  - EGU and major non-EGU sources
  - Removed Clean Power Plan assumptions
  - VISTAS Adjusted for changes in fuels and facility operating plans
  - Non-VISTAS Used ERTAC 2.7opt



#### Outline

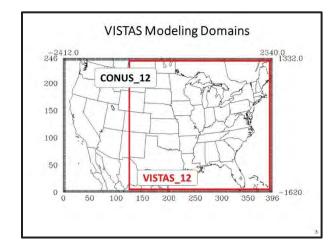
- Background Information
- 2028 Emissions Updates
- Revised 2028 PSAT Stacked Bar Charts
- Four Factor Analysis
- Next Steps & Schedule



#### VISTAS vs. EPA Updated 2028 Emission Projections

 The table below compares the 2028 point emissions used by VISTAS vs. the latest 2028fh emissions used by EPA (projected from 2016). The emissions below are extracted from the VISTAS 12 modeling domain which covers the Eastern U.S.

Pollutant	VISTAS 2028 (tpy)	New EPA 2028 (tpy)	Change (tpy)	Change (%)
NOx	2,641,463.83	2,108,115.50	533,348.33	20.19%
SO2	2,574,542.02	1,400,287.10	1,174,254.92	45.61%



SO2	16.0_2028	2.7opt_2028	∆ SO2	∆ SO2
CENSARA	367,683.7	760,828.2	-393,144.5	-51.67%
LADCO	266,047.0	379,577.5	-113,530.5	-29.91%
MANE-VU	78,657.0	196,672.6	-118,015.6	-60.01%
VISTAS	161,502.5	273,582.1	-112,079.6	-40.97%
TOTAL	976,471.2	1,783,376.5	-806,905.3	-45.25%
NOx	16.0_2028	2.7opt_2028	ΔΝΟχ	ΔΝΟχ
CENSARA	244,499.3	354,795.1	-110,295.8	-31.09%
LADCO	166,429.4	198,966.9	-32,537.4	-16.35%
MANE-VU	56,315.3	83,432.5	-27,117.2	-32.50%
VISTAS	200,791.1	270,615.7	-69,824.6	-25.80%
TOTAL	840,973.6	1,166,663.1	-325,689.5	-27.92%

#### VISTAS CC/TAWG Conclusions

- 1. 2028 emission updates are necessary
  - VISTAS States States will:
    - Update 2028 major source emissions projections (SO $_2$ , NOx, PM $_2$ .5, PM $_1$ 0, NH $_3$ , CO) at the facility and unit level
    - · Add any new sources of significance
  - LADCO States SESARM will:
  - Replace ERTAC\_2.7 with ERTAC\_16.1 based on LADCO input
  - All Other States SESARM will:
    - Replace ERTAC\_2.7 with ERTAC\_16.0
    - Verify accuracy of large SO<sub>2</sub> and NOx source emissions projections via contact with surrounding states/RPOs and update emissions as needed
- 2. Additional 2028 air quality modeling is needed

State/ RPO	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpy)	Delta (%)
AL	87,111.28	59,056.98	32.2%	15,480.96	8,365.96	46.0%	71,630.32	50,691.02	29.2%
FL	63,501.23	52,982.68	-16.6%	28,547.41	24,004.67	-15.9%	34,953.82	28,978.01	-17,196
GA.	37,065.83	36,166.09	-2.4%	18,473.28	17,573.54	4.9%	18,592.55	18,592.55	0.0%
KY	75,140.26	65,636.83	-12.6%	56,262.06	49,585.95	11.9%	18,878.20	16,050.88	-15.0%
MS	21,234.31	8,405.06	-60.4%	6,984.57	3,236.28	-53.7%	14,249.74	5,168.78	-63.7%
NC	35,232.88	24,347.18	-30.9%	19,734.80	9,571.47	-51.5%	15,498.08	14,775.71	-4.7%
SC	29,600.85	29,601,25	D.096	10,693.79	10,695.34	0.0%	18,907.05	18,905.91	0.0%
TN	23,447.58	21,057.17	-10.2%	12,114.30	10,030.04	17.2%	11,333.28	11,027.13	-2.7%
VA	19,839,18	18,551.32	-6.5%	3,264.09	1,976.23	-39,5%	16,575.09	16,575.09	0.0%
WV	63,404.07	53,715.79	-15,3%	57,828.57	47,744.49	-17,4%	5,575.41	5,971.30	7.1%
ENSARA	1.012,946.59	621,321.29	-38.7%	773.625.13	382,000.54	-50.6%	239,321.46	239,320.75	0.0%
LADCO	660,186.42	498,171.62	24.5%	444,506.99	282,492.18	35.4%	215,679.44	215,679.44	0.0%
MANE-VU	270,810,83	149,439.76	-44.8%	203,661.43	95,074.20	-53,3%	67,149.39	54,365,55	-19.0%
WRAP	182,121.89	135,483.18	-25.6%	136,955.17	90,316.46	-34.1%	45,166.72	45,166.73	0.0%
TOTAL	2,581,643.20	1,773,936.20	-31.3%	1,788,132.63	1,032,667.35	-42.2%	793,510.56	741,268.85	-6.6%

#### Additional Modeling-Related Tasks

- · Emissions processing
- Updated 2028 CAMx modeling (VISTAS\_12)
- Updated 2028 visibility projections
- Documentation

State/ RPO	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpy)	Delta (%)
AL	80,389,97	70,824,72	-11.996	26.895.35	20.008.14	25.6%	53,494.61	50,816,58	5.0%
FL	68,006,19	70,010.40	2.9%	26,250,73	25.049.90	-4.6%	41.755.45	44,960,50	7.7%
GA	67,197.50	65,885.55	-2.096	25,899.67	24,587.73	-5.196	41,297.83	41,297.83	0.0%
KY	66,240.03	62,130.83	-6.2%	36,781.72	32,695.94	11.1%	29,458.31	29,434.89	0.1%
MS	52,159.32	46,853.62	-10.2%	18,279.53	12,208.89	33.2%	33,879.79	34,644.73	2.3%
NC	65,863.97	58,933.80	-10.5%	27,842.23	20,977.65	-24,7%	38,021.74	37,956.15	-D.2%
SC	36,051.31	36,170.87	0.3%	10,522.78	10,707.42	1.8%	25,528.53	25,463.44	-0.3%
TN	45,879.07	42,954.25	6.4%	10,086.01	7,814.13	-22:5%	35,793.06	35,140.12	-1.8%
VA	43,210.19	41,671.99	-3.6%	11,973.97	10,435.77	-12.8%	31,236.22	31,236.22	0.0%
WV	65,054.07	58,200.77	4.8%	46,721,77	49,874.15	6.7%	18,332.30	18,325.62	0.0%
CENSARA	903,979.85	791,397.59	-12.5%	382,706.66	270,182.46	-29.4%	521,273.19	521,215.14	0.0%
LADCO	548,866.74	491,345.00	10.5%	244,035.26	186,513.52	23.6%	304,831.49	304,831.49	0.0%
VIANE-VU	244,280,15	222,991.41	-8.7%	103,465.15	82,176.41	-20,6%	140,815.00	140,815.00	0.0%
WRAP	362,819.80	301,433.41	-16.9%	187,944.97	126,558.55	-32.7%	174,874.83	174,874.86	0.0%
TOTAL	2,649,998.14	2,370,804.22	-10.5%	1,159,405.80	879,790.66	-24.1%	1,490,592.35	1,491,013.55	0.0%

## Updated 2028 Point Emissions

Revised 2028 PSAT Stacked Bar Charts (Original and Adjusted)

#### **PSAT Source Apportionment Modeling**

- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- · Used for further evaluation of AOI results
- · Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission
- VISTAS contract with ERG allows for up to 250 tags

Revised State/RPO PSAT Results

 Revised EGU Sulfate PSAT Results = Original EGU Sulfate PSAT Results \* SO, EGU Ratio

(Revised EGU SO<sub>2</sub> emissions) where, SO<sub>2</sub> EGU Ratio = (Original EGU SO<sub>2</sub> emissions)

 Revised NEGU Sulfate PSAT Results = Original NEGU Sulfate PSAT Results \* SO, NEGU Ratio

(Revised NEGU SO<sub>2</sub> emissions) where, SO, NEGU Ratio = (Original NEGU SO<sub>2</sub> emissions)

#### PSAT SO<sub>2</sub> and NOx Tags (209)

#### Round 1 (122 tags)

- Total  $SO_2$  tags for 10 individual VISTAS states + 3 RPOs = 13 tags Total  $SO_2$  tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

#### Round 2 (87 tags)

- Non-EGU point SO<sub>2</sub> for 10 individual VISTAS states + 3 RPOs = 13 tags
- Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO2 and NOx for N/S/W/E boundaries = 8 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 10 tags
- NOx tags for individual VISTAS facilities = 16 tags
- SO<sub>2</sub> tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags

#### Revised State/RPO PSAT Results

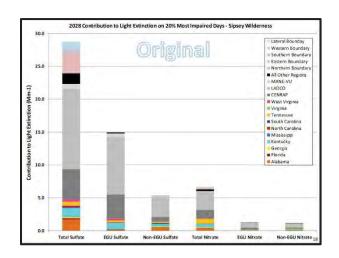
 Revised EGU Nitrate PSAT Results = Original EGU Nitrate PSAT Results \* NOx EGU Ratio

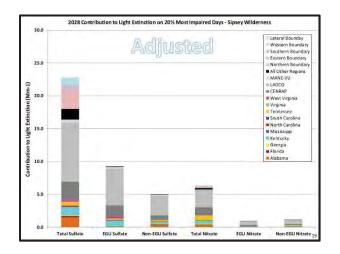
(Revised EGU NOx emissions) where, NOx EGU Ratio = (Original EGU NOx emissions)

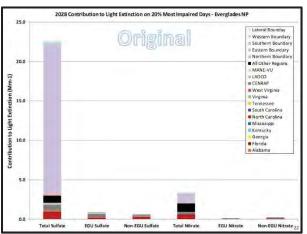
 Revised NEGU Nitrate PSAT Results = Original NEGU Nitrate PSAT Results \* NOx NEGU Ratio

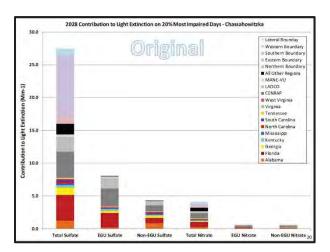
(Revised NEGU NOx emissions) where, NOx NEGU Ratio = (Original NEGU NOx emissions)

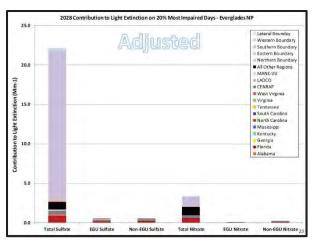
**PSAT Adjustment Ratios** SO, EGU SO, NEGU NOx EGU **NOx NEGU** State/RPO Ratio Ratio Ratio Ratio AL 0.951 GA 1.000 1.000 KY 0.850 0.881 0.889 MS NC SC 0.997 0.828 0.973 TN VA 0.605 1.000 1.000 wv 0.826 1.000 CENSARA 0.494 1.000 1 000 LADCO 0.764 1.000 MANE-VU 0.467 1.000

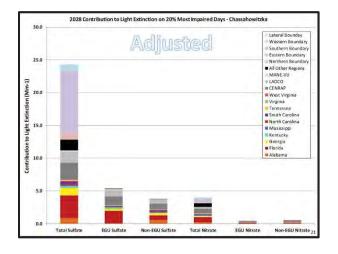


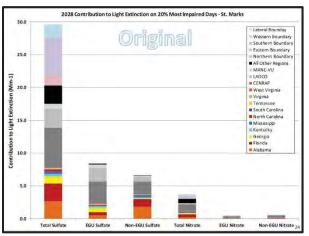


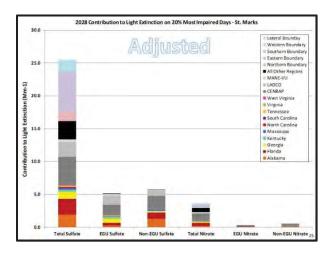


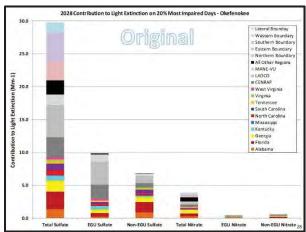


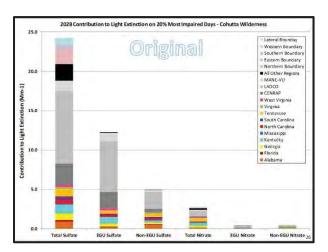


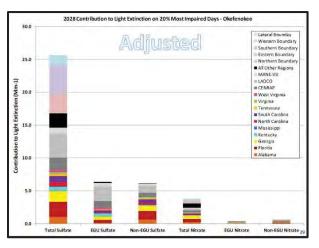


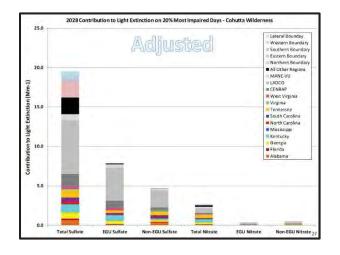


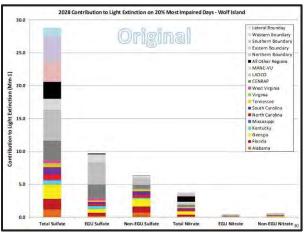


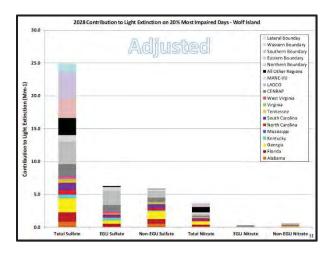


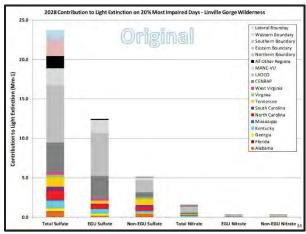


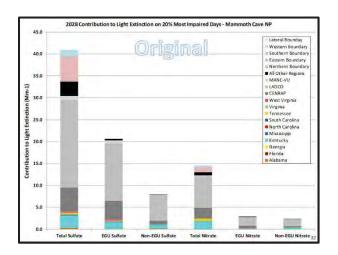


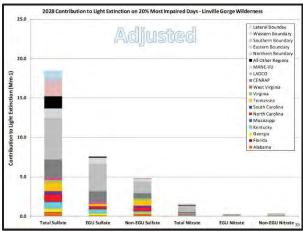


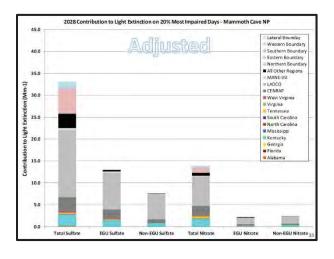


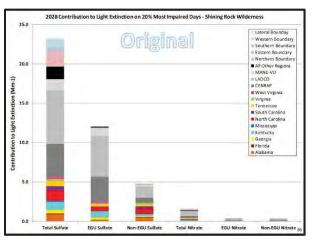


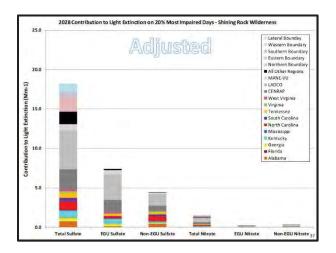


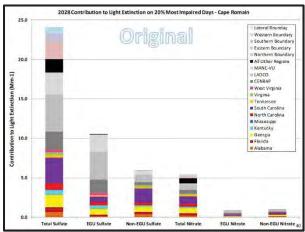


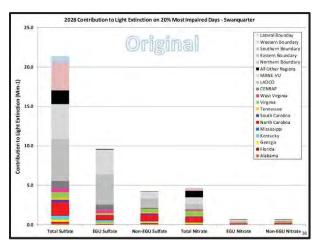


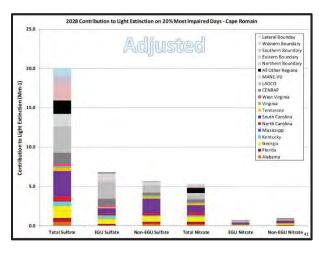


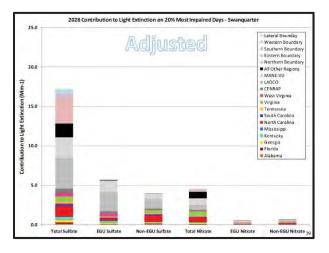


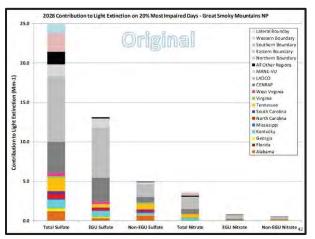


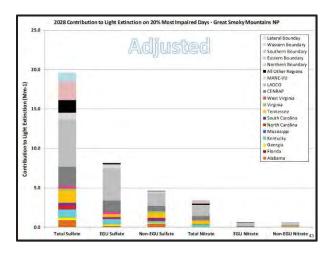


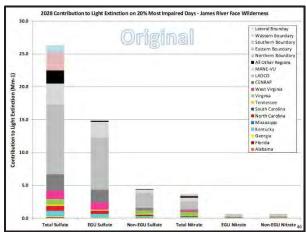


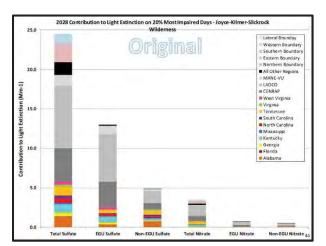


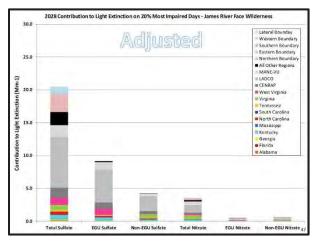


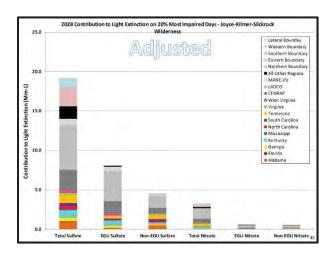


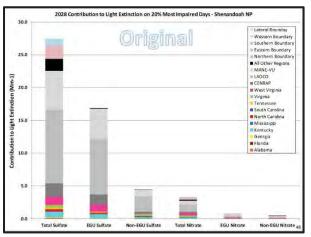


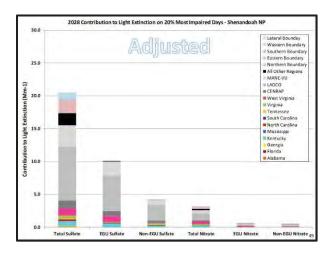


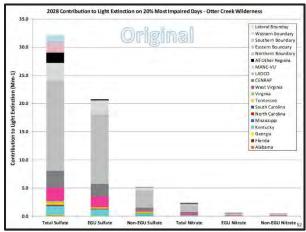


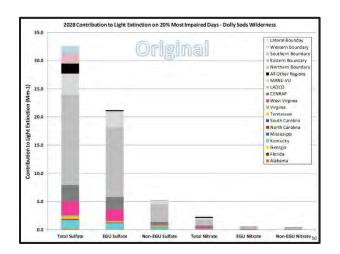


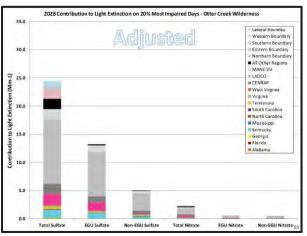


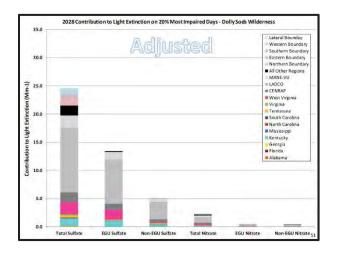


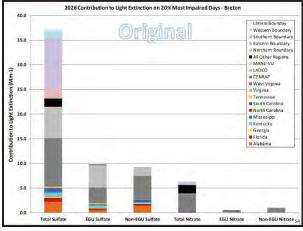


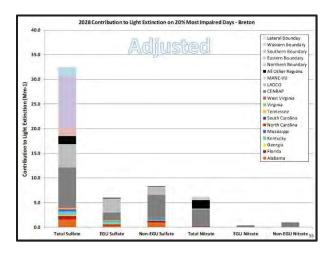


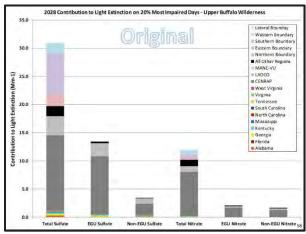


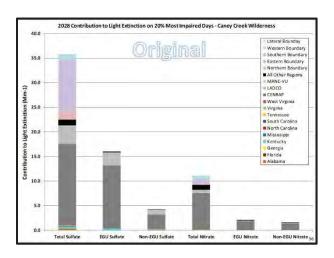


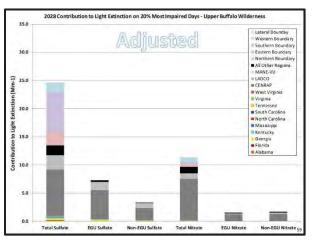


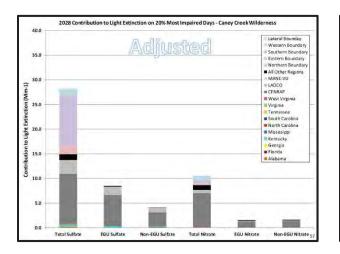


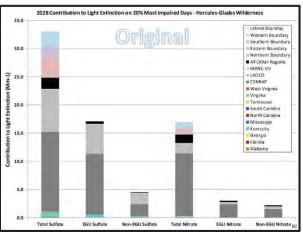


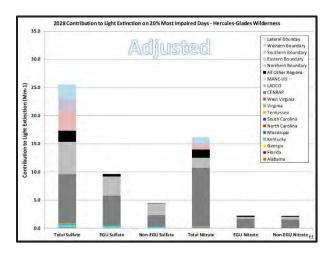


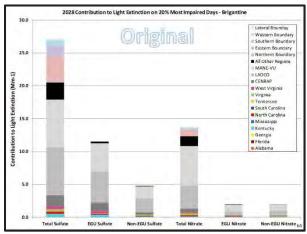


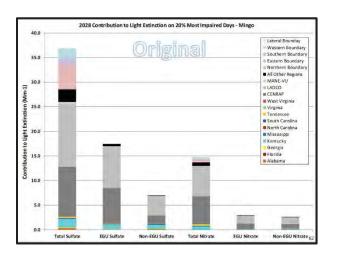


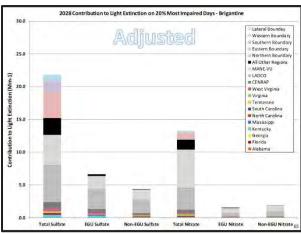


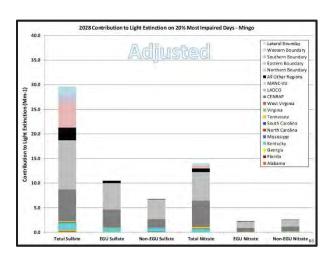














#### Four-Factor Analysis Screening Approach

- The VISTAS four-factor analysis approach is based on an initial AOI screening (Q/d \* EWRT) to rank facilities based on their sulfate and nitrate contributions at each Class I area.
- These rankings were used to identify 87 individual facilities for PSAT tagging. PSAT tagging was used to determine the nitrate and sulfate contributions from each facility at each Class I area in the VISTAS\_12 domain.
- 3. Each individual VISTAS state will apply a PSAT contribution threshold based on the facility sulfate and facility nitrate impacts (separately, not combined) divided by the total impact of sulfate + nitrate from all point sources to determine which sources may need to be considered for a four-factor analysis.
  - If sulfate contribution ≥ 1.00% → SO<sub>2</sub> Four-Factor Analysis
  - If nitrate contribution ≥ 1.00% → NOx Four-Factor Analysis

67

#### Area of Influence (AOI) Analysis

- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: (Q/d)\*EWRT
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the 4-factor analysis
- Georgia Example:
  - Sources in Georgia, used ≥ 2% threshold
  - Sources outside Georgia, used ≥ 4% threshold

#### Why 1% Threshold?

- In the Round 1 Regional Haze SIPs, many VISTAS states used the AOI approach and a 1% threshold on a Unit basis.
  - We are using the AOI/PSAT approach and a ≥ 1.00% PSAT threshold based on a Facility basis.
  - This will pull in more facilities compared to a Unit basis.
- This approach results in a reasonable number of sources that can be evaluated with limited state resources and focuses on the sources with the largest impacts.

#### AOI Point Contributions for COHU

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	502_2028 (tons/year)	NOx Contribution	SO2 Contributio
GA	Ga Power Company - Plant Bowen	78.0	6,643.3	10,453.4	1.15%	19,58%
1N	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	410.1	8,806,8	30,536.3	0.13%	4,68%
GA	International Paper – Rome	87.4	1,773.4	1,791.0	0.18%	4.66%
IN	Gibson	487.1	12,280.3	23.117.2	0.10%	2.31%
IN	INDIANAPOLIS POWER & LIGHT PETERSBURG	477.0	10,665.3	18,141.9	0.16%	2.18%
KY	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	457.2	7,007.3	19,504.7	0.07%	2.18%
TN	TVA KINGSTON FOSSIL PLANT	124.0	1,687.4	1,886,1	0.13%	2,17%
OH	General James M. Gavin Power Plant (0627010056)	512.0	8,122.5	41,595.8	0.02%	1.71%
TN	TVA CUMBERLAND FOSSILPLANT	327.0	4,916.5	8,427.3	0.09%	1.38%
KY	Big Rivers Electric Corp - Wilson Station	369.0	1,151:9	6,934.2	0.01%	1:07%
OH	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	454.6	7,150.0	22,133.9	0.06%	1/05%
GA	Ga Power Company - Plant Wansley	156.8	2,052.5	4,856.0	0.04%	1.05%
KY	KY Utilities Co- Ghent Station	441.5	7,939.9	10,169.3	0.08%	1.05%
11	Joppa Steam	466.9	4,706.3	20,509.3	0.02%	1.04%
GA	Mohawk Industries Inc	32.0	66.5	77.1	0.07%	1.02%
TN	EASTMAN CHEMICAL COMPANY	269.8	6,900.3	6,420.2	0.09%	0,99%
MO	AMEREN MISSOURI-LABADIE PLANT	695.4	9,685.5	41,740.3	0.01%	0.96%
IL	Newton	564.0	1,934.9	10,631.6	0.01%	0.91%
GA	Chemical Products Corporation	71.9	19.5	513.8	0.00%	0.89%
IN	INDIANA KENTUCKY ELECTRIC CORPORATION	444.4	6,188.5	9,038.1	0.04%	0.76%

**HYSPLIT Trajectories** 

- Trajectories were run using NAM-12 meteorology for the 20% most impaired days in 2011-2016 at 44 Class I areas.
  - Trajectories were run with starting heights of 100, 500, 1,000, and 1,500 meters.
  - Trajectories were run 72 hours backwards in time for each height at each location.
  - Trajectories were run with start times of 12AM (midnight of the start of the day), 6AM, 12PM, 6PM, and 12AM (midnight at the end of the day) local time.
- 44 Class I areas x 6 years x 24 days/year x 4 heights x 5 start times = 126,720 trajectories

AOI Point Contributions for OKEF

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	502_2028 (tons/year)	NOx Contribution	SO2 Contribution
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	71.5	112.4	2,745.0	0.03%	14.639.
FL	ROCKTENN CP. LLC	64.8	2,316.8	2,606.7	0.88%	12,879
FL	JEA	65.6	651.8	2,094.5	0.18%	6.60%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	121.4	917.8	3,713.4	D.07%	3.25%
FL	IFF CHEMICAL HOLDINGS, INC.	56.8	37.7	898.9	0.01%	3.25%
FL	RAYONIER PERFORMANCE FIBERS LLC	63.4	2,327.1	562.0	0.90%	2.82%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	0.08%	2.81%
FL	BUCKEYE FLORIDA, UMITED PARTNERSHIP	153.5	1,830.7	1,520.4	0.14%	2.18%
FL	RENESSENZILIC	59.8	66.3	569.5	0.02%	1.96%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.8	5,306.4	0.06%	1,40%
AL	Sanders Lead Co	384.6	121.7	7,951,1	0.00%	1.11%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	197.2	351.5	1,860.2	0.01%	1.05%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.05%	1.02%
GA	Brunswick Cellulose Inc	75.3	1,554.5	294.2	0.34%	1.01%
SC	ALUMAX OF SOUTH CAROLINA	322.7	108.1	3,751.7	0.00%	0.97%
GA	PCA Valdosta Mill	112.7	1,032.6	485.7	0.09%	0.85%
SC	SANTEE COOPER CROSS GENERATING STATION	348.1	3,273.5	4,281.2	0.05%	0.85%
FL	CITY OF GAINESVILLE, GRU	111.7	410.0	881.4	0.03%	0.79%
5C	KAPSTONE CHARLESTON KRAFT LLC	314.9	2,355.8	1,863.7	0.06%	0.65%
GA	Ga Power Company - Plant Wansley	403.7	2,052.5	4,856.0	0.02%	0.65%

#### AOI Point Contributions for WOLF | OSTANCE | NO., 2028 | 302, 2029 | NOx | S02 | (form/year) | (tenn/year) | Contribution State FAC GA Brunswick Cellulose Inc FL ROCK TENN CP. LLC GA International Paper - Savannah GA international Pages - Savonach RE 24 GA Geoggie Pacific Consumer Products IP (Savannach Biver M8) R. VAMES SURVINGA GENIZUTURAL CHEMICALS/INC SC ALDMAN OF SOUTH CAROLINA R. PANONIES PROSINGA GENIZUTURAL CHEMICALS/INC SC SURVINGA GENIZUTURAL CHEMICALS/INC GA POWER COMPANY - PRAIT BOWER SAVANDA SOUTH CHEMICALS CHEMICALS CHEMICALS SC SURVINGA SOUTH CHEMICALS CHEMICALS CHEMICALS SC SURVINGA SOUTH CHEMICALS CHEMICALS SC SURVINGA GENIZUTURAL CHEMICALS CHEMICALS SC SURVINGA SOUTH CHEMICALS CHEMICALS SC SURVINGA CHEMICALS CHEMICALS 2,489.8 5,306.4 6,643.3 10,453.4 521.6 582.0 1,780.3 3,212.9 72.2 30.1 2,355.8 1,963.7 288.7 27.1 213.6

#### **PSAT Source Apportionment Modeling**

- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- · Used for further evaluation of AOI results
- · Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission
- VISTAS contract with ERG allows for up to 250 tags

#### Georgia Tagging for PSAT

#### Sources in Georgia (≥ 2% threshold)

- Ga Power Company Plant Bowen
- International Paper Rome (aka TEMPLE INLAND)
- International Paper Savannah
- · Brunswick Cellulose Inc
- · Georgia-Pacific Consumer Products LP (Savannah River Mill)

#### • Sources outside Georgia (≥ 4% threshold)

- INDIANA MICHIGAN POWER DBA AEP ROCKPORT (IN)
- · ROCK TENN CP, LLC (FL)
- · JEA (FL)

PSAT SO<sub>2</sub> and NOx Tags (209)

#### Round 1 (122 tags)

- Total SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
   Total NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point  $SO_2$  tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

- Round 2 (87 tags)
   Non-EGU point SO<sub>2</sub> for 10 individual VISTAS states + 3 RPOs = 13 tags
   Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO, and NOx for N/S/W/E boundaries = 8 tags
- SO, tags for individual VISTAS facilities = 10 tags
- NOx tags for individual VISTAS facilities = 16 tags SO<sub>2</sub> tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags
- → 87 Total Facility Tags (both SO₂ and NOx)

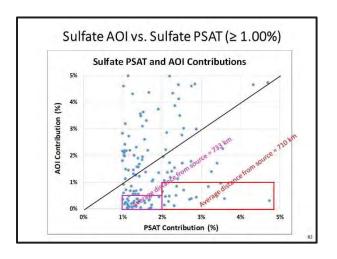
#### **AOI Screening Summary**

State	Threshold	Notes
AL	2%	Sulfate only
FL	5%	Sulfate or nitrate, plus Gulf Crist, Mosaic Bartow, Mosaic New Wales, and Mosaic Riverview
GA	2% - 4%	Sulfate or nitrate, 2% threshold for GA facilities, 4% threshold for facilities outside GA
KY	2%	Sulfate or nitrate
MS	2%	Sulfate or nitrate
NC	3%	Sulfate + nitrate
sc	2% - 5%	2% for sulfate, 5% for nitrate, plus Santee Cooper Winyah, International Paper Georgetown, and SCE&G Williams
TN	3%	Sulfate + nitrate, plus CEMEX
VA	2%	Sulfate + nitrate
WV	0.2%	Sulfate or nitrate

Facility Tags (AL, FL, GA)

Facility State	Facility RPO	FACILITY ID STD	FACILITY_NAME_STD	SO2 (TPY)	NOx (TPY)
AL	VISTAS	01097-949811	Akzo Nobel Chemicals Inc	3,335.72	20.7
AL	VISTAS	01097-1056111	Ala Power - Barry	6,033.17	2,275.7
AL	VISTAS	01129-1028711	American Midstream Chatom, LLC	3,106.38	425.8
AL	VISTAS	01073-1018711	DRUMMOND COMPANY, INC.	2,562.17	1,228.5
AL	VISTAS	01053-7440211	Escambia Operating Company LLC	18,974.39	349.3
AL	VISTAS	01053-985111	Escambia Operating Company LLC	8,589.60	149.6
AL	VISTAS	01103-1000011	Nucor Steel Decatur LLC	170.23	331.2
AL	VISTAS	01109-985711	Sanders Lead Co	7,951.06	121.7
AL	VISTAS	01097-1061611	Union Oil of California - Chunchula Gas Plant	2,573.15	349.2
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1,520.42	1,830.7
FL	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS FL. LLC.	29.51	910.3
FL	VISTAS	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	5,306.41	2,489.8
FL	VISTAS	12086-900011	FLORIDA POWER & LIGHT (PTF)	13.05	170.6
FL	VISTAS	12033-752711	GULF POWER - Crist	2,615.65	2,998.3
FL	VISTAS	12086-3532711	HOMESTEAD CITY UTILITIES	0.00	97.0
FL	VISTAS	12031-640211	JEA	2,094.48	651.7
FL	VISTAS	12105-717711	MOSAIC FERTILIZER LLC	7,900.67	310.4
FL	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	3,034.06	159.7
FL	VISTAS	12105-919811	MOSAIC FERTILIZER, LLC	4,425.56	141.0
FL	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	561.97	2,327.1
FL	VISTAS	12089-753711	ROCK TENN CP, LLC	2,606.72	2,316.7
FL	VISTAS	12005-535411	ROCKTENN CP LLC	2,590.88	1,404.8
FL	VISTAS	12129-2731711	TALLAHASSEE CITY PURDOM GENERATING STA.	2.86	121.4
FL	VISTAS	12057-538611	TAMPA ELECTRIC COMPANY (TEC)	6,084.90	2,665.0
FL	VISTAS	12086-899911	TARMAC AMERICA LLC	9.38	879.7
FL	VISTAS	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	3,197.77	112.4
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	294.20	1,554.5
GA	VISTAS	13015-2813011	Ga Power Company - Plant Bowen	10,453.41	6,643.3
GA	VISTAS	13103-536311	Georgia-Pacific Consumer Products LP (Savannah River Mill)	1,860.18	351.5
GA	VISTAS	13051-3679811	International Paper – Savannah	3,945.38	1,560.7
GA	VISTAS	13115-539311	TEMPLE INLAND	1,791.00	1,773.3

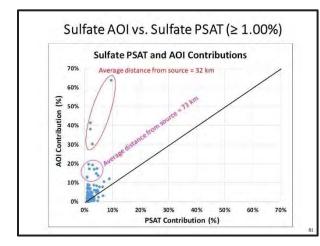
NOx (TPY)	SO2 (TPY)	FACILITY NAME STD	FACILITY ID STD	Facility RPO	Facility State
1,151.5	6,934.16	Big Rivers Electric Corp - Wilson Station	21183-5561611	VISTAS	KY
197.0	5,044.16	Century Aluminum of KY LLC	21091-7352411	VISTAS	KY
3,114.5	3,011.01	Tennessee Valley Authority - Paradise Fossil Plant	21177-5196711	VISTAS	KY
7,007.3	19,504.75	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	21145-6037011	VISTAS	KY
1,534.3	741.60	Chevron Products Company, Pascagoula Refinery	28059-8384311	VISTAS	MS
3,829.7	231.92	Mississippi Power Company, Plant Victor J Daniel	28059-6251011	VISTAS	MS
2,992.3	1,127.07	Blue Ridge Paper Products - Canton Mill	37087-7920511	VISTAS	NC
1.796.4	687.45	Domtar Paper Company, LLC	37117-8049311	VISTAS	NC
7,511.3	4,139.21	Duke Energy Carolinas, LLC - Marshall Steam Station	37035-8370411	VISTAS	NC
495.5	4,845.90	PCS Phosphate Company, Inc Aurora	37013-8479311	VISTAS	NC
21.6	261.64	SGL Carbon LLC	37023-8513011	VISTAS	NC
108.0	3,751.69	ALUMAX OF SOUTH CAROLINA	45015-4834911	VISTAS	SC
2.031.2	2,767.52	INTERNATIONAL PAPER GEORGETOWN MILL	45043-5698611	VISTAS	SC
2,355.8	1,863,65	KAPSTONE CHARLESTON KRAFT LLC	45019-4973611	VISTAS	SC
3,273.4	4,281.17	SANTEE COOPER CROSS GENERATING STATION	45015-4120411	VISTAS	SC
1,772.5	2,246.86	SANTEE COOPER WINYAH GENERATING STATION	45043-6652811	VISTAS	SC
992.7	392.48	SCE&G WILLIAMS	45015-8306711	VISTAS	SC
711.5	121,47	Cemex - Knoxville Plant	47093-4979911	VISTAS	TN
6,900.3	6,420.16	EASTMAN CHEMICAL COMPANY	47163-3982311	VISTAS	TN
883.2	472.76	TATE & LYLE, Loudon	47105-4129211	VISTAS	TN
964.1	622.54	TVA BULL RUN FOSSIL PLANT	47001-6196011	VISTAS	TN
4,916.5	8,427.33	TVA CUMBERLAND FOSSIL PLANT	47161-4979311	VISTAS	TN
1,687,3	1,886.09	TVA KINGSTON FOSSIL PLANT	47145-4979111	VISTAS	TN
520.1	5,090.95	Jewell Coke Company LLP	51027-4034811	VISTAS	VA
1.985.6	2.115.31	Meadwestvaco Packaging Resource Group	51580-5798711	VISTAS	VA
1,972,9	2,290,17	Roanoke Cement Company	51023-5039811	VISTAS	VA



Facility State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 (TPY)	NOx (TPY)
wv	VISTAS	54033-6271711	ALLEGHENY ENERGY SUPPLY CO. LLC-HARRISON	10,082.94	11.830.8
wv	VISTAS	54049-4864511	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	2,210.25	1,245.1
WV	VISTAS	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	10,984,24	4,878.1
wv	VISTAS	54023-6257011	Dominion Resources, Inc MOUNT STORM POWER STATION	2,123.64	1,984.1
WV	VISTAS	54041-6900311	EQUITRANS - COPLEY RUN CS 70	0.10	511.0
WV	VISTAS	54083-6790711	FILES CREEK 6C4340	0.15	643.3
wv	VISTAS	54083-6790511	GLADY 6C4350	0.11	343.2
wv	VISTAS	54093-6327811	KINGSFORD MANUFACTURING COMPANY	16.96	140.8
wv	VISTAS	54061-16320111	LONGVIEW POWER	2,313.73	1,556.5
wv	VISTAS	54051-6902311	MITCHELL PLANT	5,372.40	2,719.6
wv	VISTAS	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	4,881.87	13,743.3
wv	VISTAS	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	16,817.43	5,497.3
wv	VISTAS	54061-6773811	MORGANTOWN ENERGY ASSOCIATES	828.64	655.5
AR	CENRAP	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	32,050.48	14,133.1
MO	CENRAP	29143-5363811	NEW MADRID POWER PLANT-MARSTON	16,783.71	4,394.1
MD	MANE-VU	24001-7763811	Luke Paper Company	22,659.84	3,607.0
PA	MANE-VU	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	56,939.25	6,578.4
PA	MANE-VU	42063-3005211	HOMER CITY GEN LP/ CENTER TWP	11,865.70	5,215.9
PA	MANE-VU	42063-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	8,880.26	2,254.6
IL	Midwest RPO	17127-7808911	Joppa Steam	20,509.28	4,706.3
IN	Midwest RPO	18173-8183111	Alcoa Warrick Power Plt Agc Div of AL	5,071.28	11,158.5
IN	Midwest RPO	18051-7363111	Gibson	23,117.23	12,280.3
IN	Midwest RPO	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	30,536.33	8,806.7
IN	MIdwest RPO	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	18,141.88	10,665.2
IN	MidwestRPO	18129-8166111	Sigeco AB Brown South Indiana Gas & Ele	7,644.70	1,578.5
OH	Midwest RPO	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	7,460.79	2,467.3
OH	Midwest RPO	39031-8010811	Conesville Power Plant (0616000000)	6,356.23	9,957.8
ОН	Midwest RPO	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	22,133.90	7,149.9
ОН	Midwest RPO	39053-8148511	General James M. Gavin Power Plant (0627010056)	41,595.81	8,122.5
OH	Midwest RPO	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	3,400.14	9,143.8

#### AOI vs. PSAT Summary

- AOI tends to overestimate impacts for facilities near the Class I area.
- AOI tends to underestimate impacts for facilities far away from the Class I area.
  - AOI uses 72-hour back trajectories, sulfate can last for weeks and travel hundreds to thousands of km.
- PSAT is the most reliable modeling tool for tracking facility contributions to visibility impairment at Class I areas.



#### Four-Factor Analysis Screening Approach

- The updated 2028 CAMx modeling will impact the <u>total</u> sulfate and total nitrate impacts from all sources at each Class I area since the SO<sub>2</sub> and NOx emissions have decreased.
- However, the <u>individual</u> sulfate and total nitrate impacts from the individual 87 tagged facilities should not change unless a facility has reduced or increased SO<sub>2</sub> and/or NOx emissions.
- Therefore, the percent contribution (facility sulfate impact/total impact of all point sources of sulfate + nitrate) will increase since the denominator will decrease; however, the order of the rankings from largest impact to smallest impact should not change unless one of those facilities reduced or increased emissions.

#### Four-Factor Analysis Screening Approach

- Due to the amount of resources already invested in the AOI and PSAT analysis, VISTAS plans to continue with our original approach for determining which sources will require a four-factor analysis.
- In cases where emissions decreased or increased at individual facilities being considered for a fourfactor analysis, the facility contributions will be adjusted to be consistent with the lower/higher facility emissions before comparing to the PSAT contribution threshold.
- EPA verbally stated this should be okay 2/6/2020.

Revised Facility Nitrate PSAT Results

Revised Facility Nitrate PSAT Results
 = Original Facility Nitrate PSAT Results
 \* NOx Ratio\_Facility \* Ratio\_Class\_I\_Area

(Revised sulfate + nitrate point contribution)

#### Original Facility PSAT Contributions

Original Facility Sulfate PSAT Contributions (%)
 Facility Sulfate PSAT Contributions (Mm<sup>-1</sup>)

Total Sulfate + Nitrate Point Contribution (Mm<sup>-1</sup>)

Original Facility Nitrate PSAT Contributions (%)
 Facility Nitrate PSAT Contributions (Mm<sup>-1</sup>)

Total Sulfate + Nitrate Point Contribution (Mm<sup>-1</sup>)

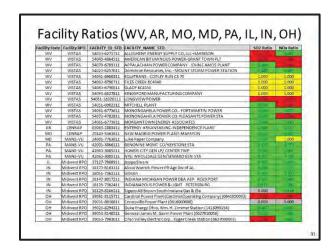
acility State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 Ratio	NOx Ratio
AL	VISTAS	01097-949811	Akzo Nobel Chemicals Inc	1.000	1.000
AL	VISTAS	01097-1056111	Ala Power-Barry	100	1,000
AL.	VISTAS	01129-1028711	American Midstream Chatom, U.C.	0.000	0.000
AL	VISTAS	01073-1018711	DRUMMOND COMPANY, INC.	1.000	1,000
AL	VISTAS	01053-7440211	Escambia Operating Company LLC	0.00	1.000
AL	VISTAS	01053-985111	Escambia Operating Company LLC	5.00	0.000
AL	VISTAS	01103-1000011	Nucar Steel Decatur LLC	1.000	1.000
AL	VISTAS	01109-985711	Sanders Lead Co	3.866	1.000
AL	VISTAS	01097-1061611	Union Oil of California - Chunchula Gas Plant	0.000	0,000
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1.000	1.000
FL	VISTAS	12085-900111	CEMEX CONSTRUCTION MATERIALS FL. LLC.	1.000	
FL	VISTAS	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	7.86	Mi
FL	VISTAS	12086-900011	FLORIDA POWER & LIGHT (PTF)	2,000	1.000
FL	VISTAS	12033-752711	GULF POWER-Crist	n <sub>e</sub> m	1.8
FL	VISTAS	12086-3532711	HOMESTEAD CITY UTILITIES	1.000	11000
-FL	VISTAS	12031-640211	JEA	-	
FL	VISTAS	12105-717711	MOSAIC FERTILIZER LLC	2544	1,000
FL	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	10000	
FL	VISTAS	12105-919811	MOSAICTERTILIZER, LLC	6.474	1,000
FL.	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	1.000	1,000
FL	VISTAS	12089-753711	ROCK TENN CP, LLC	1.000	1,000
FL	VISTAS	12005-535411	ROCKTENNEPLLC	1.000	1.000
FL	VISTAS	12129-2731711	TALLAHASSEE CITY PURDOM GENERATING STA.	1.006	1.000
FL	VISTAS	12057-538611	TAMPA ELECTRIC COMPANY (TEC)	1.000	1.000
FL	VISTAS	12086-899911	TARMAC AMERICALLC	1.600	
FL	VISTAS	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	1000	(1909)
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	1.000	1.000
GA	VISTAS	13015-2813011	Ga Power Company - Plant Bowen	1.000	1,000
GA	VISTAS	13103-536311	Georgia-Pacific Consumer Products LP (Savannah River Mill)	1.000	1.000
GA	VISTAS	13051-3679811	InternationalPaper-Savannah	1,000	1,000
GA	VISTAS	13115-539311	TEMPLE INLAND	1.000	1.000

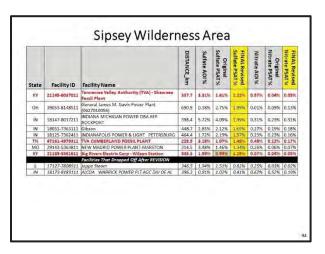
#### Revised Facility Sulfate PSAT Results

Revised Facility Sulfate PSAT Results
 = Original Facility Sulfate PSAT Results
 \* SO<sub>2</sub> Ratio\_Facility \* Ratio\_Class\_I\_Area

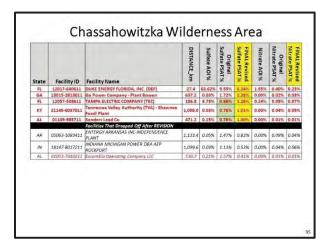
(Revised sulfate + nitrate point contribution)

	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 Ratio	NOx Ratio
KY	VISTAS	21183-5561611	Big Rivers Electric Corp - Wilson Station	1.000	1.000
-KY	VISTAS	21091-7352411	Century Aluminum of KY LLC	100000000	1,000
KY	VISTAS	21177-5196711	Tennessee Valley Authority Paradise Fossil Plant		8748
KY:	VISTAS	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	1.000	1,000
MS	VISTAS	28059-8384311	Cheyron Products Company, Pascagoula Refinery	1.000	1,000
MS	VISTAS	78059-6251011	Mississippi Power Company, Plant Victor J Daniel	1.000	1.000
NC	VISTAS	37087-7920511	Blue Hidge Paper Products - Canton Mill		1.00
NC	VISTAS	37117-8049311	Domtar Paper Company, LLC	1,000	1.000
NC.	VISTAS	37035-8370411	Duke Energy Carolinas, LLC - Marshall Steam Station	100	8711
NC	VISTAS	37013-8479311	PCS Phosphate Company, Inc Aurora	1.000	1.000
NC	VISTAS	37023-8513011	SGL Carbon LLC	1,000	1.000
SC	VISTAS	45015-4834911	ALUMAX OF SOUTH CAROLINA	1.090	1,000
5C	VISTAS	45043-5698611	INTERNATIONAL PAPER GEORGETOWN MILL	1.000	1,000
SC	VISTAS	45019-4973611	KAPSTONE CHARLESTON KRAFT LLC	1.860	1:000
SC.	VISTAS	45015-4120411	SANTEE COOPER CROSS GENERATING STATION	2.000	1.000
50	VISTAS	45043-6652811	SANTEE COOPER WINYAH GENERATING STATION	1.000	1.000
SC	VISTAS	45015-8306711	SCE&G WILLIAMS	1.000	1.000
TN	VISTAS	47093-4979911	Cernex - Knoxville Plant	1.000	1.000
TN	VISTAS	47163-3982311	EASTMAN CHEMICAL COMPANY	2.000	1,000
TN	VISTAS	47105-4129211	TATE & LYLE, Loudon	100	- 30
TN	VISTAS	47001-6196011	TVA BULL RUN FOSSIL PLANT	0.000	0.000
TN	VISTAS	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	1.000	1.000
TN	VISTAS	47145-4979111	TVA KINGSTON FOSSIL PLANT	200	
VA	VISTAS	51027-4034811	Jewell Coke Company LLP	1.000	1.000
VA	VISTAS	51580-5798711	Meadwestvaco Packaging Resource Group	3:000	1.000
VA	VISTAS	51023-5039811	Roanoke Cement Company	1.000	1.000





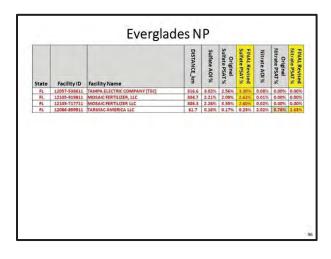


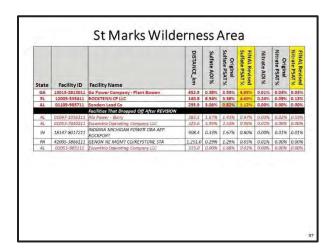


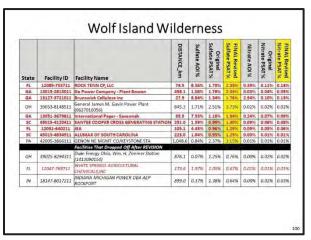
#### **EXAMPLE: New Madrid Power at SIPS**

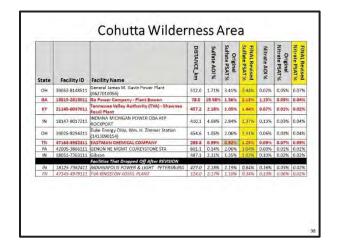
- Revised Facility Sulfate PSAT Results = Original Facility Sulfate PSAT Results \* SO<sub>2</sub> Ratio\_Facility \* Ratio\_Class\_I\_Area
- Original Facility Sulfate PSAT Results = 1.46%
- Revised Facility Sulfate PSAT Results = 1.46% \* 0.665 (slide 91) \* 1.382 (slide 92)

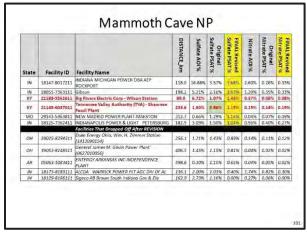
  - = 1.34% (slide 94)

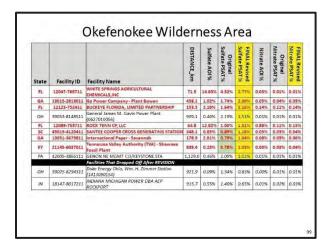


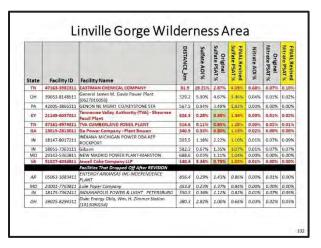




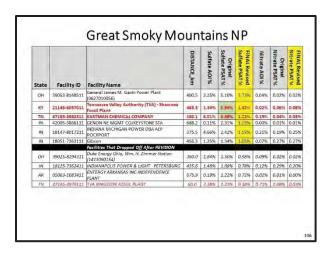


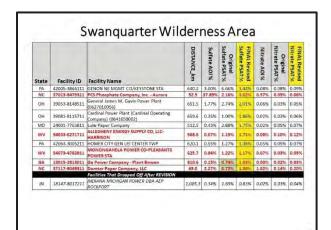


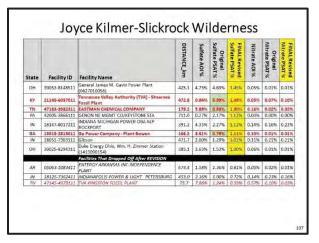


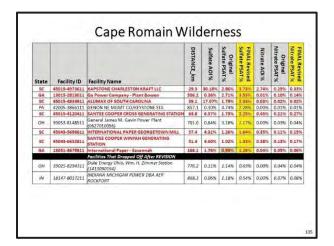


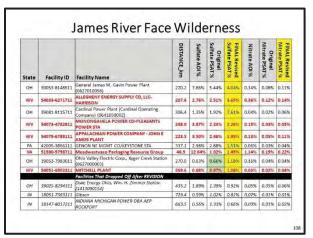
_		Shining Rock Wild	-						
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI%	Original Sulfate PSAT%	FINAL Revised Sulfate PSAT%	Nitrate AOI %	Original Nitrate PSAT%	Nitrate PSAT%
ОН	39053-8148511	General James M. Gavin Power Plant (0627010056)	397.3	1.39%	3.26%	2,41%	0.01%	0.01%	0.019
ку	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	573.4	0.47%	1.16%	L63%	0.01%	0.02%	0.02
TN	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	454.1	0.54%	0.93%	L32%	0.02%	0.01%	0.02
GA	13015-2813011	Ga Power Company - Flant Bowen	241.6	1.70%	0.92%	1.25%	0.07%	0.01%	0.01
MO	29143-5363811	NEW MADRID POWER PLANT-MARSTON	625.2	0.36%	1.37%	1.28%	0.00%	0.01%	0.01
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	473,3	0.70%	2.55%	1.27%	0.01%	0.07%	0.09
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	657.6	0.49%	2.36%	1.23%	0.00%	0.00%	0.00
IN	18051-7363111	Gibson	554.2	0.29%	1.55%	1.23%	0.01%	0.07%	0.07
NC	37087-7920511	Blue Ridge Paper Products - Canton Mill	16.9	41.29%	2.14%	1.08%	6.65%	0.07%	0.10
ОН	39025-8294311	Duke Energy Ohlo, Wm. H. Zimmer Station (1413090154)	406.7	1.37%	1.59%	1.05%	0.03%	0.01%	0.01
AR	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	783.3	0.13%	1.74%	1,04%	0.00%	0.01%	0.01
TN	47163-3982311	EASTMAN CHEMICAL COMPANY	126.9	4.43%	0.74%	1.0484	0.40%	0.02%	0.02
		Facilities That Dropped Off After REVISION							
IN		INDIANAPOLIS POWER & LIGHT PETERSBURG	529.0	0.18%	1.12%	0.82%	0.01%	0.11%	
IL.	17127-7808911	Joppa Steam	582.4	0.23%	1.07%	0.59%	0.00%	0.01%	0.00









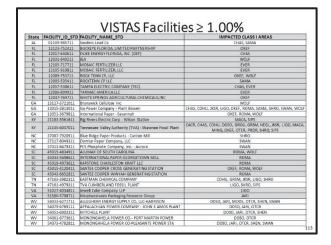


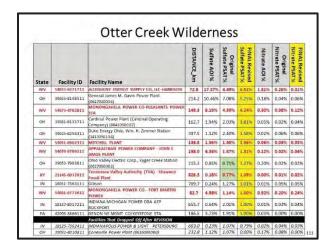
		Shenando	2111	VP					
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI%	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT%	Nitrate PSAT %
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	249.8	11.83%	8.89%	4.81%	0.10%	0.05%	0.06%
ОН	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	269.6	1.53%	2.32%	4.50%	0.06%	0.05%	0.129
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC- HARRISON	189.7	4.60%	2.75%	4.14%	0.99%	0.37%	0.469
ОН	39053-8148511	General James M. Gavin Power Plant (0627010056)	323.4	5.25%	4.88%	3,75%	0.14%	0.10%	0.149
WV.	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	265.0	4.97%	2.20%	2.20%	0.24%	0.18%	0.289
PA.	42063-3005211	HOMER CITY GEN LP/ CENTER TWP	230.4	2.60%	1.56%	1.78%	0.13%	0.04%	0.069
MD	24001-7763811	Luke Paper Company	118.4	6.90%	2.20%	1.41%	0.23%	0.09%	0.149
PA	42063-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	215.5	1.80%	1.00%	1.12%	0.04%	0.02%	0.029
WV	54051-6902811	MITCHELL PLANT	251.8	1.46%	0.88%	1.01%	0.11%	0.08%	0.169
ОН	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	324.1	0.43%	0.55%	1,01%	0.16%	0.06%	0.069
		Facilities That Dropped Off After REVISION							
wv	54061-6773611	MONONGAHELA POWER CO FORT MARTIN FOWER	184,4	2.41%	1.06%	0,97%	1,27%	0.47%	0.609
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	505.4	1.31%	1.28%	0.87%	0,11%	0.05%	0.069
WV	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	295.6	2.09%	1.04%	0.84%	0.09%	0.09%	0.199
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	755.8	0.71%	1.46%	0.76%	0.03%	0.02%	0.039

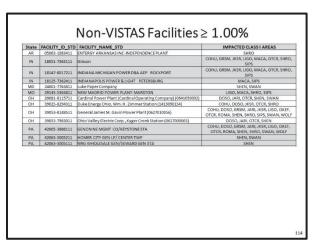
#### Non-VISTAS Class I Areas

- Only two VISTAS facilities have a contribution
   ≥ 1.00% at any non-VISTAS Class I Area
- ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON (WV)
  - Moosehorn Wilderness EDM (1.06% sulfate)
- Tennessee Valley Authority (TVA) Shawnee Fossil Plant (KY)
  - · Caney Creek Wilderness Area (1.09% sulfate)
  - Hercules-Glades Wilderness Area (1.95% sulfate)
  - · Mingo Wilderness Area (1.47% sulfate)
  - Great Gulf Wilderness Area (1.03% sulfate)
  - Presidential Range-Dry River Wilderness (1.03% sulfate)

State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT%	FINAL Revised Sulfate PSAT%	Nitrate AOI %	Original Nitrate PSAT%	Nitrate PSAT%
wv	54013-6271711	ALLEGHENY ENERGY SUPPLY CO, LIC-HARRISON	83.6	13.58%	4.94%	7.18%	1.36%	0.26%	0.319
ОН	39053-8148511	General James M. Gavin Power Plant (0627010056)	233.8	7.62%	6.56%	4,88%	0.10%	0.03%	0.059
WV	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	163.9	4.64%	4.82%	4,19%	0.16%	0.07%	0.109
ОН	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	163.9	1.36%	2.14%	4,02%	0.03%	0.01%	0.039
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	416.9	1.40%	2.25%	1,49%	0.02%	0.04%	0.059
wv	54051-6902311	MITCHELL PLANT	144.2	1.45%	1.28%	1.42%	0.07%	0.02%	0.059
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	172.8	4.12%	2.43%	1.27%	0.01%	0.00%	0.009
ОН	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	234.9	0.62%	0.66%	1.18%	0.11%	0.02%	0.029
wv	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	219.8	3.56%	1.45%	1.14%	0.11%	0.01%	0.039
wy	54061-6773611	MONONGAHELA POWER CO. FORT MARTIN POWER	79.8	6.53%	1.27%	1,13%	1.07%	0.18%	0.239
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	847.6	0.12%	0.74%	1.05%	0.00%	0.01%	0.029
		Facilities That Dropped Off After REVISION							
IN	18051-7363111	Gibson	729.5	0.04%	1.24%	0.99%	0.02%	0.04%	0.049
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	676.3	0.44%	1.93%	0.97%	0.01%	0.02%	0.039
IN	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	682.6	0.18%	1.05%	0.77%	0.02%	0.04%	0.03%
OH	39032-8010811	Conesville Power Plant (0615000000)	242.3	0.71%	1.09%	0.00%	0.12%	0.08%	0.009







#### EPA Guidance (August 20, 2019)

- Many facilities already have effective emission control technologies in place. States will consider control options for these facilities on a case-by-case basis.
  - "For the purpose of SO<sub>2</sub> control measures, an EGU that has add-on flue gas desulfurization (FGD) and that meets the applicable alternative SO<sub>2</sub> emission limit of the 2012 Mercury Air Toxics Standards (MATS) rule for power plants. The two limits in the rule (0.2 lb/MMBtu for coalfired EGUs or 0.3 lb/MMBtu for EGUs fired with oil-derived solid fuel) are low enough that it is unlikely that an analysis of control measures for a source already equipped with a scrubber and meeting one of these limits would conclude that even more stringent control of SO<sub>2</sub> is necessary to make reasonable progress."
  - "For the purposes of SO, and NOx control measures, a combustion source (e.g., an EGU or industrial boiler or process heater) that, during the first implementation period, installed a FGD system that operates year-round with an effectiveness of at least 90 percent or by the installation of a selective catalytic reduction system that operates year-round with an overall effectiveness of at least 90 percent (in both cases calculating the effectiveness as the total for the system, including any bypassed flue gas), on a pollutant-specific basis."

Task	Schedule
2028 Point Emissions Updates	Completed
2028 Emissions Processing	Late April, 2020
2028 CAMx Modeling	Late June, 2020
2028 Visibility Projections	Mid-July, 2020
2028 Deposition Projections	Mid-July, 2020
Final Reports and Documentation	Late July, 2020
Website Updates and Postings	Late July, 2020
End of Contract	September 30, 2020
Regional Haze SIPs Due to EPA	July 31, 2021

#### **Additional Considerations**

- The final list of four-factor analysis sources will be determined in consultation with the FLMs, EPA, other states, and stakeholders.
- Some VISTAS states may perform additional fourfactor analyses for sources not listed on Slide 113.
- States will verify projected SO<sub>2</sub> and NOx emissions with facilities. PSAT results can be adjusted to match.
- Some states may allow their facilities to take a permit limit that will result in adjusted PSAT impacts below the 1.00% threshold in lieu of performing a four-factor analysis.
- The large number of coal-fired EGU retirements and fuel switching from coal to natural gas needs to be considered along with the sources selected for the four-factor analysis. States should not be penalized for early action.

Contacts for Further Information

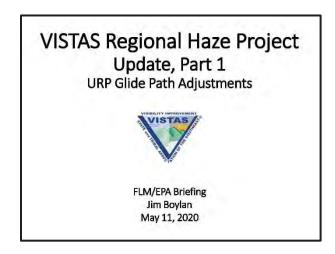
- For general, technical, and SIP-related questions, contact the TAWG and CC Chairs:
  - TAWG Randy Strait (randy.strait@ncdenr.gov)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
- For general, contract, and funding questions, contact the Project Manager:
  - · John Hornback (hornback@metro4-sesarm.org)

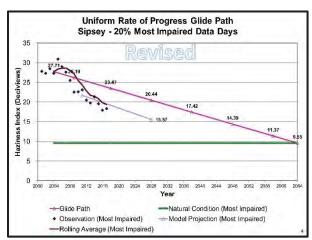


1

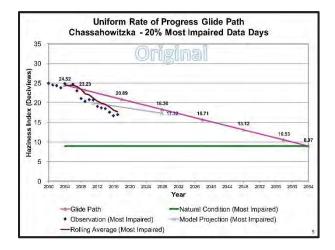
### Next Steps and Schedule

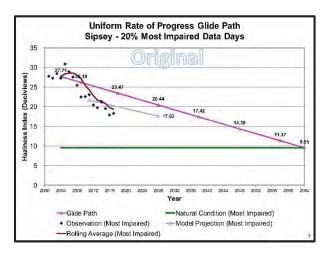
# Appendix F-3j - VISTAS Regional Haze Project Update to FLMs, EPA OAQPS, Region 3, Region 4, MJOs May 11, 2020

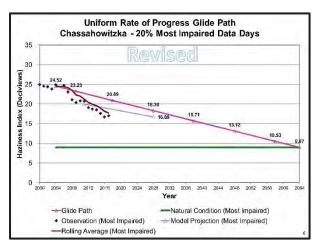


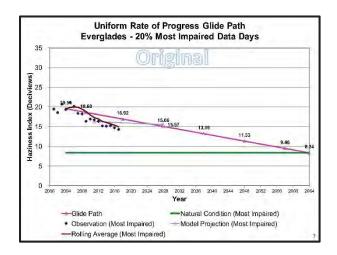


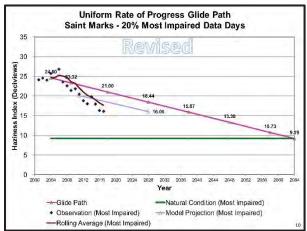
# ORIGINAL AND REVISED 2028 MODEL PROJECTIONS

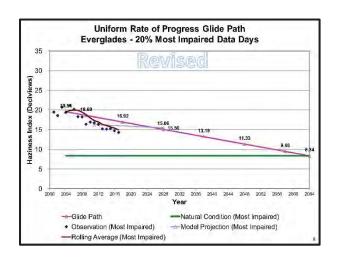


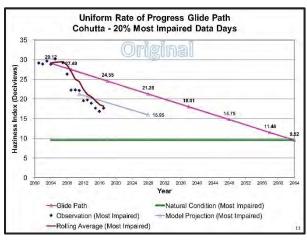


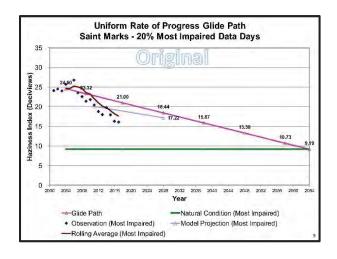


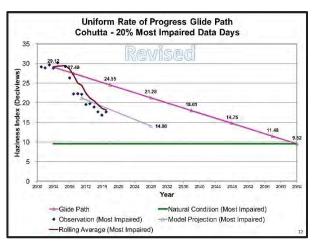


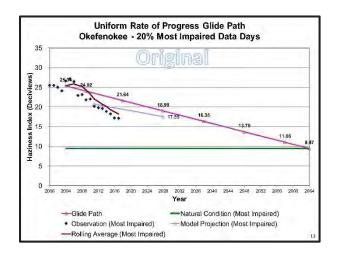


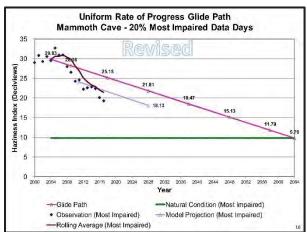


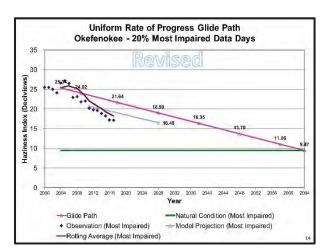


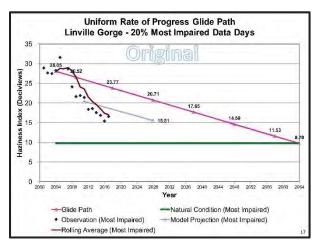


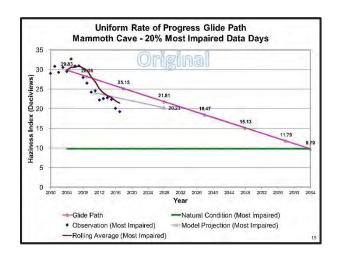


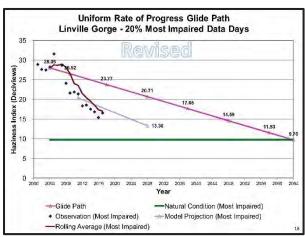


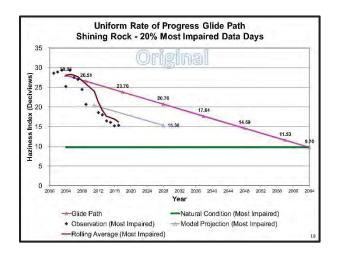


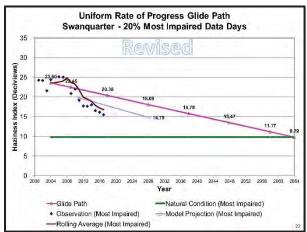


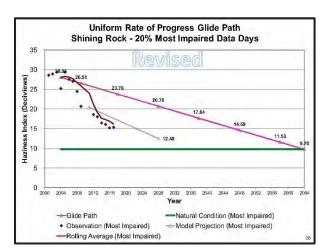


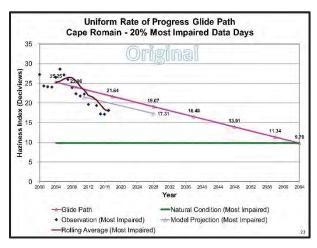


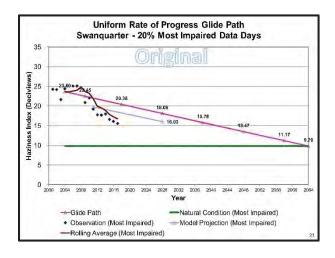


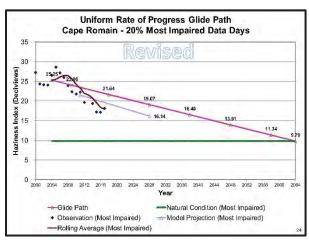


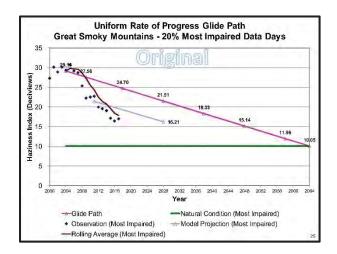


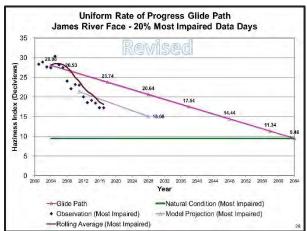


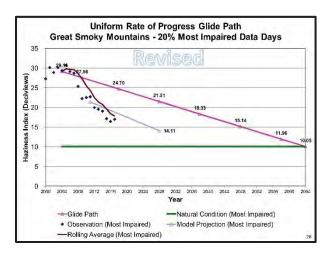


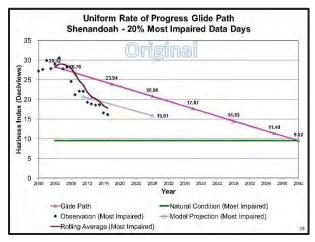


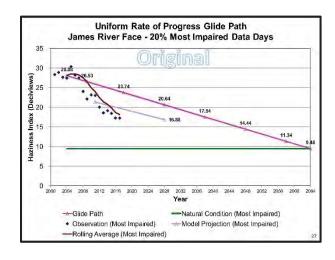


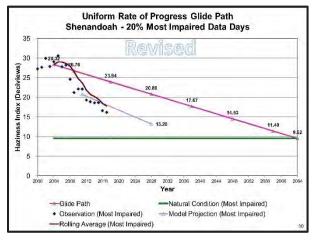


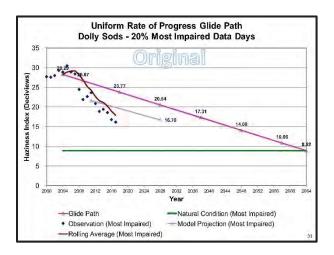


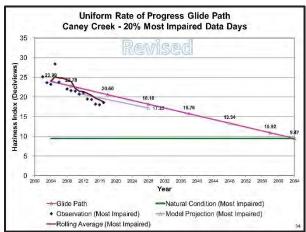


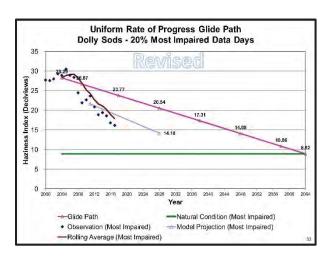


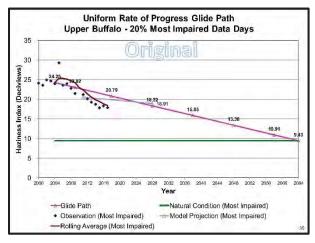


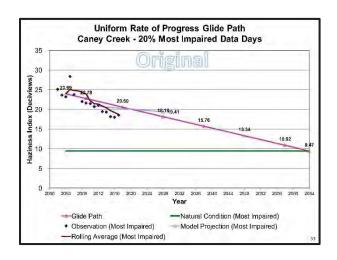


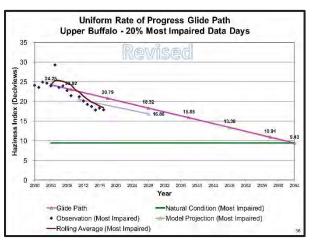


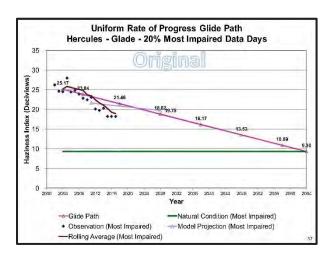


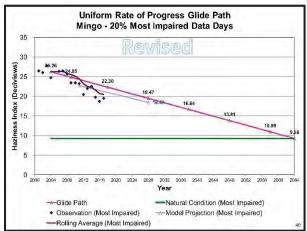


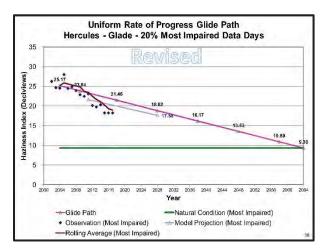


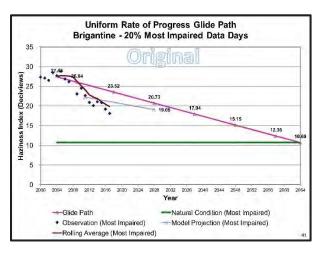


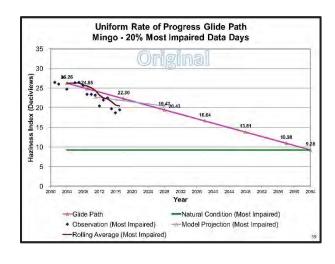


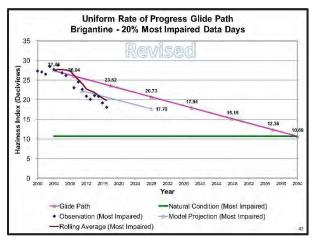












#### Contacts for Further Information

- For general, technical, and SIP-related questions, contact the TAWG and CC Chairs:
  - TAWG Randy Strait (<u>randy.strait@ncdenr.gov</u>)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
- For project and contract management questions, contact the Project Manager:
  - John Hornback (hornback@metro4-sesarm.org)







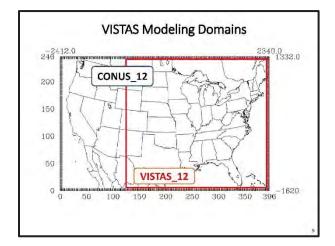
May 11, 2020

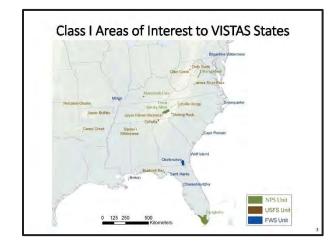


#### Outline

- Background Information
- 2028 Emissions Updates
- Revised 2028 PSAT Stacked Bar Charts
- Reasonable Progress Analysis
- Next Steps & Schedule





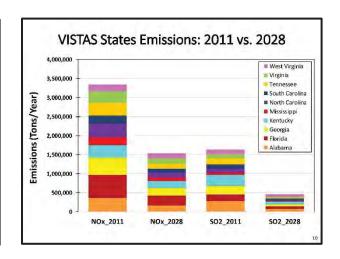


# Initial VISTAS Emissions Updates • Used EPA's 2011 base year emissions without change • Updated EPA's Initial 2028 projection year emissions • EGU and major non-EGU sources • Removed Clean Power Plan assumptions • VISTAS – Adjusted for changes in fuels and facility operating plans • Non-VISTAS – Used ERTAC 2.7opt

#### VISTAS vs. EPA Updated 2028 Emission Projections

 The table below compares the 2028 point emissions used by VISTAS vs. the latest 2028fh emissions used by EPA (projected from 2016). The emissions below are extracted from the VISTAS 12 modeling domain which covers the Eastern U.S.

Pollutant	VISTAS 2028 (tpy)	New EPA 2028 (tpy)	Change (tpy)	Change (%)
NOx	2,641,463.83	2,108,115.50	-533,348.33	-20.19%
SO2	2,574,542.02	1,400,287.10	-1,174,254.92	-45.61%



#### Old ERTAC (2.7opt) vs. New ERTAC (16.0)

502	16.0_2028	2.7opt_2028	∆ SO2	∆ SO2
CENSARA	367,683.7	760,828.2	-393,144.5	-51.67%
LADCO	266,047.0	379,577.5	-113,530.5	-29.91%
MANE-VU	78,657.0	196,672.6	-118,015.6	-60.01%
VISTAS	161,502.5	273,582.1	-112,079.6	-40.97%
TOTAL	976,471.2	1,783,376.5	-806,905.3	-45.25%
NOx	16.0_2028	2.7opt_2028	ΔNOx	Δ ΝΟχ
CENSARA	244,499.3	354,795.1	-110,295.8	-31.09%
LADCO	166,429.4	198,966.9	-32,537.4	-16.35%
MANE-VU	56,315.3	83,432.5	-27,117.2	-32.50%
VISTAS	200,791.1	270,615.7	-69,824.6	-25.80%
TOTAL	840,973.6	1,166,663.1	-325.689.5	-27.92%

#### Additional Modeling-Related Tasks

- Emissions processing
- Updated 2028 CAMx modeling (VISTAS\_12)
- · Updated 2028 visibility projections
- Documentation

#### VISTAS CC/TAWG Conclusions

- 1. 2028 emission updates are necessary
  - · VISTAS States States will:
    - Update 2028 major source emissions projections (SO  $_{\rm 2}$  , NOx, PM  $_{\rm 2.5}$  , PM  $_{\rm 10}$  , NH  $_{\rm 3}$  , CO) at the facility and unit level
    - Add any new sources of significance
  - LADCO States SESARM will:
  - Replace ERTAC\_2.7 with ERTAC\_16.1 based on LADCO input
  - All Other States SESARM will:
    - Replace ERTAC 2.7 with ERTAC 16.0
    - Verify accuracy of large SO<sub>2</sub> and NOx source emissions projections via contact with surrounding states/RPOs and update emissions as needed
- 2. Additional 2028 air quality modeling is needed

# Updated 2028 Point Emissions

State/ RPO	Point_OLD (tpy)	Point_NEW (tpv)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpv)	Delta (%)
AL	87,111.28	59,056.98	-32.2%	15,480.96	8,365.96	46.0%	71,630.32	50,691.02	29.2%
FL	63,501.23	52,982.68	-16.6%	28,547.41	24,004.67	-15.9%	34,953.82	28,978.01	-17.1%
GA	37,065.83	36,166.09	2.4%	18,473.28	17,573.54	4.9%	18,592.55	18,592.55	0.0%
KY	75,140.26	65,636.83	-12.6%	56,262.06	49,585.95	-11.9%	18,878.20	16,050.88	-15.0%
MS	21,234.31	8,405.06	-60.4%	5,984.57	3,236.28	-53.7%	14,249.74	5,168.78	-63.7%
NE	35,232.88	24,347.18	30.9%	19,734.80	9,571.47	51.5%	15,498.08	14,775.71	4.7%
SC	29,600.85	29,601.25	0.0%	10,693.79	10,695.34	0.0%	18,907.05	18,905.91	0.0%
TN	23,447.58	21,057.17	-10.2%	12,114.30	10,030.04	-17.2%	11,333.28	11,027.13	-2.7%
VA	19,839.18	18,551.32	6.5%	3,264.09	1,976.23	39.5%	16,575.09	16,575.09	0.0%
WV	63,404.07	53,715.79	-15.3%	57,828.67	47,744.49	-17,4%	5,575,41	5,971,30	7.1%
CENSARA	1,012,946.59	621,321.29	-38.7%	773,625.13	382,000.54	-50.6%	239,321.46	239,320.75	0.0%
LADCO	660,186.42	498,171.62	24.5%	444,506.99	282,492.18	36.4%	215,679.44	215,679.44	0.0%
MANE-VU	270,810.83	149,439.76	-44.8%	203,661.43	95,074.20	-53.3%	67,149.39	54,365.55	-19.0%
WRAP	182,121.89	135,483.18	25.6%	136,955.17	90,316.46	34.1%	45,166.72	45,166.73	0.0%
TOTAL	2,581,643.20	1,773,936.20	-3L3%	1,788,132.63	1,032,667.35	-42.2%	793,510.56	741,268.85	-6.6%

#### **PSAT Source Apportionment Modeling**

- · Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- · Used for further evaluation of AOI results
- · Refines information on contributions to visibility impairment
- · Can be used to adjust future year visibility projections to account for additional emission
- . VISTAS contract with ERG allows for up to 250 tags

State/ RPO	Point_OLD (tpv)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpv)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpv)	Delta (%)
AL	80,389.97	70,824.72	-11.9%	26,895.35	20,008.14	25.6%	53,494.61	50,816.58	-5.0%
FL	68,006,19	70,010.40	2.9%	26,250,73	25,049,90	-4.6%	41,755,45	44,960,50	7.7%
GA	67,197.50	65.885.55	2.0%	25,899.67	24,587,73	5.1%	41.297.83	41,297.83	0.0%
KY	66,240.03	62,130,83	-6.2%	36,781.72	32,695,94	-11/1%	29.458.31	29,434,89	-0.1%
MS	52,159,32	46,853.62	-10.2%	18.279.53	12,208.89	-33,2%	33.879.79	34,644.73	2.3%
NC	65,863.97	58,933.80	10.5%	27,842.23	20,977.65	24.7%	38,021.74	37,956.15	0.2%
SC	36,051.31	36,170.87	0.3%	10,522.78	10,707.42	1.8%	25,528.53	25,463.44	-0.39
TN	45,879.07	42,954.25	-6.4%	10,086.01	7,814.13	-22.5%	35,793.06	35,140.12	-1.8%
.VA	43,210.19	41,671.99	3.6%	11,973.97	10,435.77	12,8%	31,236.22	31,236.22	0.0%
WV	65,054.07	68,200.77	4.8%	46,721.77	49,874.15	6.7%	18,332,30	18,326.62	0.0%
CENSARA	903,979.85	791,397.59	-12.5%	382,706.66	270,182.46	-29.4%	521,273.19	521,215.14	0.0%
LADCO	548,866.74	491,345.00	10.5%	244,035.26	186,513.52	23.6%	304,831.49	304,831.49	0.0%
MANE-VU	244,280.15	222,991.41	-8.7%	103,465.15	82,176.41	-20,6%	140,815.00	140,815.00	0.0%
WRAP	362,819.80	301,433.41	16.9%	187,944.97	126,558.55	-32.7%	174,874.83	174,874.86	0.0%
TOTAL	2,649,998.14	2,370,804,22	-10.5%	1,159,405.80	879,790.66	-24.1%	1,490,592.35	1,491,013.55	0.0%

#### PSAT SO<sub>2</sub> and NOx Tags (209)

- Round 1 (122 tags)
  Total SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
  Total NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

#### Round 2 (87 tags)

- Non-EGU point SO<sub>2</sub> for 10 individual VISTAS states + 3 RPOs = 13 tags
- Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> and NOx for N/S/W/E boundaries = 8 tags

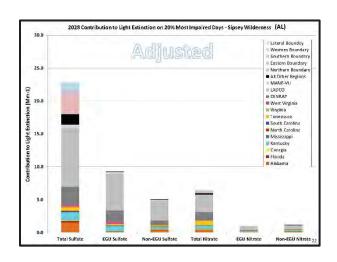
- SO<sub>2</sub> tags for individual VISTAS facilities = 10 tags
   NOx tags for individual VISTAS facilities = 16 tags
   SO<sub>2</sub> tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags

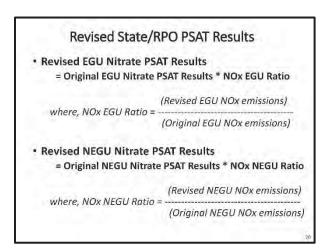
**Revised 2028 PSAT** Stacked Bar Charts (Original and Adjusted)

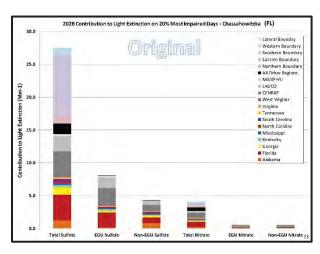
#### **PSAT Adjustment Ratios**

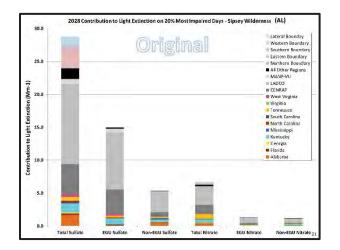
State/RPO	SO <sub>2</sub> EGU Ratio	SO <sub>2</sub> NEGU Ratio	NOx EGU Ratio	NOx NEGL Ratio
AL	0.540	0.708	0.744	0.950
FL	0.841	0.829	0.954	1.077
GA	0.951	1.000	0.949	1.000
KY	0.881	0.850	0.889	0.999
MS	0.463	0.363	0.668	1.023
NC	0.485	0.953	0.753	0.998
SC	1.000	1.000	1,018	0.997
TN	0.828	0.973	0.775	0.982
VA	0.605	1.000	0.872	1.000
WV	0.826	1.071	1.067	1.000
CENSARA	0.494	1.000	0.706	1.000
LADCO	0.636	1.000	0.764	1.000
MANE-VU	0.467	0.810	0.794	1.000

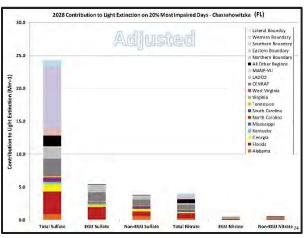
# Revised State/RPO PSAT Results • Revised EGU Sulfate PSAT Results = Original EGU Sulfate PSAT Results \* SO<sub>2</sub> EGU Ratio (Revised EGU SO<sub>2</sub> emissions) where, SO<sub>2</sub> EGU Ratio = (Revised EGU SO<sub>2</sub> emissions) • Revised NEGU Sulfate PSAT Results = Original NEGU Sulfate PSAT Results \* SO<sub>2</sub> NEGU Ratio (Revised NEGU SO<sub>2</sub> emissions) where, SO<sub>2</sub> NEGU Ratio = (Revised NEGU SO<sub>2</sub> emissions) (Original NEGU SO<sub>2</sub> emissions)

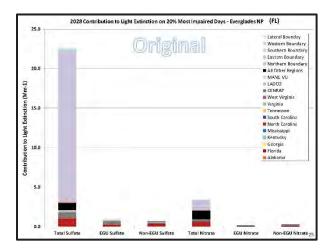


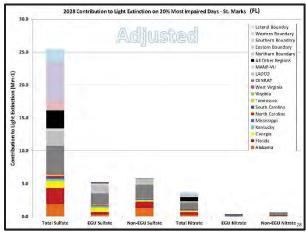


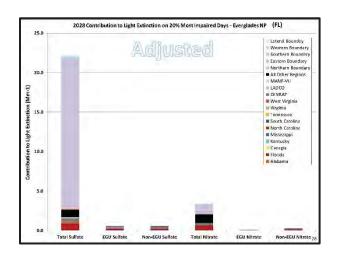


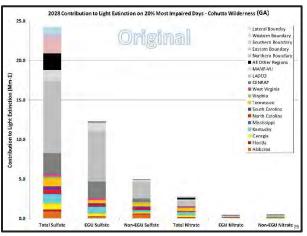


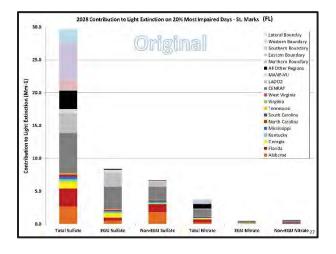


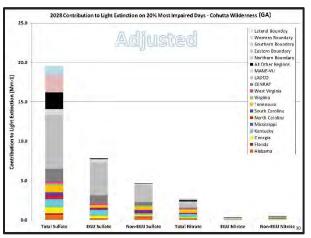


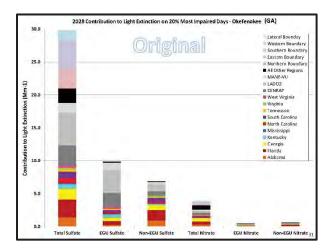


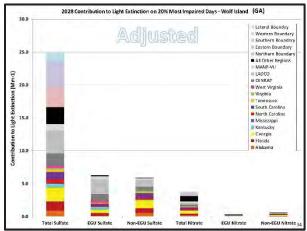


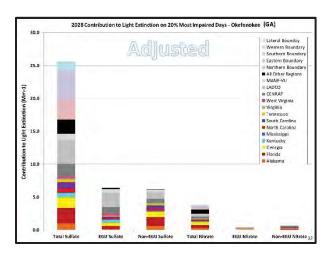


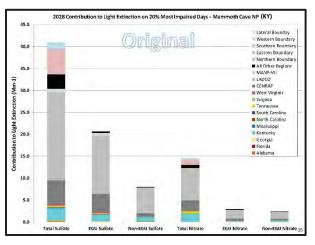


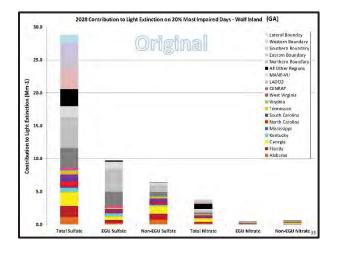


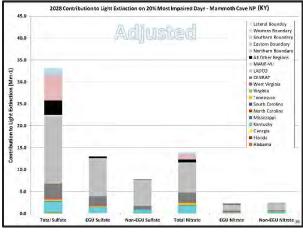


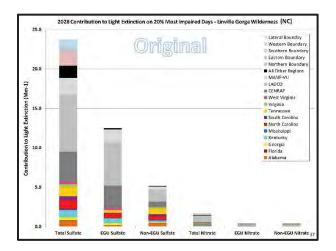


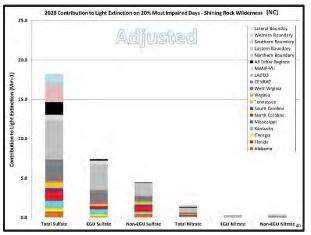


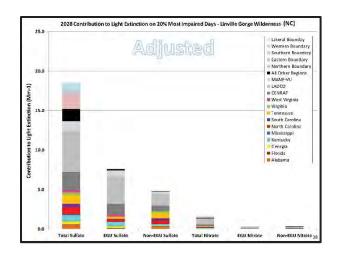


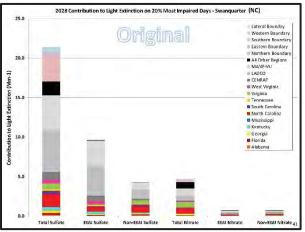


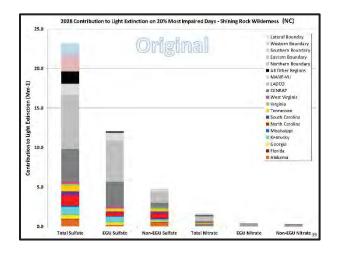


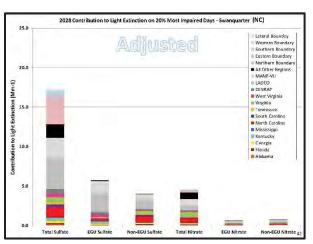


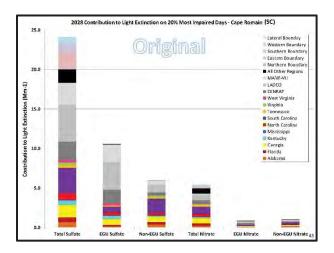


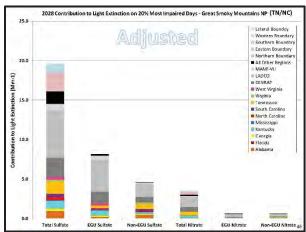


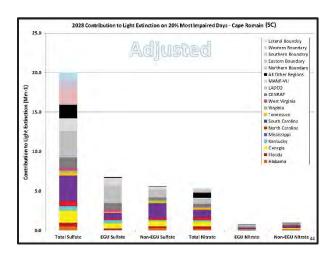


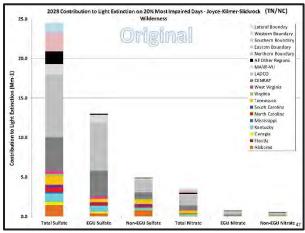


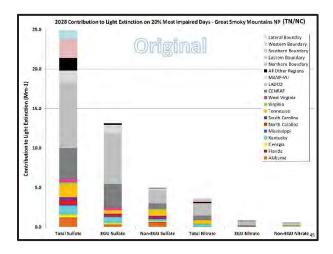


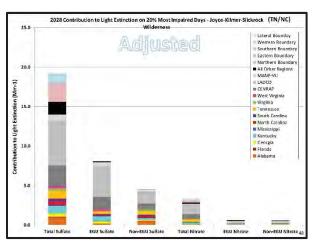


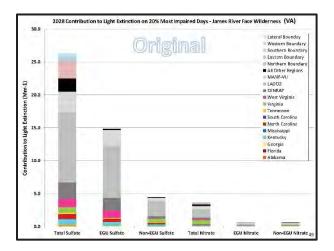


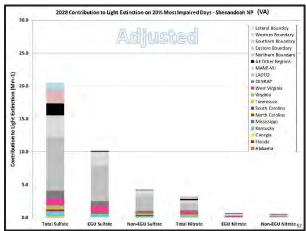


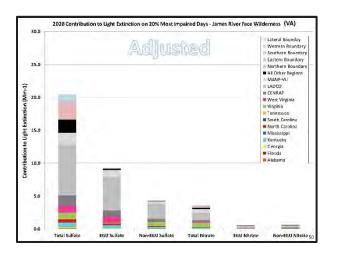


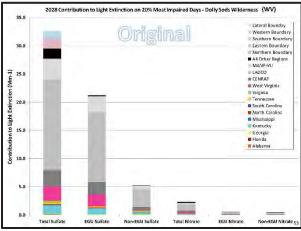


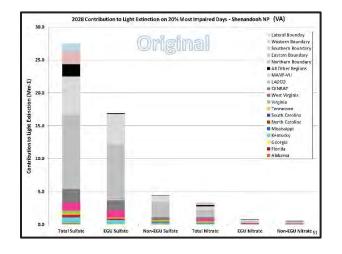


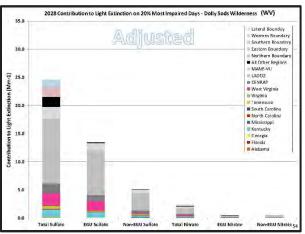


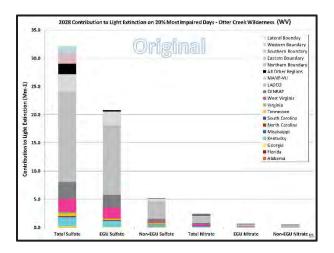


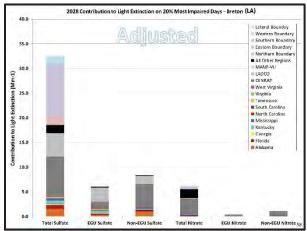


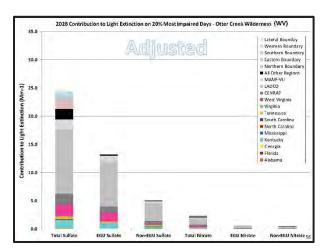


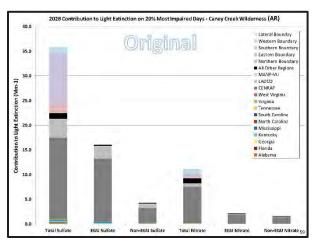


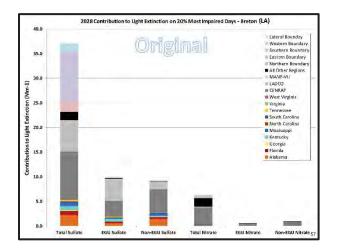


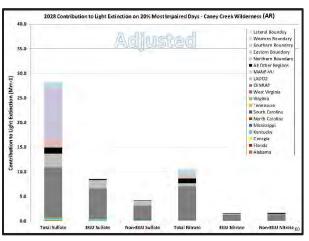


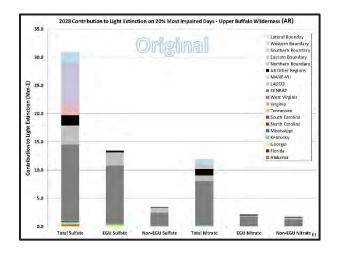


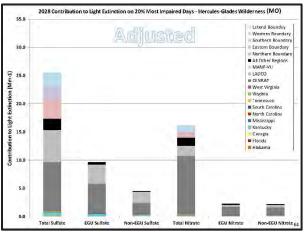


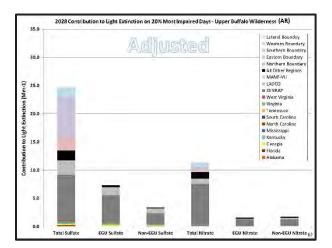


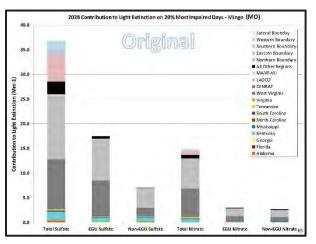


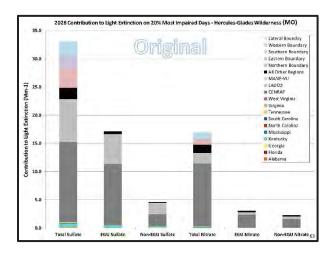


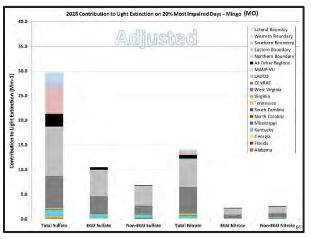


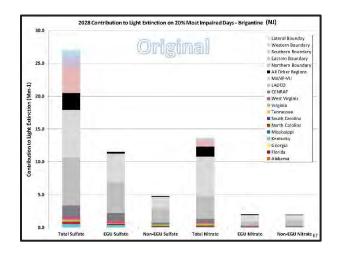






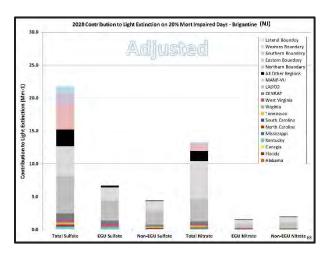






# Reasonable Progress Screening Approach

- The VISTAS reasonable progress work started with AOI screening (Q/d \* EWRT) to rank facilities based on their sulfate and nitrate contributions at each Class I area.
- These rankings were used to identify 87 individual facilities for PSAT tagging. PSAT tagging was used to determine the sulfate and nitrate contributions from each facility at each Class I area in the VISTAS 12 domain.
- 3. Each individual VISTAS state will apply a PSAT contribution threshold based on the facility sulfate and facility nitrate impacts (separately, not combined) divided by the total impact of sulfate + nitrate from all point sources to determine which sources may need to be considered for a four-factor analysis.
  - If sulfate contribution ≥ 1.00% → SO, Four-Factor Analysis
  - If nitrate contribution ≥ 1.00% → NOx Four-Factor Analysis



# Why 1% Threshold?

- In the Round 1 Regional Haze SIPs, many VISTAS states used the AOI approach and a 1% threshold on a <u>Unit</u> basis.
  - Round 2 uses the AOI/PSAT approach and a ≥ 1.00% PSAT threshold based on a <u>Facility</u> basis.
    - This will pull in more facilities compared to a Unit basis.
  - Round 2 uses 2028 emissions (lower than 2018)
     This will pull in facilities with smaller visibility impacts (in Mm<sup>-1</sup>) compared to Round 1.
- This approach results in a reasonable number of sources that can be evaluated with limited state resources and focuses on the sources with the largest impacts.

# Reasonable Progress Analysis

# **HYSPLIT Trajectories**

- Trajectories were run using NAM-12 meteorology for the 20% most impaired days in 2011-2016 at 44 Class I areas.
  - Trajectories were run with starting heights of 100, 500, 1,000, and 1,500 meters.
  - Trajectories were run 72 hours backwards in time for each height at each location.
  - Trajectories were run with start times of 12AM (midnight of the start of the day), 6AM, 12PM, 6PM, and 12AM (midnight at the end of the day) local time.
- 44 Class I areas x 6 years x 24 days/year x 4 heights x 5 start times = 126,720 trajectories

# Area of Influence (AOI) Analysis

- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: (Q/d)\*EWRT
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the four-factor analysis
- · Georgia Example:
  - Sources in Georgia, used ≥ 2% threshold
  - Sources outside Georgia, used ≥ 4% threshold

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SOZ_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Brunswick Cellulose inc	27.9	1,554.5	294.2	2.94%	B.84%
FL	ROCK TENN CP, ELC	74.9	2,316.8	2,606.7	0.39%	8.58%
GA	International Paper - Savannah	85.9	1,560.7	3,945.4	0.24%	7.53%
FL	(FA	105.1	651.8	2,094.5	0.09%	0.43%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	109.9	351.5	1,860.2	0.03%	2,65%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS INC	173.6	112.4	2,743.0	0.01%	1.97%
SC	ALLIMAX OF SOUTH CAROLINA	223.B	108.1	3,751.7	0.00%	1.84%
FL	RAYONIER PEREORMANCE EIBERS ILC	77.4	2,327.1	362.0	0.38%	1.79%
FL	SEVINOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	0.02%	1:77%
OH	General James M. Gavin Power Plant (0627010056)	845.3	8,122.5	41,595.8	0.02%	1.71%
SC	SAVITE COOPER CROSS GENERATING STATION	251.0	3,273.5	4,281.2	0.09%	1.59%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	597.1	0.00%	1.55%
FU	FT CFEMICAL HOLDINGS, INC.	118.5	37.7	898.9	0.00%	1.22%
FL	DUKE ENERGY PLORIDA, INC. (DEF)	296.6	2,489.8	5,306.4	0.04%	1.19%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.03%	1.08%
GA	Savannah Sugar Refinery	89.9	521.6	582.0	0.08%	1.06%
SE	INTERNATIONAL PAPER EASTOVER	288.7	1,780.3	3,212.9	0.05%	0.95%
GA	Ge Power Company - Plant McManus	27.1	72.2	30.1	0.14%	0.93%
SC	KAPSTONE CHARLESTON (RAFT LLC	213.E	2,355.8	1,863.7	0.09%	0.89%
PA	GENCH HE MGMT CO/KEYSTONESTA	1.048.6	6.578.5	56.939.2	0.01%	0.84%

AOI Point Contributions for Wolf Island

AOL	Point	Contrib	utions	for Col	nutta
$\Delta U$	CHIL	COLLUD	440113	IUI CUI	Iutta

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SOZ_2028 (tons/year)	ND: Contribution	502 Contribution
GA.	Ga Power Company - Plant Bowen	78.0	6,643.3	10,453.4	1.15%	19.58%
IN	INDIANA MICHIGAN FOWER DRA AEF ROCKPORT	410 1	8,806.8	30,536,3	0.13%	4.68%
GA	International Paper - Rome	87.4	1,773.4	1,791.0	0.18%	4.66%
IN	Giltson	487.1	12,280.3	23,117.2	0.10%	2.31%
IN.	NDIANAPOL'S POWER & L'GHT PETERSBURG	477.0	10,665.3	18.141.9	0.16%	2.18%
Kn	Tennessee Valley Authority (TVA) Shawnee Possil Plant	457,2	7,007.3	19,504.7	0.07%	2.18%
TN	TVA KINGSTON FOSSIL PLANT	1124.0	1,687.4	1,886.1	0.13%	2,17%
DH	General James M. Govin Proves Plant (062/2010056)	512.0	8,122.5	41,595.8	0.02%	1.71%
1N	IVA CUMBERLAND I OSSIL PLANT	327.0	4,916.5	8,427.3	0.09%	1.38%
Kv.	Big Rivers Electric Corp - Wilson Station	369.0	1.151.9	6,934.2	0.01%	1.07%
DH	Dake Energy Ohio, Wm. II. Zimmer Station (1413090154)	454.E	7,150.0	22,133.9	0.06%	1.05%
GA	Ga Power Company - Plant Wansley	156.8	2,052.5	4,856.0	0.04%	1.05%
Ky.	CY Utilities Co - Chant Station	441.5	7,939.9	10,169.3	0.08%	1.05%
II.	Joppa Steam	456.9	4,706.3	20,509.3	0.02%	1.04%
GA	Michael Industries Inc	32.0	66.5	77.1	0.07%	1.02%
1N	EASTMAN CHEMICAL COMPANY	269.8	6,900.3	6,420.2	0.09%	0.99%
MU.	AMEREN MISSOURHLABADIE PLANT	695.4	9,685.5	41,740.3	0.01%	0.98%
10	Newton	564.0	1,934.9	10,631.6	0.01%	0.91%
GA	Chemical Products Corporation	71.9	19.5	513.8	0.00%	0.89%
IN:	INDIANA KENTUCKY ELECTRIC COMPORATION	444.4	6,188.5	9,038.1	0.04%	0.76%

# Georgia Tagging for PSAT

- Sources in Georgia (≥ 2% threshold)
  - Ga Power Company Plant Bowen
  - International Paper Rome (aka TEMPLE INLAND)
  - · International Paper Savannah
  - · Brunswick Cellulose Inc
  - Georgia-Pacific Consumer Products LP (Savannah River Mill)
- Sources outside Georgia (≥ 4% threshold)
  - INDIANA MICHIGAN POWER DBA AEP ROCKPORT (IN)
  - · ROCK TENN CP, LLC (FL)
  - · JEA (FL)

**AOI Point Contributions for Okefenokee** 

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SOZ_2028 (tons/year)	NDx Contribution	502 Contribution
FL	WHITE STRINGS AGRICULTURAL CHEMICALS, INC.	71.5	.112.4	2,745.0	0.03%	14.63%
FL	ROCK TENN CP, LLC	64.8	2,316.8	2,606.7	0.88%	12.82%
FL	JEA .	65.6	851.8	2,094.5	0.18%	6.60%
FL	SEVENDEL E ECTRIC COGPERATIVE, PAC.	121.4	917.8	3,713.4	0.07%	3.25%
R.	IT CHEMICAL HOLDINGS, INC.	56.8	37.7	898,9	0.01%	3.25%
FL	RAYONIER PERFORMANCE FIBERS LLC	63.4	2,327.1	562.0	0.90%	2.82%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	0.08%	2.81%
FL	BUCKEYE FLORIDA, I MITTO PARTNERS IIP	153.5	1,830.7	1,520.4	0.1/1%	2.18%
FL	RENESSENZ LLC	59.8	66.3	569.5	0.02%	1,96%
TI-	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.8	5,306.4	0.06%	1.40%
AU	Sandors cod Co	384.E	121.7	7,951.1	0.00%	1.1198
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	197.2	351,5	1,860.2	0.01%	1.05%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.05%	1.02%
GA	Brunswick Cellulose Int	75.3	1,554,5	294.2	0.34%	1.01%
SC	ALUMAX OF SOUTH CARGUNA	322.7	108.1	3,751,7	0.00%	0.97%
GA	PCA Valdosta Mill	112.7	1,032.6	485.7	0.09%	0.85%
SU	SANTEE COOPER CROSS GENERATING STATION	348.1	3,273.5	4,281.2	0.05%	0.85%
FL	CITY OF GAINESVILLE, GRU	11157	410.0	881.4	0.03%	0.79%
SC	KAPSTONE CHARLESTON KRAFT LLC	314.9	2,355.8	1,863.7	0.06%	0.65%
GA	Ga Power Company - Plant Wansley	403.7	2,052,5	4.856.0	0.02%	0.65%

# **AOI Screening Summary**

State	Threshold	Notes
AL	2%	Sulfate only
FL	5%	Sulfate or nitrate, plus Gulf Crist, Mosaic Bartow, Mosaic New Wales, and Mosaic Riverview
GA	2% - 4%	Sulfate or nitrate, 2% threshold for GA facilities, 4% threshold for facilities outside GA
KY	2%	Sulfate or nitrate
MS	2%	Sulfate or nitrate
NC	3%	Sulfate + nitrate
sc	2% - 5%	2% for sulfate, 5% for nitrate, plus Santee Cooper Winyah, International Paper Georgetown, and SCE&G Williams
TN	3%	Sulfate + nitrate, plus CEMEX
VA	2%	Sulfate + nitrate
wv	0.2%	Sulfate or nitrate

# **PSAT Source Apportionment Modeling**

- · Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- · NOx and SO2 tagging
- Used for further evaluation of AOI results
- Refines information on contributions to visibility impairment
- · Can be used to adjust future year visibility projections to account for additional emission
- · VISTAS contract with ERG allows for up to 250 tags

	SO2 [TPY]	FACILITY_NAME_STD			lity State
1,151.79	6,934.15	Big livers :lectric Corp - Wilson Station	21183-5561511	VISTAS	KY
197,8	5,044.15	Century Numinum of KY LLC	21091 735741).	VISTAS	8Y
3,114.5	3,011.01	Tennossee Velley Authority - Parentine Fossil Plan.	21177 5195711	VISTAS	KY
7,003.3	19,504.75	Tennesses Villey Authority (TVA) - Showney Forsi Plant	21145-5032011	VISTAS	KY
1,534.1	741.50	Chevrin Products Company, Postagoula Refinery	28059 6384311	VISTAS	V5
3,829.7	231.92	Mississippi Power Company, Plant Victor , Daniel	28059-5291011	VISTAS	VS
2,992.3	1,127.07	Blue Ridge Paper Products - Carcon Mill	37637-7920511	VISTAS	AC.
1,795.4	587.45	Domter Paper Company, ILC	37117-5049311	VISTAS	4C
7,511.3	4,239.21	Duke Energy Carolinas: LLC - Marshall Steam Station	37035-8370111	VISTAS	WC -
495.5	4,845.90	PCS Phosphate Company, Inc Aurora	37013-5479311	VISTAS	VC.
21.6	261.64	SGL Carbon LLC	37023-8519011	VISTAS	AC.
108.0	3,751.69	ALLIMAX CL SOUTH CAROLINA	45015-4834911	VISTAS	50
2,031.2	2,767.52	INTERNATIONAL PAPER GEORGETOWN VILL	45043 5598511	VISTAS	50
2,355.8	1,863.55	KAPSTONE CHARLESTON KRAFT HE	45019 4973511	VISTAS	200
3,273.4	4,281,17	SANTEL COOPER GROSS GENERALING STATION	45015 4120411	VISTAS	50
1,772.9	2,246.65	SANTEE COOPER WINVALLG" NERATING STAT ON	45843 5552811	VISTAS	16
9927	392.43	SCERIG WILLIAMS	45015-3306711	VISTAS	50
711.5	121.47	Cemex - Knoxville Plant	47093-4979911	VISTAS	TN
6,900.3	6.420.15	EAST VAN CHEM CALCOMPANY	47153-3982311	VISTAS	TN
883.2	472.78	TATE & LYLE, Loudon	47105-4129211	VISTAS	TN.
964.1	522.54	TVA BULLRUN FOSSI, PLANT	47001-5195011	VISTAS	TN
4,916.5	8,427,33	TVA.CUMBER.AND FOSS L PLANT	47151-4979311	VISTAS	TN.
1,687.3	1,886.03	IVA (INGSTON FOSSIL PLANT)	47145-4979111	VISTAS	18
520,1	5,090.95	Jewell Coke Company L.P.	51027-4034811	VISTAS	WA.
1,985.5	2,115.31	Meadwestsarc Packaging Resource Group	51580-5/98/11	VISIAS	50
1,977.9	7,790,17	Rounake Cement Company	51023 5039611	VISTAS	.VA

# PSAT SO<sub>2</sub> and NOx Tags (209)

- Total 80, tags for 10 individual VISTAS states + 3 RPOs = 13 tags
   Total NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
   EGU point SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

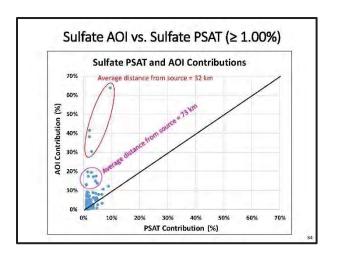
# Round 2 (87 tags)

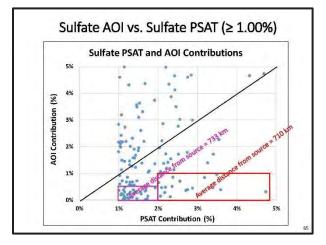
- Non-EGU point  $SO_2$  for 10 individual VISTAS states + 3 RPOs = 13 tags Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> and NOx for N/S/W/E boundaries = 8 tags
- · SO, tags for individual VISTAS facilities = 10 tags
- NOx tags for individual VISTAS facilities = 16 tags
- SO<sub>2</sub> tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags

→ 87 Total Facility Tags (both SO, and NOx)

lity State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 [TRY]	NON ITPY
WV	VISTAS		ALTEGRENY ENERGY SUPPLY CO. LUCHARRISON	10.082.54	11.830.8
WV	VISTAS	54049-4864511	AVERICAN SITUYINDUS POWER-GRANT TOWN 4LT	2,210.25	1,245,1
WX	VISTAS	54079-5789111	APPALACHIAN POWER COMPANY JOHN FAMOS PLANT	10,984.74	4,878.1
WV.	VISTAS	54023-5252011	Dominion Resources Inc. MIGURE STORM POWER STATION	7,123.54	1,984.1
WV	VISTAS	54041 5/900311	FOURTRANS COPIFY RUN CS 70	0.10	511.0
WY	VISTAS	54053-5790711	FILES CREEK BC/1340	0.15	643.3
WV	VISTAS	54033-5790511	GLADY 6C4350	0.11	343.2
WV.	VISTAS	54093-5327811	KINGSFORD WANUFACTURING COMPANY	16.95	140.8
WV	VISTAS	54061-16320111	LONGVIEW POWER	2,513.73	1,555.5
WV	VISTAS	54051-6902311	MITCHELL PLANT	5,372.40	2,719.6
WV	VISTAS	54061-6773611	MONONGAHELA POWERCO FORT MARTIN POWER:	4,881,87	13,743.3
WV	VISUAS	54073-4/82811	MONUNGAHELA POWER CO-PLEASANTS POWERSTA	15,817,45	5,497.3
wy	VISIAS	54051-57/3811	MORGANIOWN ENERGY ASSOCIATES	828.64	655.5
88	CENRAR	05853-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PURNT	32,050:48	34,133.1
VO:	DENRA?	29143 5363811	NEW MADEO POWER PLANT MARSTON	15,783.71	4,394.1
MP	VANE VII	24601 7763811	Juke Paper Company	22,559.84	3,607.0
PA	VIANE-VU	42005-3868111	GENON NE MGMT CO/KEYSTONE STA	56,939.25	6,573.4
PA	VIANE-VU	42053-3085211	HOMER CITY GEN LP/ CENTER TW/	11,865.70	5,215.9
PA	VANE-VU	42053-3085111	NRG WHOLESALE GEN/SEWARD GEN STA	8,880.25	2,254.5
IL P	Widwest RPQ	17127-7808911	Joppa Steam	20,503.28	4,705.3
IN I	Midwest RPO	18173-5183111	Alicua Warnick Power Plt Age Div of AL	5,071.28	11,158.5
IN P	Midwest RPO	18051-7363111	Gibton	23,217,23	12,280.3
191 1	Midwest RPO	18147-8017211	INDIANA MICHIGAN POWELUBA AFP. ROSKPORT	30,536.35	8,805.7
ite r	MINWESTRPO	18175-7562411	INDIANAVOUS POWER & UGHT PELERSBURG	18,141.88	30,665,2
18 1	Millwruni RPO	18129-8165111	Sigeon AB Brown South Indiana Gas & Ele	V,544.70	1,5/8.5
di r	Minwest BPO	19081 8115711	Cantinal Power Plant (Cantinal Operating Company) (054 (050002)	7,460.79	2,462.3
dr 1	MidwestRPO	19811-8016811	Conceville Power Plant (0615000000)	6,156.21	9,957.8
011	Minwest RPO	39875 8794311	Duk: Trongy Ohio, Wm. +. Zimmer Statem (1413090154)	72,133,90	7,149.9
	Widwest RPO	39053-3143511	General James IV., Gavin Power Plant (9627010056)	11,595.81	8,122.5
OH I	Widwest RPO	39053/7983011	Ohio Valley Electric Corp., Kyeer Ereek Station (0627000003)	3.400.14	9.149.8







# Reasonable Progress Screening Approach

- Due to the amount of resources already invested in the AOI and PSAT analysis, VISTAS plans to continue with our original reasonable progress analysis approach for determining which sources will require a four-factor analysis.
- In cases where emissions decreased or increased at individual facilities being considered for a fourfactor analysis, the facility contributions will be adjusted to be consistent with the lower/higher facility emissions before comparing to the PSAT contribution threshold.
- EPA verbally stated this should be okay 2/6/2020.

# AOI vs. PSAT Summary

- AOI tends to overestimate impacts for facilities near the Class I area.
- AOI tends to underestimate impacts for facilities far away from the Class I area.
  - AOI uses 72-hour back trajectories, sulfate can last for weeks and travel hundreds to thousands of km.
- PSAT is the most reliable modeling tool for tracking facility contributions to visibility impairment at Class I areas.

# Revised Facility Sulfate PSAT Results

Revised Facility Sulfate PSAT Results
 = Original Facility Sulfate PSAT Results
 \* SO<sub>2</sub> Ratio\_Facility \* Ratio\_Class\_I\_Area

(Revised sulfate + nitrate point contribution)

# Reasonable Progress Screening Approach

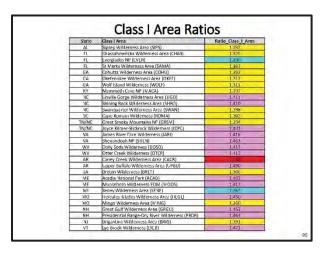
- The updated 2028 CAMx modeling will impact the <u>total</u> sulfate and total nitrate impacts from all sources at each Class I area since the SO<sub>2</sub> and NOx emissions have decreased.
- However, the <u>individual</u> sulfate and total nitrate impacts from the individual 87 tagged facilities should not change unless a facility has reduced or increased SO<sub>2</sub> and/or NOx emissions.
- Therefore, the percent contribution (facility sulfate impact/total impact of all point sources of sulfate + nitrate) will increase since the denominator will decrease; however, the order of the rankings from largest impact to smallest impact should not change unless one of those facilities reduced or increased emissions.

# Revised Facility Nitrate PSAT Results

Revised Facility Nitrate PSAT Results
 = Original Facility Nitrate PSAT Results
 \* NOx Ratio\_Facility \* Ratio\_Class\_I\_Area

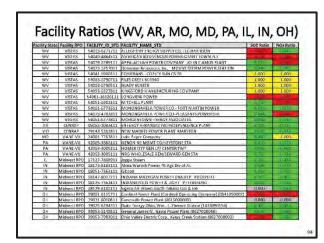
(Original sulfate + nitrate point contribution)

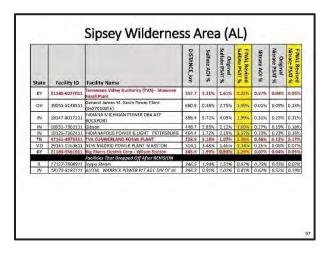
		Faci	lity Ratios (AL, FL, GA	1)	
acility State	Facility RPO		FACILITY NAME STD	SO2 Ratio	NOx Ratio
AL	VISTAS	01097-949811	Akzo Nobel Chemicals Inc	1.000	1.000
AL.	VISTAS	01097-1058111	Ala Power - Barry	0.00	1,000
Al	VISTAS	01129 1028711	American Midstream Chitom, ITC	0.000.0	0.000
Al.	VISTAS	01073 1018711	DRUMMOND COVPANY, INC.	1.000	1.000
Al	VISTAS	01053 7440211	Extendin Operating Company F. C.	II me	1:000
AL	VISTAS.	01053-985111	Escambia Operating Company L.C	G.HIO.	0,000
AL	VISTAS	01103-1000011	Nucor Steel Decatur LIC	1.000	1,000
AL	VISTAS	01109-985711	Sanders Lead Co	1.000	1.000
AL	VISTAS	01097-1061511	Union Cil of California - Chunchula Gas Plant	0:000	0.000
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1.000	1.008
FL	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS FL, LLC.	1,000	
- 11	VISTAS	12017-640611	DUKE ENERGY LICRIDA, INC. (DEF)	0.65	10.63
- 61	VISTAS	12085-900011	FLORDA YOWER & LIGHT (PTT)	1,000	1.008
TL	VISTAS	12035-752/11	GULI POWER - Crist	0.5%	15,70%
FI	VISTAS	12086 3532711	HOMESTEAD CITY UTILITIES	1.000	1,000
F	VISTAS	12031 640211	JIFA:		
FL	VISTAS	12105-717711	MOSAIC FERTILIZER LLC	Cont.	1.000
FL	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	0.500	
FL	VISTAS	12305-919811	MOSAIC FERTILIZER, LLC	0.07	1,000
FL.	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	1.000	1.000
FL	VISTAS	12089-753711	ROCKTENN CP, L.C	1.000	1.000
FL	VISTAS	12005-535411	ROCKTENN CP.LLC	1.000	1,000
FL	VISTAS	12129-2/31/11	TALLAHASSE: CITY PURDOM GENERATING STA.	1.000	1.000
51	VISTAS	12057-538611	TAMPA ELECTRIC COMPANY (1±C)	1,000	1,000
3.1	VISTAS	12085-899911	LARMAC AMERICA LLC	1,800	
FL	VISTAS	12047 769711	WEITE SPRINGS AGRICULTURAL CHEMICALS, INC.	UAL	17.57/0
GA	VISTAS	13127 3721011	Brumwick Cellulese Inc	1,000	1.008
GA	VISTAS	13015 2813011	Ga Power Company Plant Bowen	1.000	1.000
6A	VISTAS	13103-536311	Georgia-Pacific Consumer Products LP (Savannah River Vill)	1,000	1,000
GA	VISTAS	13051-3679811		1.000	1.000
6A	VISTAS	13115-539311	TEV PLE NIAND	1.000	1.000

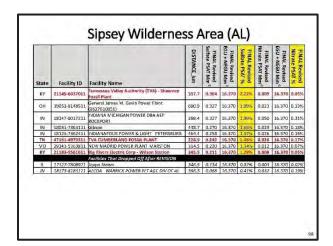


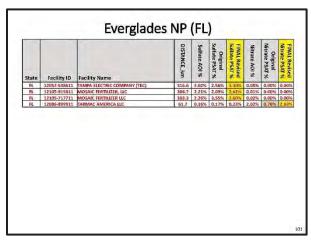
acility State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 Ratio	NOx Rat
KY	VISTAS		Big tivers decirio Corp - Wilson Station	1.000	1.000
KY-	VISTAS	21091 7352411	Century filuminum of KY LLC	0.041	1.008
KY	VISTAS	21177 5195711	Tennesson Valley Authority - Paradise Fossil Plan:	E 00ac	0.736
KY	VISTAS	21145 5037011	Tennessee Valley Authority (TVA) - Shawney Forsil Plant	1.000	1.000
Vis	VISTAS	28059-8184311	Chevrint Products Company, Passagoula Refinery	1.000	1.000
VIS.	VISTAS.	28059-6251011	Mississippi Power Company Plant Victor , Daniel	1.000	1.000
VC.	VISTAS	37037-7920511	Blue Ridee Paper Products - Centon Mill	0.450	0.976
NC.	VISTAS	37117-5049311	Domtsi Paper Company, LLC	1.000	1.000
AC.	VISTAS	37035-8370411	Duke Energy Carolinas, LLC - Marshall Steam Station	E/841	- 10
VC	VISTAS	37013-8479311	PCS Phosphate Company Inc Aurora	1.000	1.000
AC	VISTAS	37023-8513011	SGL Carbon LLC	1.000	1,000
SC	VISTAS	45015-4834911	ALUMAX CL SOUTH CAROLINA	1,000	1.000
50	VISTAS	45043 5598511	INTERNATIONAL PAPER GEORGETOWN V. U.	1,800	1,000
50	VISTAS	45019 4973611	KAPSTONE CLARLESTON KRAFT LLC	1.000	1.008
56	VISTAS	45015 4120411	SANTEL COOPER CROSS GENERATING STATION	1.000	1,000
56	VISTAS	45843 5552811	SANTEE COOPER WINYALLG" NERATING STATION	1.000	1:000
50	VISTAS	45015-3306711	SCESIG WILLIAMS	1:000	1.000
TN	VISTAS	47093-4979911	Cemex - Knoxville Plant	1.000	1.000
TN	VISTAS	47153-3982311	EASTIVAN CHEMICAL COMPANY	1.000	1.000
IN.	VISTAS	47105-4129211	TATE & LYLE, Loudon	21500	11281
TN	VISTAS	47001-6196011	TVA BULL RUN FOSSIL PLANT	0.000	0,000
TN	VISTAS	47151-4979311	TVA CUMBER, AND FOSSIL PLANT	1.000	1.000
TN	VISTAS	4/145-49/9111	TVA KINGSTON FOSSIL PLANT	7.30	0.00
VA.	VISTAS	51027-4034811	Jewell Coke Company L.P.	1,000	1,000
VA.	VISTAS	51580-5/98/11	Meadwestvaco Packaging Resource Group	1.000	1.000
VA.	VISTAS	51023 5039811	Roanuky Cement Company	1.000	1.000

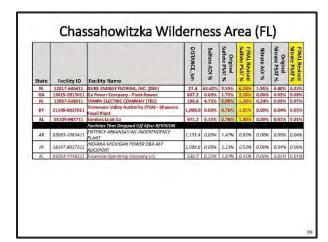
# EXAMPLE: New Madrid Power at SIPS Revised Facility Sulfate PSAT Results Original Facility Sulfate PSAT Results \* SO<sub>2</sub> Ratio\_Facility \* Ratio\_Class\_I\_Area Original Facility Sulfate PSAT Results = 1.46% Revised Facility Sulfate PSAT Results 1.46% \* 0.665 (Slide 94) \* 1.382 (Slide 95) 1.34% (Slide 97)

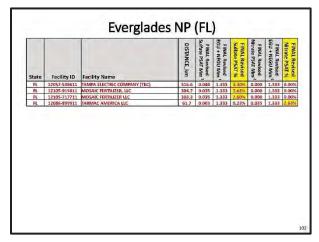


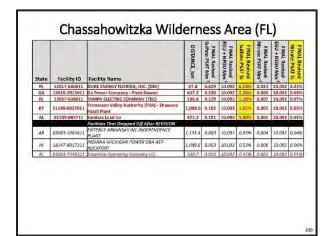


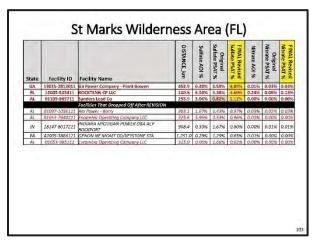


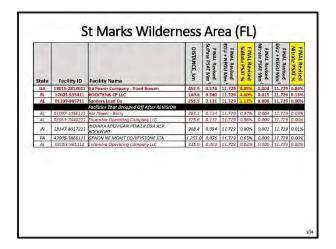


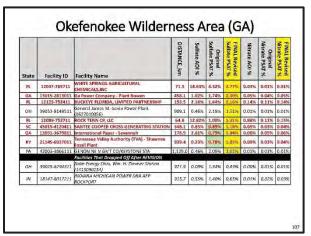


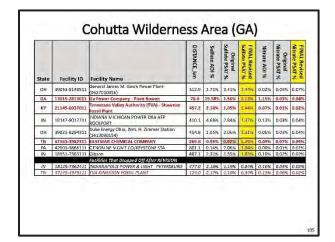


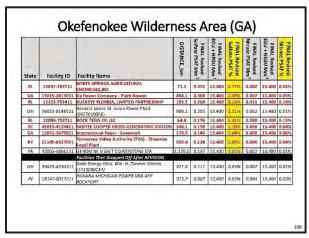


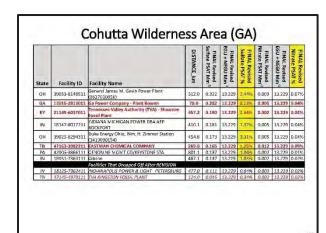


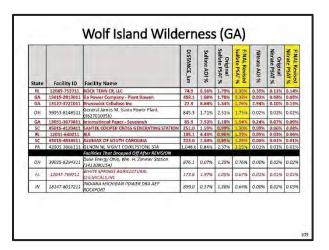




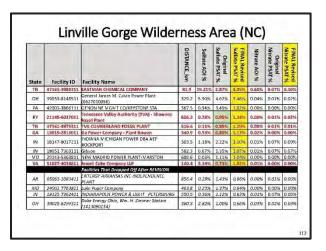


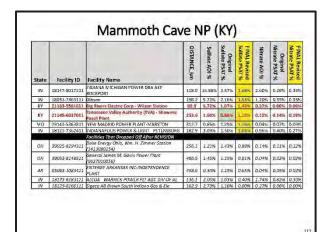


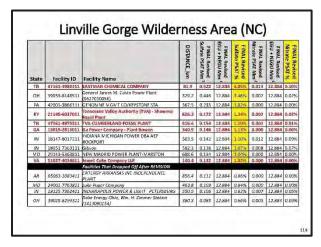


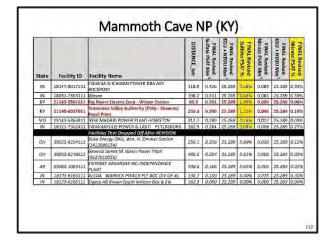


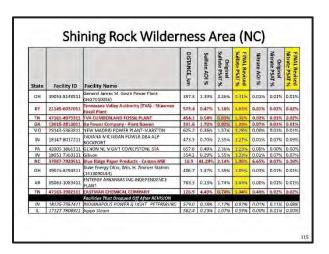
State	Facility ID	Facility Name	DISTANCE_km	FINAL Revised Sulfate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm 1	FINAL Revised Sulfate PSAT %	FINAL Revised Nitrate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm <sup>-1</sup>	Nitrate PSAT %
FL	12089-753711	ROCK TENN CP, LLC	74.9	D.304	12.957	2.35%	0.018	12.957	0.14
GA	13015-2813011	Ga Power Company - Plant Bowen	458.1	0.302	12.957	2.33%	0.007	12.957	0.05
GA	13127-3721011	Brunswick Cellulose Inc	27.9	0.228	12.957	1.76%	0.017	12.957	0.13
ОН	39053 8148511	General James M. Gavin Power Plant (0627010056)	845.3	0.224	12.957	1,73%	0.003	12.957	0.02
GA	13051-3679811	International Paper - Savannah	85.9	9.200	12.957	1.54%	0.012	12.957	0,09
SC	45015-4120411	SANTEE COOPER CROSS GENERATING STATION	251.0	0.168	12.957	1.30%	0.011	12.957	50.0
FL	12031-640211	JEA	105.1	0.167	12.957	1.29%	0.008	12.957	0.06
SC	45015-4834911	ALUMAX OF SOUTH CAROLINA	223.0	0.162	12.957	1.25%	0.001	12.957	0.01
PA	42005 3866111	GENON NEW GWT CO/KEYSTONESTA	1,048.6	0.149	12.957	1.15%	0.002	12.957	0.01
		Facilities That Dropped Off After REVISION							
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	876.1	0.099	12.957	0.76%	0.002	12.957	0.02
FL	12047-769711	WHITE SPRINGS AGRICULTURAL CITE MICALS, INC	173.6	0.087	12.957	0.67%	0.001	12.957	0.01
M	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKFORT	899.0	0.083	12.957	0.64%	0.004	12.957	0.03



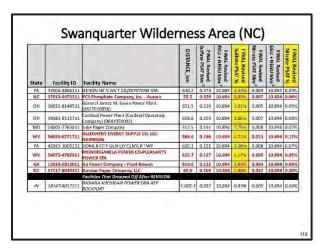


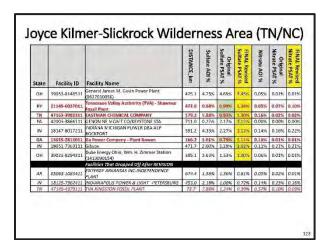


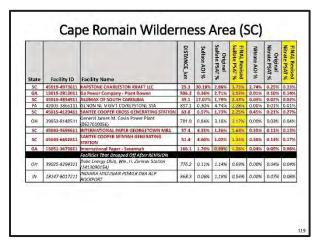


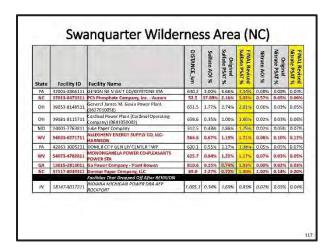


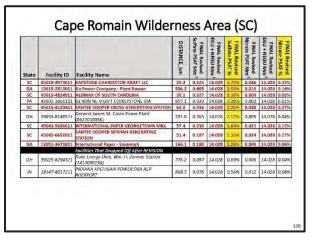
State	Shi	Facility Name	DISTANCE_km	FINAL Revised Sulfate PSAT Mm	FINAL Revised EGU + NEGU Mm	FINAL Revised Sulfate PSAT %	FINAL Revised Nitrate PSAT Mm	FINAL Revised EGU + NEGU Mm	Nitrate PSAT %
ОН	39053-8148511	General James M. Gavin Power Flant (0627010056)	397.3	0.297	12.313	2,41%	0.001	12.313	0.01
KY.	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	573.4	0.201	12,313	1.63%	0.003	12.313	0.02
TN	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	454.1	0.162	12.313	1.32%	0.002	12.313	0.02
GA	13015-2813011	Ga Power Company - Plant Bowen	241.6	0.159	12.313	1.29%	0.001	12.313	0.01
MO	29143-5363811	NEW MADRID POWER PLANT-MARSTON	625.2	0.158	12-313	1.28%	0.001	12.313	0.01
IN	18147-8017211	INDIANA MICHIGAN POWER BBA ALP ROCKPORT	473.3	0.156	12.313	1.27%	0.012	12.313	0.09
PA	42005-3866111	GENON NEW GWT CO/KEYSTONESTA	657.6	0:151	12.313	1.23%	0.000	12.313	0.00
IN	18051 7363111	Gibson	554.2	0.151	12.313	1.23%	0.008	12.313	0.07
NC.	37087-7920511	Blue Ridge Paper Products - Canton Mill	16.5	0.133	12.313	1.08%	0.012	12.313	0.10
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	406.7	0.129	12.313	1.05%	0.002	12.313	0.01
AR	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	783.3	0.129	12.313	1.04%	0.001	12.313	0.01
TN	47163-3982311	EASTMAN CHEMICAL COMPANY	126.9	0.128	12,313	1.04%	0.003	12,313	0.02
		Facilities That Dropped Off After REVISION							
6V	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSRURG	579.0	0.101	12.313	0.82%	0.010	12,313	0.08
12	17127 7808911	Joppo Steam	582.4	0.073	12.313	0.59%	0.000	12.313	0.00



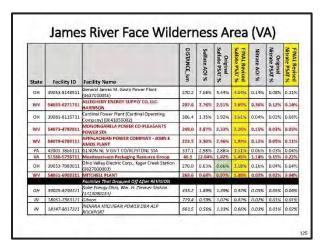




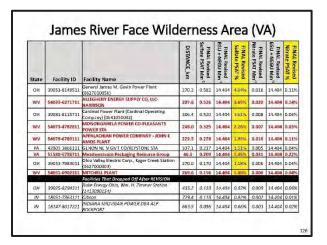


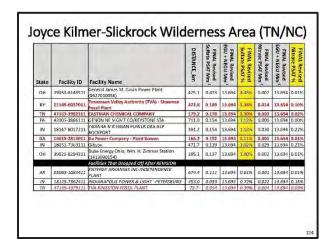


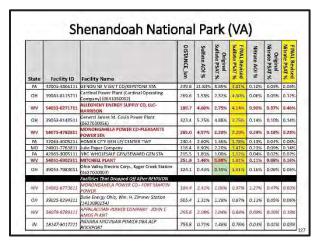
State	Facility ID	Facility Name	DISTANCE_km	FINAL Revised Sulfate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm 1	FINAL Revised Sulfate PSAT %	FINAL Revised Nitrate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm <sup>-1</sup>	Nitrate PSAT %
ОН	39053-8148511	General James M. Gavin Power Plant (0627010056)	400.5	0.520	13,916	3,73%	0.003	13.916	0.02
ку	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	465.3	0.183	13.916	1.32%	0.011	13.916	0.08
TN	47163-3982311	EASTMAN CHEMICAL COMPANY	160.1	0,170	13.916	1.22%	0,007	13.916	0.05
PA	42005-3866111	GENON NE V GN T CO/KEYSTONE STA	688.2	0.186	13.916	1.19%	0.001	13.916	0.015
IN	18147-8017211	INDIANA MICHIGAN POWER DBA ALP ROCKPORT	375.5	0.166	13,916	1,19%	0.035	13.916	0.25
IN	18051-7363111	Gibson	456,3	0.146	13.916	1.05%	0.037	13.916	0.275
		Facilities That Dropped Off After REVISION							
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	360.0	0.136	13.916	0.98%	0.002	13.916	77.5
/N	18125 7362411	INDIANAPOLIS POWER & LIGHT PLTERSBURG	435.6	0.109	13.916	0.78%	0.028	13.916	0.20
AR	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	675.9	0.100	13.916	0.72%	0.001	13.916	0.00
TN	17145-4979111	TVA KINGSTON FOSSIL PLANT	50.0	0.054	13.91€	0.38%	0.004	23.926	0.03



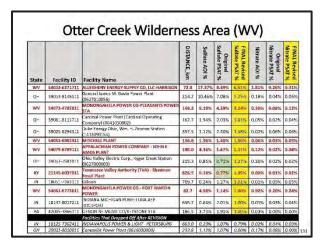
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT%
ÓН	39053-8148511	General James M. Gavin Power Plant (0627010056)	400.5	2.25%	5.10%	3.73%	0.04%	0.02%	0.02
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	465.3	1.34%	0.94%	1,32%	0.02%	0.06%	0.085
TIN	47163-3982311	EASTMAN CHEMICAL COMPANY	160.1	5.01%	0.88%	1.22%	0.19%	0.04%	0.05
PA	42005-3866111	GENON NE WGWT CO/KEYSTONE STA	688.2	0.11%	2.31%	1.19%	0.00%	0.01%	0.01
IN	18147-8017211	INDIANA MICHIGAN POWER DBA ALP ROCKPORT	375.5	4.66%	2,42%	1.19%	0.21%	0.19%	0.25
IN	18051-7363111	Gibson	456.3	1.25%	1.34%	1.05%	0.07%	0.27%	0.27
		Facilities That Dropped Off After REVISION							
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (141309G154)	360.0	1.84%	1.50%	0.98%	0.09%	0.02%	0.02
IN.	18125 7362411	INDIANAPOLIS POWER & LIGHT PLTERSBURG	435.6	1.48%	1.08%	0.78%	0.12%	0.29%	0.20
AR.	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	675.9	D.19%	1.22%	0.72%	0.02%	0.01%	0.00
7/9	17145-4979111	TVA KINGSTON FOSSIL PLANT	50.0	7.38%	1.23%	0.38%	0.71%	0.08%	0.03

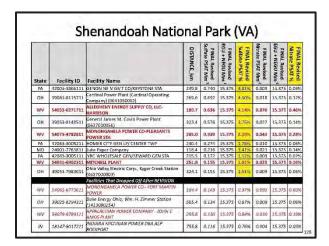


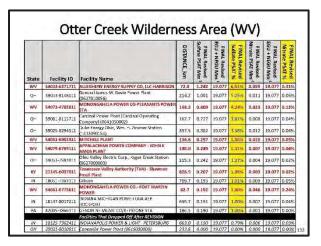




				_				1	
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	83.6	13.58%	4.94%	7.18%	1.36%	0.26%	0.319
0-	39053-8148511	General James M. Gavin Power Plant (0627010056)	233.8	7.62%	6.56%	4:88%	0.10%	0.03%	0.059
wv	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	163.9	4.64%	4.32%	4.19%	0.16%	0.07%	0.109
0-	39081-8115711	Carcinal Power Plant (Cardinal Operating Company) (0641050002)	163.9	1.36%	2.14%	4.02%	0.03%	0.01%	0.039
0-	39025 8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	416.9	1,40%	2.25%	1.49%	0.02%	0.04%	0.059
WV	54051-6902311	MITCHELL PLANT	144.2	1,45%	1.28%	1.42%	0.07%	0.02%	0.055
PA	42005-3856111	GENON NE MGMT CO/KEYSTONE STA	172.8	4.12%	2.43%	1.27%	0.01%	0.00%	0.009
0-	39053 7983011	Ohio Valley Electric Corp., Kyger Creek Station (062/000003)	234.9	0.62%	0.66%	1.18%	0.11%	0.02%	0.029
wv	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	219.8	3.56%	1.45%	1,16%	0.11%	0.01%	0.039
WV	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	79.8	6.53%	1.27%	1,13%	1.07%	0.18%	0.239
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	847.6	0.12%	0.74%	1.05%	0.00%	0.01%	0.029
		Facilities That Dropped Off After REVISION							
l/N	18051 7363111	Gibsun	729.5	0.04%	1.24%	0.99%	0.02%	0.04%	0.049
IN.	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	676.3	0.44%	1.93%	0.97%	0.01%	0.02%	0.035
δN	18125 7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	682.6	0.18%	1.05%	0.77%	0.02%	0.04%	0.039
OH	39031-8010811	Conesville Power Plant (0615000000)	242.3	0.71%	1.09%	0.00%	0.12%	0.08%	0.009







_					ea	1			
State	Facility ID	Facility Name	DISTANCE_km	FINAL Revised Sulfate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm	FINAL Revised Sulfate PSAT %	FINAL Revised Nitrate PSAT Mm <sup>-1</sup>	FINAL Revised EGU + NEGU Mm <sup>-1</sup>	Nitrate PSAT %
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	83.6	1.390	19.349	7.18%	8.059	19.349	0.319
0-	39053-8148511	General James M. Gavin Power Plant (0627010056)	233.8	0.945	19.349	4.88%	0.009	19.349	0.059
wv	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	163.9	0.810	19.349	4.19%	0.020	19.349	0.109
0-	39081-8115711	Carcinal Power Plant (Cardinal Operating Company) (0641050002)	163.9	0.778	19.349	4.02%	0.007	19.349	0.039
0-	39025 8294311	Duke Friergy Ohio, Wm. H. Zimmer Station (1413090154)	416.9	0.288	19.349	1.49%	0.010	19.349	0.059
WV	54051-6902311	MITCHELL PLANT	144.2	0.276	19.349	1.42%	0.009	19.349	0.055
PA	42005-3856111	GENON NE MGMT CO/KEYSTONE STA	172.8	0.246	19.349	1.27%	0.001	19.349	0.009
0-	39053 7983011	Ohio Valley Electric Corp., Kyger Creek Station (062/000003)	234.9	0.229	19,349	1,18%	0.003	19.349	0.029
W۷	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	219.8	0.221	19,349	1.16%	0.006	19.349	0.039
WV	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	79.8	0.218	19,349	1.13%	0.044	19.349	0.239
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	847.6	0.204	19.349	1.05%	0.003	19.349	0.029
		Facilities That Dropped Off After REVISION							
lN .	18051 7363111	Gibsun	729.5	0.192	19.349	0.99%	0.008	19.349	0.045
lN.	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	676.3	0.187	19.349	0.97%	0.006	19.349	0.035
δN	18125 7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	682.6	0.149	19.349	0.77%	0.006	19.349	0.039
OH	39031-8010811	Conesville Power Plant (0615000000)	242.3	0.000	19.349	0.00%	0.000	10.349	0.008

# Non-VISTAS Class I Areas

- Only two VISTAS facilities have a contribution ≥ 1.00% at any non-VISTAS Class I Area
- ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON (WV)
  - Moosehorn Wilderness EDM (1.06% sulfate)
- Tennessee Valley Authority (TVA) Shawnee Fossil Plant (KY)
  - Caney Creek Wilderness Area (1.09% sulfate)
  - · Hercules-Glades Wilderness Area (1.95% sulfate)
  - · Mingo Wilderness Area (1.47% sulfate)
  - · Great Gulf Wilderness Area (1.03% sulfate)
  - Presidential Range-Dry River Wilderness (1.03% sulfate)

State	FACILITY ID STD	FACILITY NAME STD	IMPACTED CLASS LAREAS
AR	05053-1085411	ENTERGY ARRANSAS INCHNOEVENDENCE PLANT	SHRQ
IN	18051/7363111	Gibson	COHU, GRSV., IOYC, U.GO., MACA, OTCR., SIAD SIPS
09	18147-8017211	ND ANA MICHGAN POWER 3BA AEP HOCKPORE	COHE GREV, JOYC, EGO, MACK, CHER, SHAC SIPS
IN	18125-3362411	ND ANAPOLIS POWER & LIGHT PETERSBURG	MACA, SIPS
MD	24001-7763811	Juke Paper Company	SHEN, SWAN
MO	29143-5363811	NEW MADRID FOWER PLANT-MARSTON	LIGO: MACA, SHRO, SIPS
OH	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (064),050002)	DOSO, JARI, OTCR, SHEN, SWAN
OH	39025-8294311	Duke Energy Chio, Wm. h. Zimmer Station (1413090154)	EGHU: DOSG, JOYC, OTCR, SHRO
äн	19053 8148511	General James M. Gavin Power Plant (0527010056)	COFU, DOSO, GRSVI, JAR., JOYC, LIGO, OXEF, OTCR, ROMA, SHEN, SHRO, SHRS, SWAN, WOLF
OIL	19053 7983011	Obic Valley Electric Corp., Kyger Greek Studen (0527000003)	DOSO, JARI, OTCR, SHEN
PA	42005-3865111	GEX DIN NE MIGMT CO/KEYSTIONE STA	COPU, DOSO, GRSW, JAR - 20YC, EIGO, OKER OTCR, ROMA, SHI'N, SHRO, SWAN, WO F
PA	42883 2085211	IOMERITY OF N. PACENTER TWP	S IFN, SWAN
PA	42053 3005111	YRG WHILLISALL GLY/SLWARD GLY STA	SIIN

## Additional Considerations

- The final list of four-factor analysis sources will be determined in consultation with the FLMs, EPA, other states, and stakeholders.
- Some VISTAS states may perform additional fourfactor analyses for sources not listed on Slide 134.
- States will verify projected SO2 and NOx emissions with facilities. PSAT results can be adjusted to match.
- Some states may allow their facilities to take a permit limit that will result in adjusted PSAT impacts below the 1.00% threshold in lieu of performing a four-factor
- The large number of coal-fired EGU retirements and fuel switching from coal to natural gas need to be considered along with the sources selected for the four-factor analysis. States should not be penalized for early action.

State	FACILITY ID STO	FACILITY NAME STD	IMPACTED CLASS LAREAS
AL	01109-985711	Sanders Lead Co	CHAS, SAMA
FL	12173-752411	BUCKEYE FLORIDA: LIMITED PARTNERSHIP	CAFF
FI	12007 620601	DUKE ENERGY FISHDA, ING. (DEF)	CHAS
FL	12031-600211	1EA	Wolf
FI.	1/108-/17/11	DENSAIC PERTICUENTO.	EVER.
FL	12105-919811	MOSAIC FERTILIZER, LLC	EVER
FL	12089-753711	ROCK TENN OP, LCC	ONE WOLF
F)	17005-535411	ROCKTENNOPLIC	SAMA
FL.	12057-538611	AMPA ELECTRIC COMPANY (TEC)	CHAS, EVER
FL	17086-893911	TARNIAC AMERICA LLC	EVER
FL	12047-769-11	WHITE SPRINGS AGRICULTURAL CHEMICALS INC.	OREK
GA	13327-3721011	Brunsvick Cellulose Inc	WOLF
-GA	13019-2313011	Ga Power Company - Plant Bowen	CHAS, COHU, JOYC, LIGO, OKEF, ROMA, SAMA, SHRO, SWAN, WOL
GA	13051 3579811	International Paper Savarnah	OKTE, BONIA, WOLF
KY	21183-9561611	Birt Rivers Electric Corp - Wilson Station	MACA, SIRS
BY	21145.6097011	Tennessee Valley Auctority (TVA) Sharence Fresh Plans	CACR, CHAS, COHL, DOSO, 68GL, GRSM, HEGL, KWC, HGO, MAG. MING, UKEF, UTCS, PROR, SHRO, SIFS
100	37087-7920511	Blue Hidge Paper Products - Canton Mill	SHRO
NC	37117-8049311	Dointai Paper Company, LLC	SWAN
NC	3/013-34/9311	PCS Phosphate Company, Inc Autora	SWAN
SC.	45015 4834911	ALUMAX OF SOLITH CAROLINA	ROMA, WOIF
90	15013-5658611	INTERNATIONAL PAPER GEORGE, OWN MILL	EOMA
30.	45019 4573611	KAPSTONE CHARLESTON KRAFT II C	ROWA.
30	45015-4120421	SANTEE COOPER CRUSS GENERATING STATION	OKE, ROMA, WOLL
SC	45843-5852811	SANTER COOPER WINVAH GENERATING STATION	ROMA
TN	4/163-3982311	EASIMAN CHEMICAL COMPANY	COHU, GRSM, JOYC, BCO, SHKO
TN	47161-4979311	TVA CUIV BERLAND FOSSIL PLANT	LIGO, SHRO, SIPS
VA.	51027-0034811	Jewell Coke Company LU <sup>2</sup>	HSU:
VA.	51580 5798711	Meacavestvario Packaging Remouser Group	JARI
WY	54033-6271711	PLUEGHENY EMERCY SUPPLY CO., LLC-HARRISON	DGSO, JARL MGOS, OTCR, SHEN, SWAN
WV.	54079 6789111	APPALACHIAN FOWER COMPANY - JOHN F AMOS FLANT	GOSO, IARI, DTCR
WV	54051-6962311	MITCHELL PLANT	DOSO, JARL OTCR, SHEN
WV	34061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	DOSC, DTCR
WV	54073-4787811	MONON GAHELA POWER CO-PLEASANTS POWER STA	DOSO, JARY, OTCR, SHEN, SWAR

# **Next Steps and** Schedule

# EPA Guidance (August 20, 2019)

- Many facilities already have effective emission control technologies in place. States will consider control options for these facilities on a case-by-case basis.
  - For the purpose of SO, control measures, an EGU that has add-on flue gas desulfurization (FGD) and that meets the applicable alternative SO<sub>2</sub> emission limit of the 2012 Mercury Air Toxics Standards (MATS) rule for power plants. The two limits in the rule (0,2 lb/MMBtu for coal-fired EGUs or 0.3 lb/MMBtu for EGUs fired with oil-derived solid fuel) are low enough that it is unlikely that an analysis of control measures for a source already equipped with a scrubber and meeting one of these limits would conclude that even more stringent control of SO<sub>2</sub> is necessary to make reasonable progress."
  - necessary to make reasonable progress."

    For the purposes of SO, and NOx control measures, a combustion source (e.g., an EGU or industrial boiler or process heater) that, during the first implementation period, installed a FGD system that operates year-round with an effectiveness of at least 90 percent or by the installation of a selective catalytic reduction system that operates year-round with an overall effectiveness of at least 90 percent (in both cases calculating the effectiveness as the total for the system, including any bypassed flue gas), on a pollutant-specific basis."

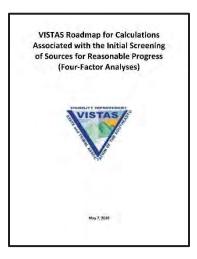
Remaining VISTAS Work Schedule

Task	Schedule
2028 Point Emissions Updates	Completed *
2028 Emissions Processing	Completed *
2028 CAMx Modeling	Completed *
2028 Visibility Projections	Completed *
2028 Deposition Projections	Late-May/Early-June, 2020 *
Final Reports and Documentation	Late July, 2020
Website Updates and Postings	Late July, 2020
End of Contract	September 30, 2020
Regional Haze SIPs Due to EPA	July 31, 2021

# **Contacts for Further Information**

- For general, technical, and SIP-related questions, contact the TAWG and CC Chairs:
  - TAWG Randy Strait (<u>randy.strait@ncdenr.gov</u>)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
- For project and contract management questions, contact the Project Manager:
  - John Hornback (hornback@metro4-sesarm.org)





[Wind Street Comparison Spreads by Proceedings (2020)

## Task 5: Area of Enfluence Analysis hittps://www.mictrs6.ppgcm.otas/content/task/6-area innivence oncesis

"ADI Data Sammany" WATES ADI DATA SHAMMAN AND A

# Trollekusal VISTAD Class I Area Ross Her" and "Arebylus I Ress VISTAD Class I Area Results H: \$\( A\_i - \)\$prony Wildermore Area, cite \( i\) and (AR - County Creek Wildermore Area, cite \( i\)

- The Child "Account comme bodies mean mata and distinct and a comment of the comme
- the data of modelness are constructed and the second described and the construction of the second of

"PSAI Source Apportunism Besults Summery - April 2020" FESTAS PSAT Summ Apport Novello April 2020(A)

The This had deed to disk show a walk and timbe is the cultural The Thinks with the angle of 2000 contains. Of the time is a soul for Date in and it times. The should be a for the time and the state of the state o

- Noticed BOU Self-in PSAC Resolve On gir all BOU Self-out PSAT Resolve On y BOU Self-out PSAT Resolve Off-one SECUSED, resolve (No. 100 Secus BOUSED) or house to
- George McGit and et- Price associate Diagnol 8, 612, Sulfage, Str. Becaute Str. 9, 12, 16, pt. orders, 20, 2013, artists of Price and Artifact Str. artists.
- Increase the Representation of the Control of the Con
- Rossed (6590 Nibros PSA" Rosello Original (6590 Nibros PSAT Rosello Nos Nibros Nibr

Table Tech Series (ORI 15 - ID) and Serb Nettle (ORIN SEX) were expanded parasitive for the record (ORIN MET NEUTRON). (OUR Here, and field on the continuous Color of the Col

This note: it lesson to collect the natal person transfer on or occur class leave in 1956 if Person't Contribution Rankings - April 2027. The introduce shown in Appendix Cipage St.

"PEAT Paramet Contribution Reviews - April 2020" "PUTAL FEAT France's Contribution Remains - April 2020, No. 1

Orlaws III 80 cr: the organi PSAT results.

Crignal -coley Nitrale PS-1 Control core (5) (see the Nitrale PS-1 Control-core (Nim\*)): (Intal 9 (Int

Sovied Facility NR von 1541 Receille Riv - Original Facility Nibrato (NAT Repairoid) 1 (NOS Ratio, Facility 1 (NOS Ratio), Facility 1 (NOS Ratio), Receille Class 1 (NOS Ratio), Receille 1 (NOS Ratio

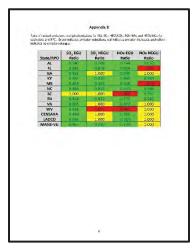
Annual Profits of Annual Profi

the factor and may tell a some work weak seed to the research of the factor of the fa that AC as the Copy of resolution over time computer with the AC coulds in the region (SA) resolution of the Copy of the Copy

Take of revised terrolation 200 and 400 consistent for the 67 facilities, yet 17547 steel. Grow sind cakes

	1 ( cub to 17 )	TANKEY BUT	MARY MARC RD	1200 (49)	I HOURS
4	where.	PRINTERS T	to high south	11.00	5-M
- 4	3/2/4	0.067 77381	Chiffeen Away	T-1000	146
- 4	3 (27)	(F#20 450)	Yester Street Care DC	Artec	obs
-11	1300	Marc 184.5	4.6.00000 MARQO	146	100.50
- 4	- 427X	6067521	Terrete Connect Control H.	1000	- 24
-41	¥5145	100,145,023	Surve Coule; Cror; 10	11134	102
- 0	¥ 1006	DESCRIPTION.	A creatile exist.	1000	- 36
- 4	V.9945	Litters. 1	ACCUSATION OF THE PARTY OF THE	1147	- 44
- 4	* W.	100,27,00,00	Arrest in Survey Canada Go Br	1790	128
-	43/45	Mar sala	LARY, WORLD'S DOOR SHIP	1.90	5.50
	A MINE	APPARET.	WOLDHOOD KINNINGSY- II	1.40	
	+ 5045	12034 86.3	SHIPPACK ROPE RESERVE		
	47.664	MOTHER	DAMESTO DE LES PROPERTOS	1797	- 27
	7 5000 7 5000	MERCETT	DOMESTIC CONTRACTOR		-
		1005372271		180	
1,44	× \$145	TOWN COME.	M.		
	2 Sta	DE21541	2004 CB 0441		
			ASSAU TORON, M		
-	× 9//	13165,3431	WARREST THEOREMS	-	- 0
_	V 3055	35.67164.7	000 9 2 85 2 MAN 1 500 AC	1/80	- 20
	****		OUT WHILE	DIRE	- 24
	+ 948	32852343	KSHPETPEC	11181	- 30
	+ 100 A	1000000	12 year-remining or regularity	1.000	- 28
	1906	127725301-1	TABLE OF BUILDINGS (BOD)	0.000	- 01
		DAMEST			
	×3246	LAW SECT	AND TO A SECURE OF THE PROPERTY.		
	+1000	101/10/11	Asserted Condenses	1.00	- 35
- 01	2-202	De 25800	Shows Stone: Not have	1181	
	5.025		Compa facts Geography (and Palatoria Flore) F		- 20
3	# 3550 # 3550	3935-586.3	DANIES SAME	1.00	200
is to See	Fredher BSC	300 50 0 300 500 0	NAME OF	130 large	.04
n be lore	Fredher RES	100 to 10	CONTRACTOR	1.0	HC 6
is the lone	Fred to BSC	100 to 10 100 to 10 10 to 10 10 10 to 10 10 to 10 10 10 to 10 10 to 10 10 10 to 10 10 to 10 10 10 to 10 10 to 10 10 10 to 10 10 to 10 10 10 to 10 10 10 to 10 10 to 10 10 to 10 10 to 10 10 to 10 10 to 1	WIN AND OR 100 CONTRACTOR OF THE PARTY OF TH	130 large	.04
is to loo	Fredle: 865 - 1005 - 1005 - 1005	1001 50 50 300 500 1 100 500 1 100 70 70 100 70 70 100 70 70	Production of the Control of the Con	530 hran 1.00	H'c fa
is the last	Field to 1000 4 0000 4 0000 4 0000 4 0000 4 0000 4 0000	PERMIT	PARTITION OF THE STATE OF THE S	530 Resis 1 de:	Hr. e
in the local	# 3050 # 3050 # 3050 * 1050 * 1050 # 1050	780, 5000 300 500 3 750 500 3 750 500 3 750 500 3 750 500 500 200 500 500 200 500 500	PARTY MAN COM- MERCH MAN COM- MERC MAN COM- MERCH M	530 bets 1,00 1,00 1,00	West
E be lan	# 3050 # 3050 # 3050 * 1050 * 1050 # 1050 # 1050 # 1050	100 0-10 101-12-1 10-1-12-1 10-1-12-1 10-1-12-1 10-1-12-1 10-1-12-1 10-1-12-1	HARM TOUGH SCHOOL TOUR TO SCHOOL TOUR TOUR TOUR FOR THE SCHOOL TOUR TOUR FOR THE SCHOOL TOUR TOUR FOR THE SCHOOL TOUR TOUR TOUR TOUR FOR THE SCHOOL TOUR TOUR TOUR TOUR TOUR TOUR TOUR FOR THE SCHOOL TOUR TOUR TOUR TOUR TOUR TOUR TOUR TOUR	530 Resis 1 de:	H'c fa
to be fore	# 300/de # 300/de # 300/de # 300/de # 300/de # 300/de # 300/de	PRODUCT STATE OF STAT	THE PROPERTY OF THE PROPERTY O	530 bran 1 dr 1 dr 1 dr 1 dr	HCc5
to be form	# 3050 # 3050 # 3050 # 3050 # 3050 # 1050 # 1050 # 1050 # 1050	186, 5-10 1011-1271 10	Harder (1990)  **Control (1990	530 bets 1,00 1,00 1,00	West
E by land	# 2000 # 2000 # 2000 # 2000 # 2000 # 2000 # 2000 # 2000 # 2000	PERMANENTAL STREET, ST	Treatment of the Control of the Cont	100 byte 100 byte 100 100 100 110 110	Wes.
E by lone	# 866 # 865 # 866 # 866 # 866 # 866 # 866 # 866 # 866 # 866 # 866	150, 5-10 100, 207, 1 170, 270, 2 2 00, 227, 2 2 10, 227, 2 2 10, 227, 2 2 10, 227, 2 2 10, 207, 2 2 10, 207, 2 2 10, 207, 2 2 10, 207, 2 2 10, 2 2 10	THE MINISTER OF STREET OF THE	100 hpp. 100 hpp. 100 hpp. 100 hpp. 100 hpp. 100 hpp. 100 hpp.	West.
E be loss	# MAG Fredrey Ref: # MAG #	100, 50, 80 100, 50, 51 100, 70, 70 100, 70 1	THE DESCRIPTION OF THE PROPERTY OF THE PROPERT	100 hate 100	H'ot
E Prime	# MAG   Tredit   RES # MAG # MAG	388, 5-10 103, 102, 1 1-1, 10	THE BLACK THE STATE OF THE STAT	100 (100 (100 (100 (100 (100 (100 (100	West
E Primire	# Mide   Treate   RES   # Mide 	320, 50 (0) 1013 (0) (1) 10 (1) (0) (1) 10 (1) (0) (1) 10 (1) (1) 10 (1) 10 (1) (1) 10 (1) 10 (1) (1) 10 (1) (1) 10 (1) (1) 10 (1) (1) 10 (1) (1) 10	THE METANO  **CHEMON TO  **CONTROL TO THE DESTRUCTION  **CONTROL TO THE DESTRUCTION  **CONTROL TO THE TOTAL TO THE  **CONTROL TO THE  **CONT	100 byte 100 byte 100 100 100 100 100 100 100 100 100 10	Waste and a second
E Primary	# Mide   Tredit   1955   2 1956   2 1956   4 1956   5 1956 	320, 50-30, 1033-1034-1034-1034-1034-1034-1034-1034-	THE MEAN OF THE PARTY OF THE PA	100 hrs. 100 hrs.	Wes
E la land	# Middle   100     Find to   100     # 100	300, 50 (0) 100 (0) (0) 10 (0) (0) (0) 10 (0) (0) (0) 10 (0) (0) (0) (0) (0) (0) 10 (0) (0) (0) (0) (0) (0) (0) 10 (0) (0) (0) (0) (0) (0) (0) (0) 10 (0) (0) (0) (0) (0) (0) (0) (0) (0) 10 (0) (0) (0) (0) (0) (0) (0) (0) (0) (0	THE MILES OF THE PROPERTY OF T	100 hayes 100 hayes 100 hayes 100 hayes 100 hayes 100 hayes 100 hayes 100 hayes	H C S
E Primary	# Miles Feeling Ref. # Miles #	Table   Sec 100   Table   Se	THE	100 hate 100	H(c)
E Training	# Miles  Feel to 180  # Color  # Miles	100 0 00 00 00 00 00 00 00 00 00 00 00 0	THE THE TOTAL OF THE THE TOTAL OF THE TOTAL	100 been 100	H CO
Extraordinates	# mide   Fresh   165   # mide   # mide	100 - 50 00 100 100 100 100 100 100 100 100 1	DEMONSTRUCTURE  OFFICE AND THE STATE  OFFI AND THE	120 hrs. 140	i i i i i i i i i i i i i i i i i i i
by by least to the least	# MARC   100	100 0 00 00 00 00 00 00 00 00 00 00 00 0	DAME (1990)  THE STATE OF THE S	100 been 100	H CO
in the last of the	Feder 100  - 2005 - 200	1904 50 80 1905 190 190 1905	THE TABLE OF THE T	100 mm 10	Wat
Extra large	Finding 1802   Find	100 (100 to 100	THE TABLE OF TABLE OF THE TABLE OF TABLE O	100 mm	i iras
20 br 2 corr 2 c	Fields 100  - 200	Dec   0.00.     Dec   0.00.     Dec   0.00.     Color   0.00.	THE STATE OF THE S	100 mm 10	Wat
10 Pr 2007	# mide    Fueller 185*     # 205-0	1901 0-100 100	COMPANY OF THE COMPAN	100 me 10	West
E Promise	Finding   165     Conting	The Local Control of the Control of	THE THE COMMAND OF TH	100 me 10	H css
10 Pr 2007	# mide    Fueller 185*     # 205-0	1901 0-100 100	COMPANY OF THE COMPAN	100 me 10	West





State	klass I Area	Ratio Class   Area
	Soony Valoriars sarro	252
Fi.	Chasas Speritina Wilcomess Area	0.325
- 12	Leggaces NP	- (9)
T.	St. idant's 95lithermes Zrea	63
GA.	Co satts Wile erness Arca	1,262
SA	Okcior okea Willremess Araz	1,817
138	walf ideal Wilderness	- 1
360	Marriage In County	538
tar .	Jiny a Gorge Wilcorness Aspo	120
Nr.	on large de de sole emessiones	1400
160	polarigit arter (A) dernets Area	0.56
.80	Cape Standar Williams sc	1,507
TN	Grantimeky Meuritains \?	1,854
19	Ayre Rilere-Sucuraci Wilderness	238C
565	torins. Conting e Wilderness	7.6 6
124	Signature Co. Co.	1,863
100	Dolly Sods Wilderness	33/3
0.0	Etter Creek Valoerreis.	187
An.	Carry Freed Willerman Awa	
A.S.	Oppor Bultislo Wildomoss Arca	1,490
A	Breton Wilderness	1200
M	Startie Nath malifierk	1.00
NAT Ser	Massehan Wildermas FDM	1,47
	banay Wilcamoss Area	1,163
N/O	He vo. less Glades Will dermess Area.	SAR
N/O	Miny, Wildensey Area	1.9%
	Grandy Il Wilderness Area	263
51	Presidentici Rango Dry River Willicomess Britantine Wildermess Area	1,862
V2	he Roa's Wildensen	141
×.	Jackica Commenters	141

# Appendix F-3k - VISTAS Regional Haze Project Update Stakeholder Briefing May 20, 2020

# VISTAS Regional Haze Project Update



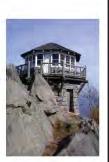
Stakeholder Briefing Jim Boylan May 20, 2020

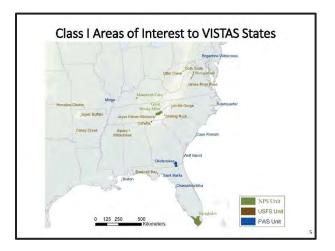
# **VISTAS Organization**

- State and Tribal Air Directors (STAD)
  - · Policy Decisions
- · Michelle Walker Owenby (TN), Chair
- Coordinating Committee (CC)
  - · Planning Recommendations
  - · Jim Boylan (GA), Chair
- Technical Analysis Work Group (TAWG)
  - · Technical Recommendations
  - · Randy Strait (NC), Chair
- Project Manager
  - · John Hornback (SESARM)

# Outline

- · Background Information
- 2028 Emissions Updates
- 2028 Model Projections
- Adjusted 2028 PSAT Stacked Bar Charts
- Reasonable Progress Screening Analysis
- Next Steps & Schedule





# Regional Haze Background Information

- Initial round of regional haze SIPs were due December 17, 2007
- Regional haze SIPs for second planning period due July 31, 2021
- EPA revised regional haze regulations
  - 40 CFR Part 51 and 40 CFR Part 52
  - Revisions effective January 10, 2017
- Current EPA regional haze guidance
  - December 20, 2018 Tracking Visibility Progress
  - August 20, 2019 Regional Haze SIPs for the Second Planning Period

# VISTAS Class I Areas VISTAS Class I Areas AL – Sipsey Wilderness Area (SIPS) EL – Chassahowitzka Wilderness Area (CHAS) EL – Chassahowitzka Wilderness Area (CHAS) EL – Everglades National Park (EVER) EL – Saink Marks Wilderness Area (CAMA) GA – Cohutta Wilderness Area (CHU) GA – Odorenoke Wilderness Area (COHU) GA – Odorenoke Wilderness Area (COHU) USDA Forest Service USDI Fish and Wildlife Service USDI Forest Service USDA Forest Service USDA Forest Service USDA Forest Service USDI Fish and Wildlife Service USDA Forest Service USDA Forest Service USDI Fish and Wildlife Service USDI Forest Service USDI Forest Service USDA Forest Service VA – Shenandosh National Park (SHEN) WV – Dolly Sods Wilderness Area (OSSO) WV – Otter Creek Wilderness Area (OSSO) WV – Otter Creek Wilderness Area (OTCR)\*

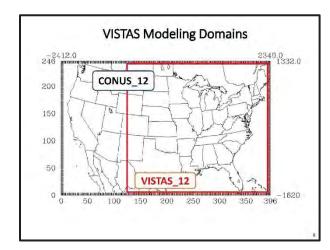
# VISTAS Air Quality Model

- Started with EPA's 2011/2028 modeling platform
  - · Version 6.3el
  - CAMx v6.32
- Replaced CAMx v6.32 with CAMx v6.40
- Used 2011 meteorology
- · Reasons for using EPA platform
  - Time limited
  - · Budget limited
  - Most source sectors acceptably represented in EPA platform

# Initial VISTAS vs. Updated EPA 2028 Emissions

 The table below compares the 2028 point emissions used by VISTAS vs. the latest 2028fh emissions used by EPA (projected from 2016). The emissions below are extracted from the VISTAS 12 modeling domain which covers the Eastern U.S.

Pollutant	VISTAS 2028 (tpy)	New EPA 2028 (tpy)	Change (tpy)	Change (%)
NOx	2,641,463.83	2,108,115.50	-533,348.33	-20.19%
SO2	2,574,542.02	1,400,287.10	-1,174,254.92	-45.61%



502	2.7opt_2028	16.0_2028	∆ SO2	∆ SO2
CENSARA	760,828.2	367,683.7	-393,144.5	-51.67%
LADCO	379,577.5	266,047.0	-113,530.5	-29.91%
ANE-VU	196,672.6	78,657.0	-118,015.6	-60.01%
VISTAS	273,582.1	161,502.5	-112,079.6	-40.97%
TOTAL	1,783,376.5	976,471.2	-806,905.3	-45.25%
NOx	2.7opt_2028	16.0_2028	Δ ΝΟχ	ΔNOx
CENSARA	354,795.1	244,499.3	-110,295.8	-31.09%
LADCO	198,966.9	166,429.4	-32,537.4	-16.35%
MANE-VU	83,432.5	56,315.3	-27,117.2	-32.50%
VISTAS	270,615.7	200,791.1	-69,824.6	-25.80%
TOTAL	1,166,663.1	840,973.6	-325,689.5	-27.92%

# **Initial VISTAS Emissions Updates**

- Used EPA's 2011 base year emissions without change
- Updated EPA's Initial 2028 projection year emissions
  - EGU and major non-EGU sources
  - Removed Clean Power Plan assumptions
  - VISTAS Adjusted for changes in fuels and facility operating plans
  - Non-VISTAS Used ERTAC 2.7opt



# VISTAS CC/TAWG Conclusions (January 2020)

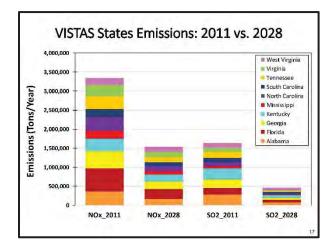
- 1. 2028 emission updates are necessary
  - VISTAS States States will:
    - Update 2028 major source emissions projections (SO<sub>2</sub>, NOx, PM<sub>2.5</sub>, PM<sub>10</sub>, NH<sub>3</sub>, CO) at the facility and unit level
    - · Add any new sources of significance
  - LADCO States SESARM will:
  - Replace ERTAC\_2.7 with ERTAC\_16.1 based on LADCO input
  - All Other States SESARM will:
    - Replace ERTAC\_2.7 with ERTAC\_16.0
    - Verify accuracy of large SO<sub>2</sub> and NOx source emissions projections via contact with surrounding states/RPOs and update emissions as needed
- Additional 2028 air quality modeling is needed

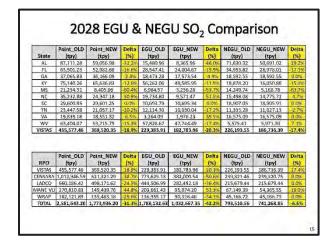
# Additional Modeling-Related Tasks

- · Emissions processing
- Updated 2028 CAMx modeling (VISTAS\_12)
- · Updated 2028 visibility projections
- Documentation

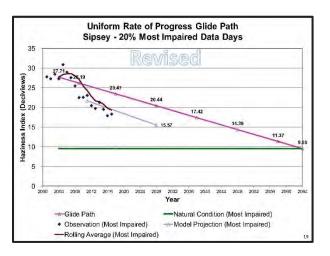
	202	O EU	ه د	NEG	U NO	X C	ompai	ison	
State	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpv)	Delta (%)
AL	80,389.97	70,824.72	11.9%	26,895.35	20,008.14	25.6%	53,494.61	50,816.58	-5.0×
FL	68,006.19	70,010.40	2.9%	26,250.73	25,049.90	-4.6%	41,755.45	44,960.50	7.7%
GA	67,197.50	65,885.55	2.0%	25,899.67	24,587.73	5.1%	41,297.83	41,297.83	0.0%
KY	66,240.03	62,130.83	-6.2%	36,781.72	32,695.94	-11.1%	29,458.31	29,434.89	-0.1%
MS	52,159.32	46,853.62	-10.2%	18,279.53	12,208.89	-33.2%	33,879.79	34,644.73	2.3%
NC-	65,863.97	58,933.80	10.5%	27,842.23	20,977.65	24,7%	38,021.74	37,956.15	0.2%
SC	36,051.31	36,170.87	0.3%	10,522.78	10,707.42	1.8%	25,528.53	25,463.44	-0.3%
TN	45,879.07	42,954.25	-6.4%	10,086.01	7.814.13	-22.5%	35,793.06	35,140.12	-1.8%
VA	43,210.19	41.671.99	3.6%	11,973,97	10,435.77	12.8%	31.236.22	31,236.22	0.0%
WV	65,054.07	68,200.77	4.8%	46,721.77	49,874.15	6.7%	18,332.30	18,326.62	0.0%
VISTAS	590.051.60	563,636.80	-4.5%	241,253.76	214.359.73	-11.1%	348,797.84	349.277.07	0.1%
RPO	Point_OLD (tpy)	Point_NEW (tpy)	Delta (%)	EGU_OLD (tpy)	EGU_NEW (tpy)	Delta (%)	NEGU_OLD (tpy)	NEGU_NEW (tpy)	Delta (%)
VISTAS	590,051.60	563,636.80	4.5%	241,253.76	214,359.73	11.1%	348,797.84	349,277.07	0.1%
CENSARA	903,979.85	791,397.59	12.5%	382,706.66	270,182.46	29.4%	521,273.19	521,215.14	0.0%
LADCO	548,866.74	491,345.00	-10.5%	244,035.26	186,513.52	-23.6%	304,831.49	304,831.49	0.0%
MANE VU	244,280.15	222,991.41	8.7%	103,465.15	82,176.41	20.5%	140,815.00	140,815.00	0.0%
WRAP	362,819.80	301,433.41	-16.9%	187,944.97	126,558.55	-32.7%	174,874.83	174,874.86	0.0%
TOTAL	2,649,998.14	2,370,804.22	-10.5%	1,159,405.80	879,790.66	-24.1%	1,490,592.35	1,491,013.55	0.0%

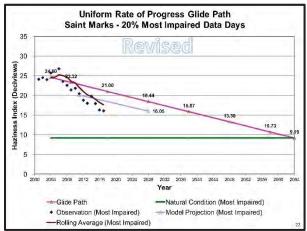
# Recent 2028 Emissions Updates

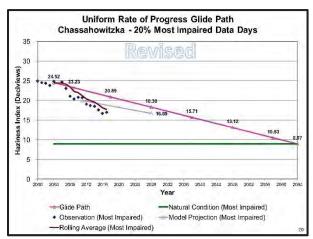


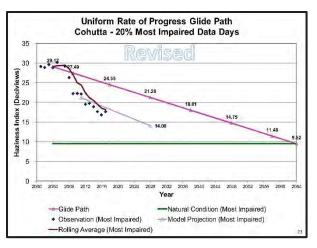


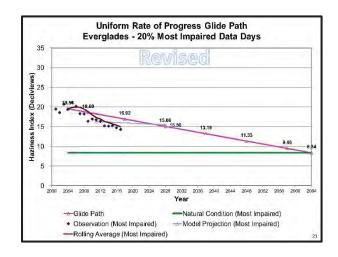
# 2028 Model Projections

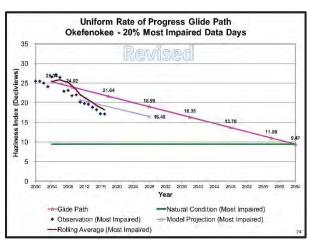


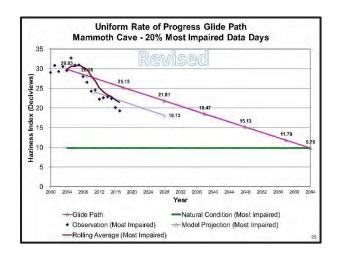


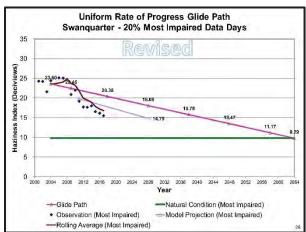


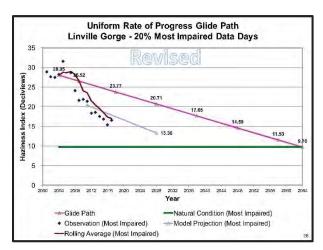


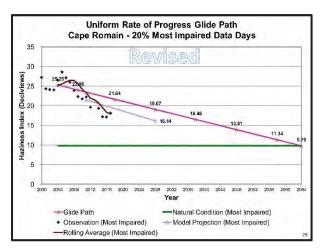


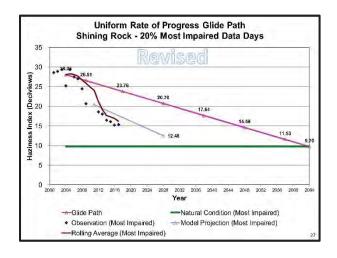


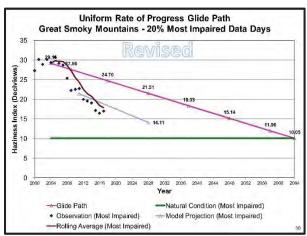


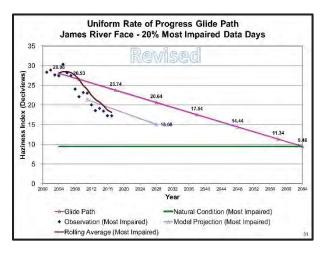


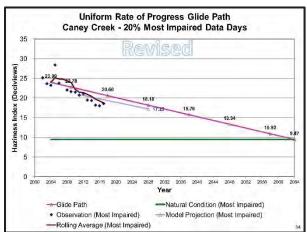


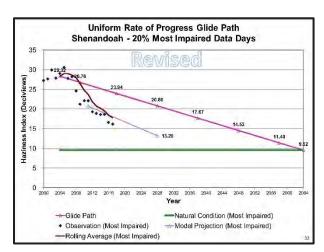


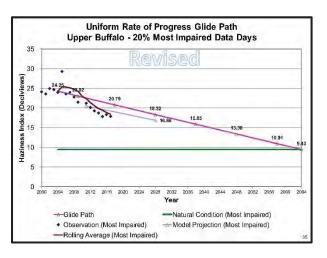


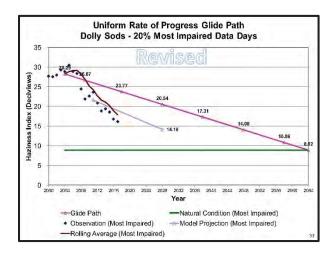


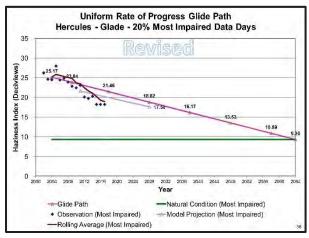


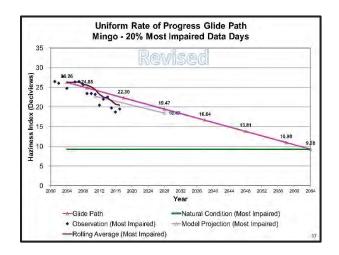






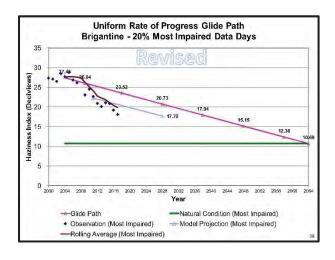






# **PSAT Source Apportionment Modeling**

- PSAT = Particulate Matter Source Apportionment Technology
- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- · Used for further evaluation of AOI results
- Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission
- · VISTAS contract with ERG allows for up to 250 tags



# PSAT SO<sub>2</sub> and NOx Tags (209)

- Round 1 (122 tags)

   Total SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- Total NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags
- NOx tags for individual VISTAS facilities = 20 tags

## Round 2 (87 tags)

- Non-EGU point SO<sub>2</sub> for 10 individual VISTAS states + 3 RPOs = 13 tags
- Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags
- SO<sub>2</sub> and NOx for N/S/W/E boundaries = 8 tags
- SO<sub>2</sub> tags for individual VISTAS facilities = 10 tags
   NOx tags for individual VISTAS facilities = 16 tags
- SO, tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags

Adjusted 2028 PSAT Stacked Bar Charts

# Revised State/RPO PSAT Results

Revised EGU Sulfate PSAT Results

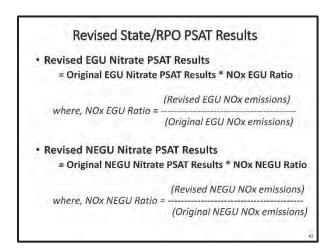
= Original EGU Sulfate PSAT Results \* SO, EGU Ratio

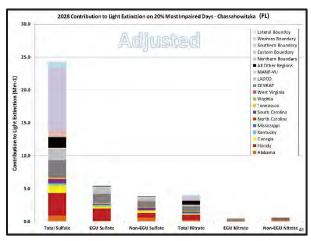
(Revised EGU SO2 emissions) where, SO<sub>2</sub> EGU Ratio = (Original EGU SO, emissions)

**Revised NEGU Sulfate PSAT Results** 

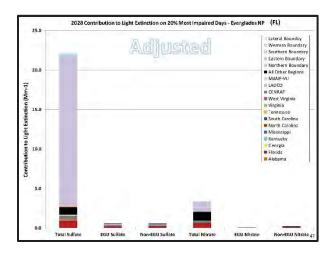
= Original NEGU Sulfate PSAT Results \* SO, NEGU Ratio

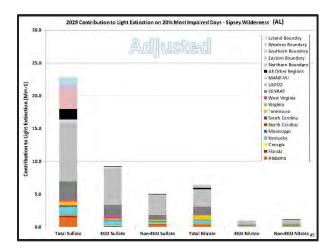
(Revised NEGU SO, emissions) where, SO, NEGU Ratio = (Original NEGU SO2 emissions)

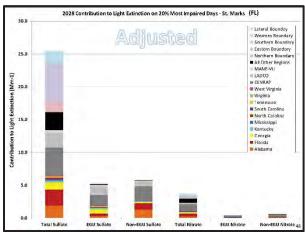


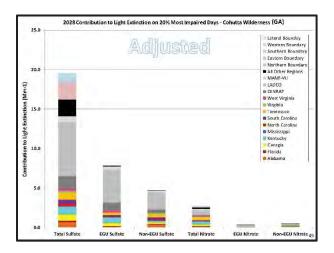


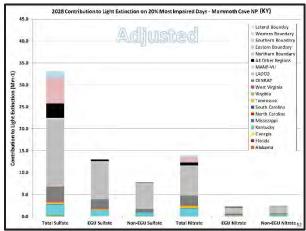
State/RPO	SO <sub>2</sub> EGU Ratio	SO <sub>2</sub> NEGU Ratio	NOx EGU Ratio	NOx NEGU Ratio
AL	0.540	0.708	0.744	0.950
FL	0.841	0.829	0.954	1.077
GA	0.951	1.000	0.949	1.000
KY	0.881	0.850	0.889	0.999
MS	0.463	0.363	0.668	1.023
NC	0.485	0.953	0.753	0.998
SC	1.000	1.000	1.018	0.997
TN	0.828	0.973	0.775	0.982
VA	0.605	1.000	0.872	1.000
wv	0.826	1.071	1.067	1.000
CENSARA	0.494	1.000	0.706	1.000
LADCO	0.636	1.000	0.764	1.000
MANE-VU	0.467	0.810	0.794	1.000

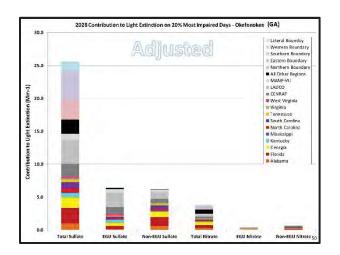


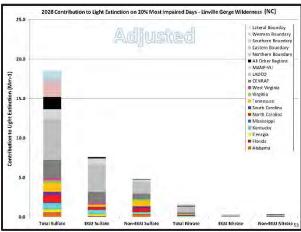


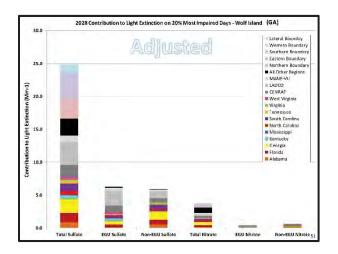


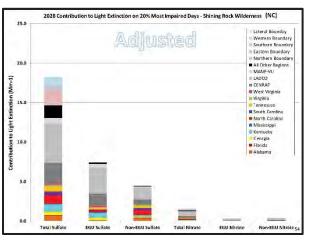


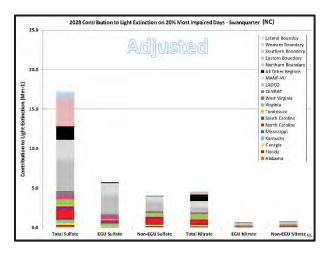


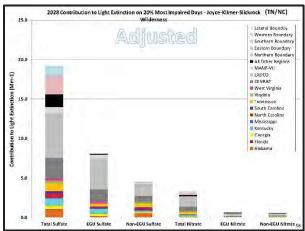


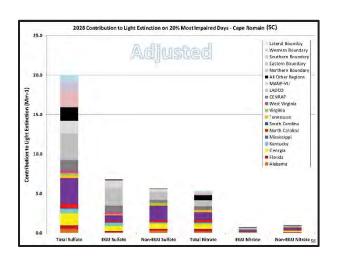


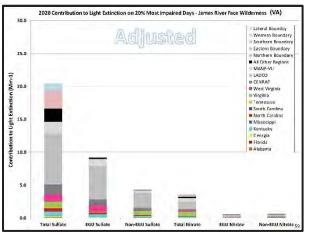


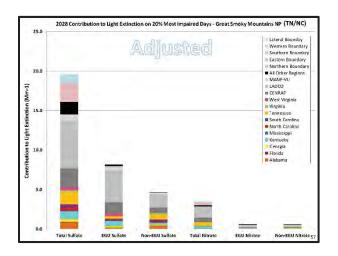


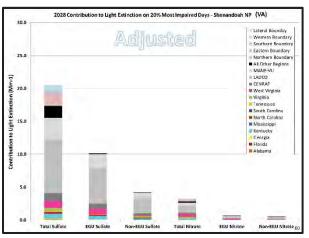


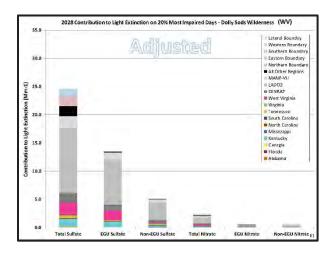


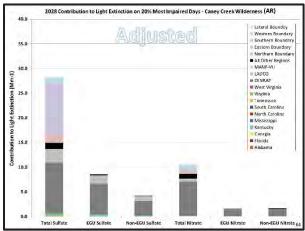


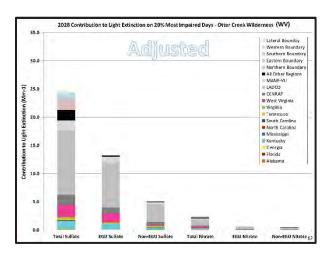


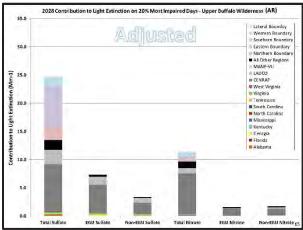


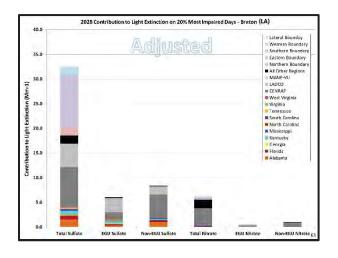


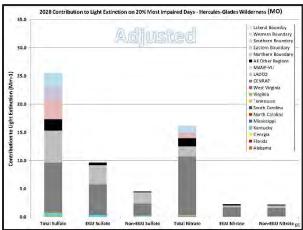


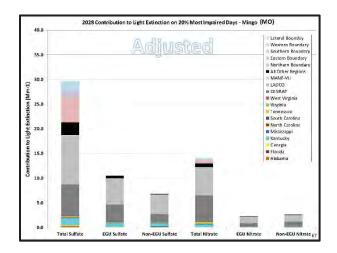






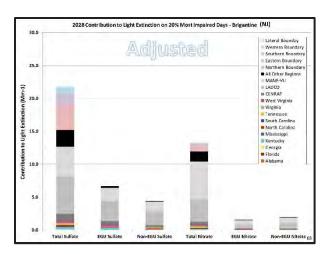






# Reasonable Progress Screening Approach

- The VISTAS reasonable progress work started with AOI screening (Q/d \* EWRT) to rank facilities based on their sulfate and nitrate contributions at each Class I area.
- These rankings were used to identify 87 individual facilities for PSAT tagging. PSAT tagging was used to determine the sulfate and nitrate contributions from each facility at each Class I area in the VISTAS 12 domain.
- 3. Each individual VISTAS state will apply a PSAT contribution threshold based on the facility sulfate and facility nitrate impacts (separately, not combined) divided by the total impact of sulfate + nitrate from all point sources to determine which sources may need to be considered for a four-factor analysis.
  - If sulfate contribution ≥ 1.00% → SO, Four-Factor Analysis
  - If nitrate contribution ≥ 1.00% → NOx Four-Factor Analysis



# Why 1% Threshold?

- In the Round 1 Regional Haze SIPs, many VISTAS states used the AOI approach and a 1% threshold on a Unit basis.
  - Round 2 uses the AOI/PSAT approach and a ≥ 1.00% PSAT threshold based on a <u>Facility</u> basis.
    - This will pull in more facilities compared to a Unit basis.
  - Round 2 uses 2028 emissions (lower than 2018)
     This will pull in facilities with smaller visibility impacts (in Mm<sup>-1</sup>) compared to Round 1.
- This approach results in a reasonable number of sources that can be evaluated with limited state resources and focuses on the sources with the largest impacts.

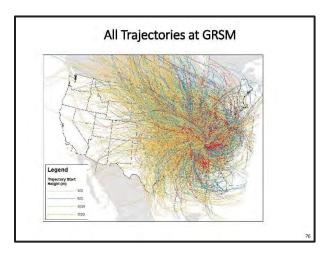
Reasonable Progress Screening Analysis

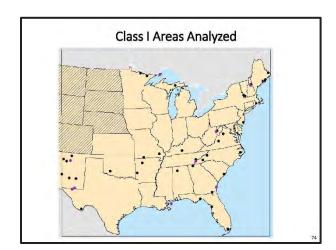
# Area of Influence (AOI) Analysis

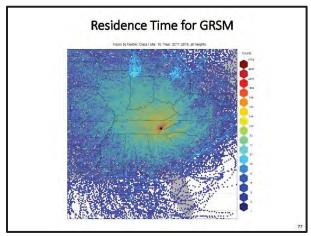
- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: (Q/d)\*EWRT
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the four-factor analysis

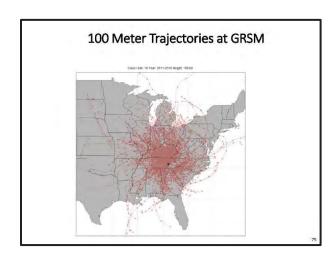
# **HYSPLIT Trajectories**

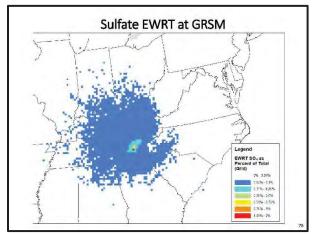
- Trajectories were run using NAM-12 meteorology for the 20% most impaired days in 2011-2016 at 44 Class I areas.
  - Trajectories were run with starting heights of 100, 500, 1,000, and 1,500 meters.
  - Trajectories were run 72 hours backwards in time for each height at each location.
  - Trajectories were run with start times of 12AM (midnight of the start of the day), 6AM, 12PM, 6PM, and 12AM (midnight at the end of the day) local time.
- 44 Class I areas x 6 years x 24 days/year x 4 heights x 5 start times = 126,720 trajectories

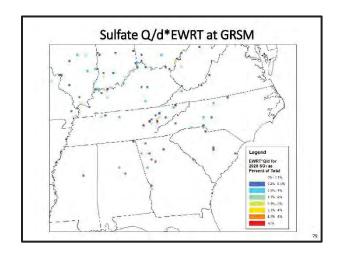












State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	502_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Brunswick Cellulose inc	27.9	1,554.5	294.2	2.94%	8.84%
FL	ROCK TENN CP, LLC	74.9	2,316.8	2,606.7	0.39%	8.58%
GA	International Paper - Savannah	85.9	1,560.7	3,945.4	0.24%	7.53%
FL	(FA	105.1	851.8	2,094.5	0.09%	0.43%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	109.9	351.5	1,860.2	0.03%	2,65%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS INC	173.6	112.4	2,745.0	0.01%	1.97%
SC	ALLIMAX OF SOUTH CAROLINA	223.0	108.1	3,751.7	0.00%	1.84%
FL	RAYONIER PERFORMANCE FIBERS I.C.	77.4	2,327.1	362.0	0.38%	1.79%
FL	SEVENOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	0.02%	1.77%
OH	General James M. Gavin Power Plant (0627010056)	845.3	8,122.5	41,595.8	0.02%	1.71%
SC	SAVIEC COOPER CROSS GENERATING STATION	251.0	3,273.5	4,281.2	0.09%	1.59%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	597.1	0.00%	1.55%
FL	FT CFEWICAL HOLDINGS, INC.	118.5	37.7	898.9	0.00%	1.22%
FL	DUKE ENERGY PLORIDA, INC. (DEF)	296.6	2,489.8	5,306.4	0.04%	1.19%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.03%	1.08%
GA	Savannah Sugar Refinery	89.9	521.6	582.0	0.08%	1.06%
SE	INTERNATIONAL PAPER EASTOVER	288.7	1,780.3	3,212.9	0.05%	0.95%
GA	Ga Power Company - Plant McManus	27.1	72.2	30.1	0.14%	0.93%
SC	KAPSTONE CHARLESTON (RAFT LLC	213.E	2,355.8	1,863.7	0.09%	0.89%
PA	GENON NE VIGME CO/KEYSTONESTA	1,045.6	6,578.5	56,939.2	0.01%	0.84%

# | State | SACELLY NAME | DISTANCE | (sen.) year) | (son.) year) |

# Georgia Tagging for PSAT • Sources in Georgia (≥ 2% threshold) • Ga Power Company - Plant Bowen • International Paper - Rome (aka TEMPLE INLAND) • International Paper - Savannah • Brunswick Cellulose Inc • Georgia-Pacific Consumer Products LP (Savannah River Mill) • Sources outside Georgia (≥ 4% threshold) • INDIANA MICHIGAN POWER DBA AEP ROCKPORT (IN) • ROCK TENN CP, LLC (FL) • JEA (FL)

State	FACILITY NAME	DISTANCE (km)	NOx_2028 (tons/year)	SOZ_2028 (tons/year)	NDx Contribution	SO2 Contribution
.FL	WHITE SPRINGS AGRICUCTURAL CHEMICALS INC	71.5	.112.4	2,745.0	0.03%	14.63%
FL	ROCK TENN CP, LLC	64.8	2,316.8	2,606.7	0.88%	12,82%
FL	JEA .	65.6	851.8	2,094.5	Ct. 18%	6.60%
FL	STYLINGIE E ECTRIC COGPERATIVE, PAG.	121.4	917.8	3,713.4	0.07%	3.25%
R.	IT EFENTEAL HOLDINGS, INC.	56.8	37.7	898.9	0.01%	3.25%
FL	RAYONIER PERFORMANCE FIBERS LLC	63.4	2,327.1	562.0	0.90%	2.82%
GA	International Paper - Savannah	178.9	1,560.7	3,945.4	0.08%	2.81%
FL	BUCKEYE FLORIDA, I MITTO PARTNERS IP	153.5	1,830.7	1,520.4	0.1/1%	2.18%
FL	RENESSENZ LLC	59.8	56.3	569.5	0.02%	1,96%
TI	DUKE ENERGY FLORIDA, INC. (DEF)	205.0	2,489.8	5,306.4	0.06%	1.40%
AL	Sanders, cod Co	384.E	121.7	7,951.1	0.00%	1.11%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	197.2	351,5	1,860.2	0.01%	1.05%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.05%	1.02%
GA	Brunswick Cellulose Int	75.3	1,554,5	294.2	0.34%	1.01%
SC	ALUMAX OF SOUTH CARGUNA	322.7	108.1	3,751,7	G.00%	0.97%
GA	PCA Valdosta Mill	112.7	1,032.6	485.7	0.09%	0.85%
St	SANTEE COOPER CROSS GENERATING STATION	348.1	3,273.5	4,281.2	0.05%	0.85%
FL	CITY OF GAINESVILLE, GRU	111.7	410.0	881.4	0.03%	0.79%
SC	KAPSTONE CHARLESTON KRAFT LLC	314.9	2,355.8	1,863.7	0.06%	0.65%
GA	Ga Power Company - Plant Wansley	403.7	2,052,5	4,856.0	0.02%	0.65%

State	Threshold	Notes
AL	2%	Sulfate only
FL	5%	Sulfate or nitrate, plus Gulf Crist, Mosaic Bartow, Mosaic New Wales, and Mosaic Riverview
GA	2% - 4%	Sulfate or nitrate, 2% threshold for GA facilities, 4% threshold for facilities outside GA
KY	2%	Sulfate or nitrate
MS	2%	Sulfate or nitrate
NC	3%	Sulfate + nitrate
sc	2% - 5%	2% for sulfate, 5% for nitrate, plus Santee Cooper Winyah, International Paper Georgetown, and SCE&G Williams
TN	3%	Sulfate + nitrate, plus CEMEX
VA	2%	Sulfate + nitrate
wv	0.2%	Sulfate or nitrate

### **PSAT Source Apportionment Modeling**

- · Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- Used for further evaluation of AOI results
- · Refines information on contributions to visibility impairment
- · Can be used to adjust future year visibility projections to account for additional emission
- . VISTAS contract with ERG allows for up to 250 tags

1,151.9
197,8
3,114.5
7,002.1
1,534.1
3,829.7
2,992.3
1,795.4
7,511.3
195.5
21.5
108.0
2,031.2
2,355.8
3,273.4
1,772.9
992.7
711.5
6,900.3
883.2
964.1
1,916.5
1,687.3
520.1
1,985.5
1 977.9
7 1 3 2 1 2 2 3 1

### PSAT SO<sub>2</sub> and NOx Tags (209)

- \*\*Normal (122 tags)

  \*\*Total SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags

  \*\*Total NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags

  \*\*EGU point SO<sub>2</sub> tags for 10 individual VISTAS states + 3 RPOs = 13 tags

  \*\*EGU point NOx tags for 10 individual VISTAS states + 3 RPOs = 13 tags

  \*\*SO<sub>2</sub> tags for individual VISTAS facilities = 50 tags

- NOx tags for individual VISTAS facilities = 20 tags

### Round 2 (87 tags)

- Non-EGU point  $SO_2$  for 10 individual VISTAS states + 3 RPOs = 13 tags

  Non-EGU point NOx for 10 individual VISTAS states + 3 RPOs = 13 tags

  SO\_2 and NOx for N/S/W/E boundaries = 8 tags

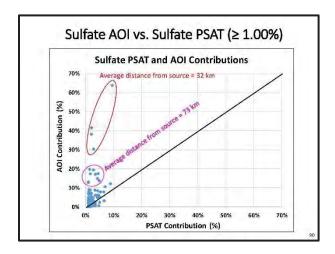
  SO\_2 tags for individual VISTAS facilities = 10 tags

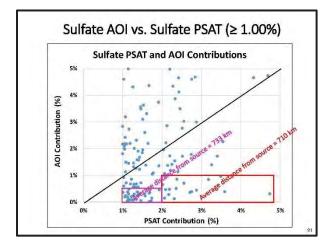
  NOx tags for individual VISTAS facilities = 16 tags

- SO<sub>2</sub> tags for individual non-VISTAS facilities = 17 tags
- NOx tags for individual non-VISTAS facilities = 10 tags
- → 87 Total Facility Tags (both SO<sub>2</sub> and NOx)

cility Stat	e Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 FTRYT	NOs (TPY)
WV	VISTAS		ALTEGRENY ENE IGY SUPPLY CO. LUCHAR RISON	10,082,54	11,830.8
WV	VISTAS	54049-4864511	AMERICAN BITUY INOUS POWER-GRANT TOWN PLT	2,210,25	1 245.1
WY	VISTAS	54079.5789111	APPALAC HAN POWER COMPANY JO IN FAMOS PLANT	10,984.74	4,878.1
WV.	VISTAS	54025-5252011	Dominion Resources Inc.   MCUNT STORM POWER STATION	2,127.54	1,984.1
WV	VISTAS	54041 5900311	EQUITRANS CORFY RUN CS 70	0.10	511.0
WY	VISTAS	54853-5790711	FILES CREEK GC/13/40	0.15	643.3
WV	VISTAS	54033-5790511	6LA0Y 6C4350	0.11	343.7
WV.	VISTAS	54093-5327811	KINGSFORD IV ANUFACTURING COMPANY	16.95	140.8
WV	VISTAS	54061-16320111	LONGVIEW POWER	2,513:73	1,556.5
WV	VISTAS	54051-6902311	MITCHELLPLANT	5,372.40	2.719.6
WV	VISTAS	54061-6773611	MONONGAHELA ?OWERCO FORT IV. ARTIN POWER:	1,881.87	13,743.3
900	VISUAS	54073-4/82811	MONCINGAHELA POWER CO-PLEASANTS POWERSTA	16,817,46	5,4973
WV	VISTAS	54051-57/3811	MORGANIOWN : NERGY ASSOCIATES	828.64	655.5
3.5	CENRAP	05853-1085411	ENTERGY ARKANSAS INC-INDEPENDENCE PERMI	32,050.48	34,133.1
ViO	CENRA?	79143 5363811	NEW MADEIT POWER PLANT MARSTON	16,783.71	4,394.1
MO	LIV 3V AV	24601 7763811	Juke Paper Company	22,559.84	3,607.0
PA	VIANE-VU	42005-3865111	GENON NE MONT CO/KEYSTONE STA	56,939.25	6,575./
PA	YANE-VU	42063-3005211	HOMER CITY GEN LP/ CENTER TW?	11,865.70	5,215.5
PA	VANE-VU	42053-3085111	NRG WHOLESALE GEN/SEWARD GEN STA	3,880,23	2,254.8
II.	Midwest RPQ	17127-7808911	Joppa Steam	20.509.28	4,705.3
IN	Midwest RPQ	18173-8183111	Alicua Warnick Power Plt Age Div of AL	5,071.28	11,158.5
IN	Midwest RPO	18051-7363111	Gibson	23,117,23	12,280.3
191	MidwestRPO	18147-8017211	INDIANA MICHIGAN POWELDBA AFP BOCKPOIL	30,536.35	H,HCS.
IN.	MidWest RPO	18175-7367411	INDIANAVOUS POWER & UGHT PELERSBURG	18,141,88	10,665
18	Millwest RPO		Sigeco AB Brown South Indiana Gas & Ele	V,544.70	1,5/8.5
đi	Minwest BPO	39081 8115711	Cantinal Power Plant (Gertlinal Operating Company) (054 (050002)	7,460.79	2,462.3
30	MidwestRPO	19811-8010811	Conceyilla Power Plant (0615000000)	6,156.23	9,457.8
911	Minwest RPO	39075 8294311	Duk: Trungy Ohio, Wm. H. Zimmer Station (1413090154)	72,133,90	7,149.9
3H		39053-3143511	General James IV., Gavin Power Plant (9627010056)	41,593,81	8,122.5
- QH	Midwest RPO	39053/7983011	Ohio Valley Electric Corp., Kyger Eroek Station (0627000003)	3,400.14	9,149.8

	Le works			To the second of	E de Tarres
Facility State	VISTAS	01097-949811	FACILITY NAME STD Akto Nobel Chemicals inc	SO2 [TPY]	NOw (TPY)
- AL	VISTAS	01097-349811	Ala Power - Barry	6.033 L/	2 275
AL.	VISTAS	01057-1058111	American Malistream Chalem, U.C.	3 106 18	475.3
A)	VISTAS	01073 1018711	DRUMMOND COVPANY, No.	2,562,17	1.228.1
A.	VISTAS	01053 7440711	Frambit Spring Company L.C.	18,974,19	349.3
AL.	UNTAS	01053-985111	Escambia Operating Company L.C.	R 589 50	1393
AL.	VISTAS	01053-985111	Nurar Steel Denatur J.C.	6,589,0A	331.3
	VISTAS	01103-1000011		7.951.05	121
AL			Senders Lead Co	2.573.15	
AL.	VISTAS	01097-1061511	Union Oil of California - Chunchula Gas Plant		349.
- 11	VISTAS	12123-752411	BUCKEYE FLORIDA, L'MITED PARTNERSHIP	1,520.42	1,830,
Fk.	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS FL. LLC.	29.51	910.
11	VISTAS	12017-640611	DUKE ENERGY LICRIDA, WC (DEI)	5,306,41	2,4893
II.	VISIAS	12085-900011	FLORDA POWER & JGHT (PTT)	13:05	170,
Ti	VISTAS	12033-752711	GULF POWER - Crost	2,515.65	2,098
F)	VISTAS	12886 3532711	HOMESTEAD CITY LITTLES	0.00	910
F	VISTAS	12031 640211	JEA:	2,094.48	651.
- EL	VISTAS	12105-712711	MOSAIC FERTILIZER LIC	7,900.67	310.
TEL:	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	3,034.05	159.
FL	VISTAS	12305-919811	MOSAIC FERTILIZER, LLC	4,425.50	141)
- 1,	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LC.	561.97	2,327.
161	VISTAS	12089-753711	ROCKTENN CP, LLC	2,606.72	2,315.
F.	VISTAS	12005-535411	ROCKTENN CPILLE	2,590,88	1,4043
- 11	VISTAS	12129-2731711	TALLAHASSE: ETTY PURCHOM GENERATING STAL	2.85	121.
Li.	VISTAS	12057-548611	LAMPA ELECTRIC CEMPARY (LEC)	5,084.90	2,565.
165	VISUAS	12085-899911	LA HAVAC AMERICA LIK	9.38	8/2
FL	VISTAS	12047 769711	WEITE SPRINGS AGREEM TURAL SHEMICALS, INC.	3,197.77	112.
GA	VISTAS	13127 7721011	Oromywick Cellulese Inc	294.70	1,554.
GA	VISTAS	(2015 281301)	Gi Power Company Hard Towen	10,453.41	6,643
5A	VISTAS	13103-536311	Seorgia-Pacific Consumer Products LP   Savannah River Villi	1.860.13	351
GA	VISTAS	13051-3579811	International Paper Savannah	3,945.38	1,560.
6A	VISTAS	13115-539311	TEVELE NLAND	1,791.00	1.273.3





### **PSAT Reasonable Progress Screening**

- · Due to the amount of resources already invested in the AOI and PSAT analysis, VISTAS does not plan to redo the original AOI or PSAT analyses.
- In cases where emissions decreased or increased at individual facilities being considered for a fourfactor analysis, the facility contributions will be adjusted to be consistent with the lower/higher facility emissions before comparing to the PSAT contribution threshold.
- EPA verbally stated this should be okay 2/6/2020.

AOI vs. PSAT Summary

- AOI tends to overestimate impacts for facilities near the Class I area.
- AOI tends to underestimate impacts for facilities far away from the Class I area.
  - · AOI uses 72-hour back trajectories, sulfate can last for weeks and travel hundreds to thousands of km.
- PSAT is the most reliable modeling tool for tracking facility contributions to visibility impairment at Class I areas.

**Original Facility PSAT Contributions** 

Original Facility Sulfate PSAT Contributions (%)

Facility Sulfate PSAT Contributions (Mm-1)

Total Sulfate + Nitrate Point Contribution (Mm-1)

Original Facility Nitrate PSAT Contributions (%)

Facility Nitrate PSAT Contributions (Mm-1)

Total Sulfate + Nitrate Point Contribution (Mm-1)

**PSAT Reasonable Progress Screening** 

- · The facility sulfate and nitrate contributions (Mm-1) from the individual 87 tagged facilities should not change unless a facility has reduced or increased SO<sub>2</sub> and/or NOx emissions.
- The updated 2028 CAMx modeling will impact the total sulfate and total nitrate contribution from point sources at each Class I area since the SO<sub>2</sub> and NOx emissions have decreased.
  - The facility percent contribution will increase even if the facility emissions do not change since the denominator will decrease

Facility Sulfate Contribution (%) =

Facility Sulfate Impact (Mm-1)

Total Impact of All Point Sources of Sulfate + Nitrate (Mm-1)

Revised Facility Sulfate PSAT Results

 Revised Facility Sulfate PSAT Results = Original Facility Sulfate PSAT Results \* SO, Ratio\_Facility \* Ratio\_Class\_I\_Area

(Revised facility SO2 emissions)

where, SO2 Ratio\_Facility =

(Original facility SO<sub>2</sub> emissions)

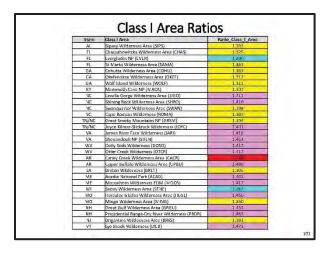
(Original sulfate + nitrate point contribution)

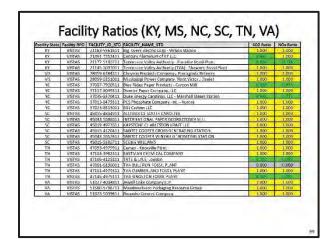
where, Ratio\_Class\_I\_Area = (Revised sulfate + nitrate point contribution)

# Revised Facility Nitrate PSAT Results \* Revised Facility Nitrate PSAT Results = Original Facility Nitrate PSAT Results \* NOx Ratio\_Facility \* Ratio\_Class\_I\_Area (Revised facility NOx emissions) where, NOx Ratio\_Facility = (Original facility NOx emissions) (Original facility NOx emissions) where, Ratio\_Class\_I\_Area = (Revised sulfate + nitrate point contribution) (Revised sulfate + nitrate point contribution)

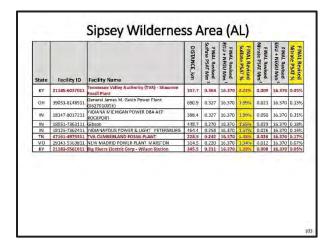
lity State Fac	ility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 Ratio	NOx Ratio
WV.	VISTAS -	54033-52/1/11	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON		Coll4
WV 1	VISTAS	54049-4864511	AMERICAN BITUMINOUS POWER-GIANT TOWN PLT		
WW 1	VISTAS	54079 5789111	APPALACHIAN POWER COMPANY HO IN E AMOS PLANT	- 645	
WV. I	VISTAS	54023 5257011	Dominion Resources, Inc. MIGUNESTORM POWER STATION	0.035	0.20
WV 1	VISTAS .	54041 5900311	EQUITRANS COPIES RUN CS 70	1,800	1.000
WV 1	/ISTAS	54033-5790711	FILES CREEK GC/1340	1.000	1.000
WV Y	VISTAS	54053-5790511	GLADY 6C4350	1.000	1,000
WV 3	VISTAS	54093-5327811	KINGSFORD IV ANUFACTURING CONPANY	1.000	1.000
WV V	VISTAS	54061-16320111	LONGVIEW POWER		
WV 1	VISTAS	54051-6902311	MITCHELL PLANT	0.75	
WV 1	VISTAS	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER:	0.805	
WV I	VISTAS	540/3-4/82811	MONONGAHELA POWE CO-PLEASANTS POWERSTA	0.584	
WV V	VISTAS	54051-57/3811	MORGANIOWN ENERGY ASSOCIATES	T. DOT	
AR C	ENRAP	05053-1083411	EN FERGY ARRANSAS INC-INDEPENDENCE PLANT	0.000	
MO 0	CNRA2	29143 5363811	NEW MADRID POWER PLANT MARSTON	73.00	
MD V	ANE VII	24001 7763811	Luke Paper Company	T-40	1.000
PA VI	ANE-VU	42005-3866111	IGENON NE MIGMT CO/KEYSTONE STA	0.83	
PA V	ANE-VU	42053-3005211	HOMER CITY GEN LP/ CENTER TWO	Dime	
PA V	ANE-VU	42053-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	8.55	
IL Mid	west RPQ	17127-7808911	Joppa Steam	1.4	0.425
IN Mid	west RFO	18173-8183111	Alcea Warnick Power Plt Age Div of AL	6.436	
	west RPO	18051-7363111	Gibson	16	
IN Mid	west RPO	18147-8017211	INDIANA MICHGAN POWER DBA AEP ROCKPORT	6.00	0.006
IN Mid	westRPO	18125-7562411	INDIANAPOLIS POWER& UGHT PETERSBURG	155.3	
IN Mid	hwest RPO	18129-8165111	Sigeco AB Brown South Indiana Gas & Ele	0.000	0.000
Oil Mid	west RPO	39081 8115711	Cardinal Power Plant (Cardinal Operating Company) (0541050002)		
(III Mid	hvest RPO	39831-8010811	Concsville Power Plant (0615000000)	0.000	0.000
OII Mid	west RPO	39075 8794311	Duke Energy Obio, Wm. 1. Zimmer Station (1413090154)	1501	
OH Mid	west RPO	39053-3143511	General James V., Gavin Power Plant (0627010056)	Little	1881
OH Mid	west RPO	39053-7989011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)		

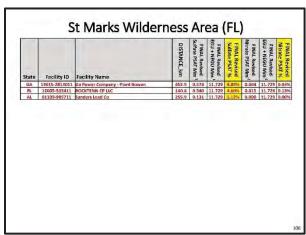
		racı	lity Ratios (AL, FL, GA	()	
Facility State	Facility RPO		FACILITY NAME STD	SO2 Ratio	NOx Ratio
AL.	VISTAS	01097-949811	Akzo Nobel Chemicals inc	1.000	1.000
W.L.	VISTAS	01097-1058111	Ala Power - Barry	0.00	1.000
Al	VISTAS	01129 1028711	American Midstream Children, ITC	0.000	0.000
Al .	VISTAS	01073 1018711	DRUMMOND COVIPANY, NC.	1.000	1,000
A	VISTAS	01053 7440211	Estambia Operating Company L.C.	(1.0)	1.000
AL	VISTAS.	01053-985111	Escambia Operating Company L.C	0.010	0.000
AL	VISTAS	01103-1000011	Nucor Steel Decatur .LC	1.000	1.000
AL	VISTAS	01109-985711	Sanders Lead Co	1.000	1.000
AL	VISTAS	01097-1061511	Union Cil of California - Chunchulz Gas Plant	0.000	0.000
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, L'MITED PARTNERSHIP	1.000	1.000
FL	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS PL. LLC.	1.000	
11	VISIAS	12017-640611	DU CEENERGY LLCRIDA: NC. (DEL)	7.48	100-1
- 61	VISIAS	12085-900011	FLORIDA POWER & LIGHT (PT) 1	1.000	1.000
- 14	VISTAS	12035-752/11	GULI POWER-Crist	0.00	0.704
FI	VISTAS	12086 3532711	HOMESTEAD CITY LITE IT ES	1.000	1,000
F	VISTAS	12031 640211	IFA		
(F)	VISTAS	12105-717711	MOSAIC FERTILIZER LLC	Cont	1,000
FL	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	0.000	
FL	VISTAS	12105-919811	MOSAIC FERTLIZER L.C.	0.07	1.000
FL	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	1.000	1.000
FL	VISTAS	12089-753711	ROCKTENN CP. L.C.	1.000	1.000
FL	VISTAS	12005-535411	ROCKTENN CP LLC	1.000	1.000
41	VISTAS	12139-2731711	TALLAHASSE: CITY PURDOM GENERATING STA.	1,000	1.000
51	VISTAS	12057-538611	DAMPA ELECTRIC COMPANY (1:C)	T.000	1.000
91	VISTAS	12085-899911	LARMAC AMERICA LLC	1.800	
FL	VISTAS	12047 709711	WILITE SPRINGS AGRICULTURAL CHEMICALS, INC.	UATE	17, 97/9
GA	VISTAS	13127 3721011	Brunswick Collubrating	1.000	1,008
GA	VISTAS	13015 2813011	Ga Power Company Plant Bowen	1.000	1.000
GA.	VISTAS	13103-536311	Georgia-Pacific Consumer Products LP (Savannah River Vill)	1.000	1.000
GA.	VISTAS	13051-3679811	International Paper - Savannah	1.000	1.000
6A	VISTAS	13115-539311	TEVPLE NIAND	1.000	1.000

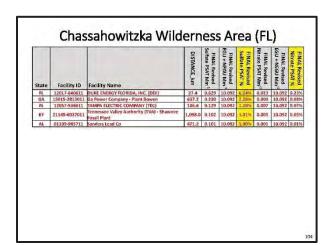


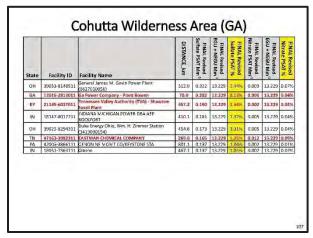


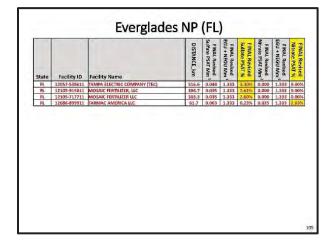
# • Revised Facility Sulfate PSAT Results = Original Facility Sulfate PSAT Results \* SO<sub>2</sub> Ratio\_Facility \* Ratio\_Class\_I\_Area • Original Facility Sulfate PSAT Results = 1.46% • Revised Facility Sulfate PSAT Results = 1.46% • Revised Facility Sulfate PSAT Results = 1.46% \* 0.665 (Slide 100) \* 1.382 (Slide 101) = 1.34% (Slide 103) For detailed calculations, see Handout - Roadmap located at: https://www.metro4-sesarm.org/content/vistas-regional-haze-program 102

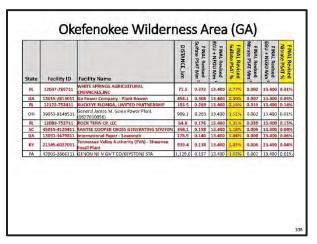


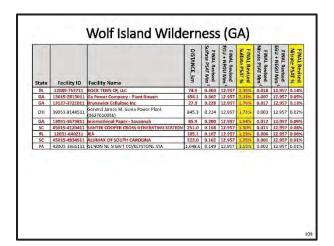


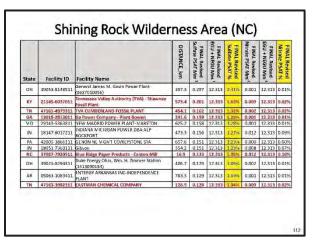


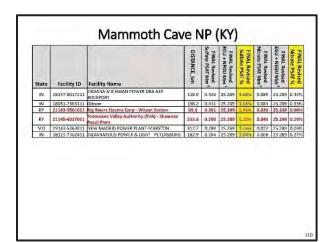


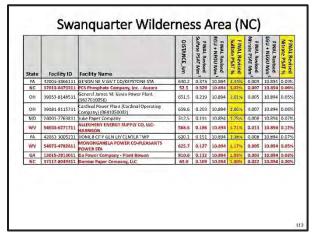


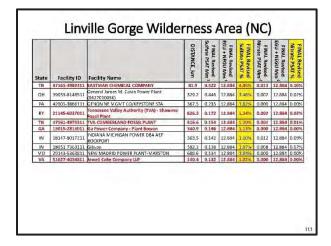


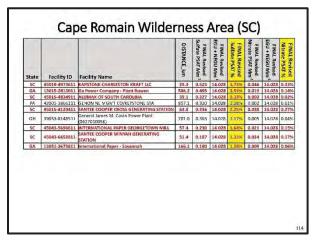




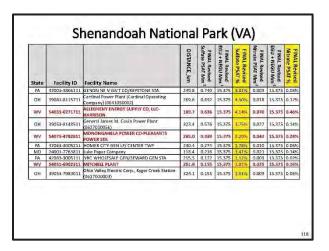


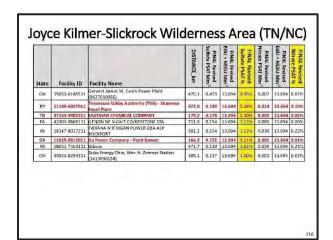


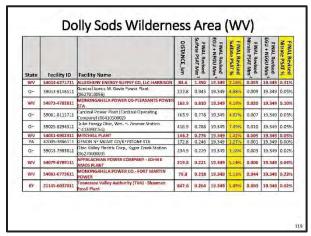


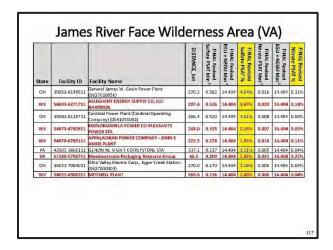


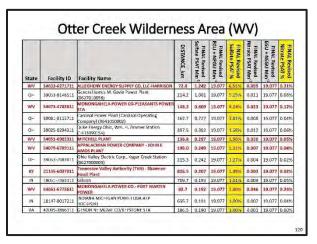
EV   2148-693061,	State	Facility ID	Facility Name	DISTANCE_km	FINAL Revised sulfate PSAT Mm	FINAL Revised GU + NEGU Mm <sup>3</sup>	FINAL Revised Sulfate PSAT %	FINAL Revised litrate PSAT Mm <sup>-1</sup>	FINAL Revised GU + NEGU Mm <sup>-1</sup>	Nitrate PSAT%
No.   1814-693701	ОН	39053-8148511		400.5	0.520	13,916	3.73%	0.003	13.916	0.025
PA 42005-3866111 GENON NE VGNT CO/KEYSTONE STA 688.2 0.166 13.916 13.95 0.001 13.91 IN 18147-801/2111 ROCKPORT 375.5 0.166 13.916 21.195 0.035 13.91	ку	21145-6037011		465.3	0.183	13.916	1.32%	0.011	13.916	0.089
IN 18147-8017211 INDIANA WICHIGAN POWER DBA ALP 375.5 0.166 13.916 1.19% 0.035 13.91	TN	47163-3982311	EASTMAN CHEMICAL COMPANY	160.1	0.170	13,916	1.22%	0.007	13.916	0.05
IN 18147-8017/211 ROCKPORT 375.5 0.166 13.916 3.19% 0.035 13.91	PA.	42005-3866111	GENON NE WGWT CO/KEYSTONE STA	688.2	0.166	13.916	1.19%	0.001	13.916	0.015
IN 18951-7363111 Gibson 456.3 0.146 13.916 1.05% 0.037 13.91	IN	18147-8017211		375.5	0.166	13,916	1.19%	0.035	13.916	0.25
	IN	18051-7363111	Gibson	456.3	0.146	13.916	1.05%	0.037	13.916	0.275











### Non-VISTAS Class I Areas

- Only two VISTAS facilities have a contribution
   ≥ 1.00% at any non-VISTAS Class I Area
- ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON (WV)
  - · Moosehorn Wilderness EDM (1.06% sulfate)
- Tennessee Valley Authority (TVA) Shawnee Fossil Plant (KY)
  - · Caney Creek Wilderness Area (1.09% sulfate)
  - Hercules-Glades Wilderness Area (1.95% sulfate)
  - · Mingo Wilderness Area (1.47% sulfate)
  - · Great Gulf Wilderness Area (1.03% sulfate)
  - Presidential Range-Dry River Wilderness (1.03% sulfate)

### EPA Guidance (August 20, 2019)

- Many facilities already have effective emission control technologies in place. States will consider control options for these facilities on a case-by-case basis.
  - "For the purpose of SO, control measures, an EGU that has add-on flue gas desulfurization (FGD) and that meets the applicable alternative SO<sub>2</sub> emission limit of the 2012 Mercury Air Toxics Standards (MATS) rule for power plants. The two limits in the rule (IO.2 Ib/MMBtu for coalfired EGUs or O.3 Ib/MMBtu for EGUs fired with oil-derived solid fuel) are low enough that it is unlikely that an analysis of control measures for a source already equipped with a scrubber and meeting one of these limits would conclude that even more stringent control of SO<sub>2</sub> is necessary to make reasonable progress."
  - necessary to make reasonable progress."

    "For the purposes of SO, and NOx control measures, a combustion source (e.g., an EGU or industrial boiler or process heater) that, during the first implementation period, installed a FGD system that operates year-round with an effectiveness of at least 90 percent or by the installation of a selective catalytic reduction system that operates year-round with an overall effectiveness of at least 90 percent (in both cases calculating the effectiveness as the total for the system, including any bypassed flue gas), on a pollutant-specific basis."

124

State	FACILITY ID STU	FACILITY NAME STD	IMPACTED CLASS LAREAS
AL	01109-985711	Sanders Leac Co	CHAS, SAMA
TI	17173-752411	BLICKEYE FLORIDA, LIMITED PARTNERSHIP	CAFF
FI	12007-620611	THIKE ENERGY FLORIDA, ING. (DEF)	GHAS -
FL	12031-600211	IEA.	WOLF
FL	12105-/17711-	MOSAIC PERTILIZER LLC	EVER.
FL	12105-919811	MOSAIC FERTILIZER, LLC	EYER
FL	12089-753711	ROCK TENN OP, IJC	CKEE WOLF
F)	17005-535411	ROCKTENN CPLIC	SAMA
Ft.	12057-538611	TAMPA ELECTRIC COMPANY (TEC)	CHAS, EVER
FI	17086-899911	FARMAC AMERICA LLC	ENDR
. HL	12047-769-11	WHITE SPRINGS AGRICULTURAL CHEMICALS INC.	OREK
GA	13327-3721011	Brunswick Cellulose Inc	WOLF
-GA	13019-2313011	Ga Power Company - Plant Bowen	CHAS, COHU, JOYC, LIGO, OKEF, ROMA, SAMA, SHRO, SWAN, WOL
GA	13051 3579811	International Paper Savarnati	OKTE, BONIA, WOLF
KY	21183-9561611	Birt Rivers Electric Corp - Wilson Station	MACA, SIRE
BY	21,145,6387011	encesses Valley Auctority (TVA). Shawnes Fossil Plans	CACR, CHAS, COHL, DOSO, 68GL, GRSM, HEGL, KWC, HGO, MACZ NING, OKEF, UTCS, PROR, 2HRO, SHS
100	37087-7920511	Blue Ridge Paper Products - Canton Mill	SHRO
NC	37117-8049311	Domtal Paper Company, LLC	SWAN
NC	3/013-34/9311	I/CS Phosphate Company, Inc Autora	SWAN
SC.	45015 4834911	ALUMAX OF SOLITIF CAROLINA	ROMA, WOLF
90	15013-5658611	IN TERNATIONAL PAPER GEORGE, OWN MILL	ROMA
30	45019 4573611	KAPSTONE CHARLESTON KRAFT HIC	RONA.
30	45015-4120421	SANTEL LOGPER CRUSS GENERATING STATION	OKEL ROMA, WOLL
SC	45043-5852811	SANTER COOPER WINVAH GENERATING STATION	RGMA
161	4/163-3982311	EASTMAN CHEMICAL COMPANY	COHU, CHSM JOYC, BCO, SHRO
TN	47161-4979311	TVA CUIVIBERLAND FOSSIL PLANT	LIGO, SHRO, SIPS
VA	51027-0034811	Jewell Coke Company LU <sup>2</sup>	HSU
VA.	51580 5798701	Meanwestware Parkaging Resource Group	JARI
WY	54033-6271711	ALLEGHENY ENERGY SUPPLY CO. LLC-HARRISON	DOSO, JARL MOOS, OTCR, SHEN, SWAN
WV	54079 6789111	APPALACHIAN FOWER COMPANY TO HINE AMOS FLANT	GOSO, IARI, DTCR
WV	54051-6902311	MITCHELL PLANT	DOSO, JARI, OTCR, SHEN

WV 54061-6773611 MONONGAHELA POWER CO.-FORT MARTIN POWER
WV 54073-4747811 MONON GAHELA POWER CO.-PLEASANTS POWER STA

19053 7983011 Obje Valley Floratic Corp., Kyger Greek 5th 42005-3865111 GENON NEIMGMT CD/XEVSTONE STA

### Additional Considerations

- The final list of four-factor analysis sources will be determined in consultation with the FLMs, EPA, other states, and stakeholders.
- Some VISTAS states may perform additional fourfactor analyses for sources not listed on Slide 122.
- States will verify projected SO<sub>2</sub> and NOx emissions with facilities. PSAT results can be adjusted to match.
- Some states may allow their facilities to take a permit limit that will result in adjusted PSAT impacts below the 1.00% threshold in lieu of performing a four-factor analysis
- The large number of coal-fired EGU retirements and fuel switching from coal to natural gas need to be considered along with the sources selected for the four-factor analysis. States should not be penalized for early action.

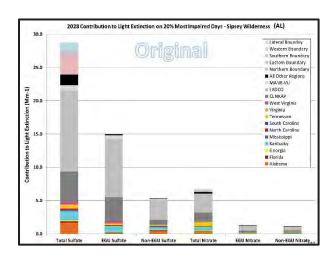
125

	Non-VISTAS Facilities	≥ 1.00%
ILITY_ID_STD	FACILITY_NAME_STD	IMPACTED CLASS I AREAS
053-1085411	-NT-HGY ARKANSAS INCHNDEPENDENCE PLANT	SHIQ
051 7363111	Gibsun	COHU, SRSV., KOYC, USO, MACA, OTCR, SHRD, SIPS
147-8017211	ND ANA MICHIGAN POWER 3BA AEP HOCKPORT	CONF. BION, JOYC, L'GO, WACA, CITCH, SHAC, SIPS
125-7362411	ND ANAPOLIS POWER & LIGHT PETERSBURG	MACA, SIPS
001-7763811	.uke Paper Company	SHEN, SWAN
143-5363311	NEW MADRID POWER PLANT-MARSTON	LIGO, MACA, SHRO, SIPS
081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	DOSO, JARI, OTCR, SHEN, SWAN
025-8294311	Duke Energy Chio, Wm. F. Zimmer Station (1413090154)	EGHU: DOSG, JOYC, OTCR, SHRO
men stagess	Constitution of Constitution and April (accessorated and	COHU, DOSO, GRS VI. JAR , JOYC, LIGO, OXEF

### Next Steps and Schedule

126

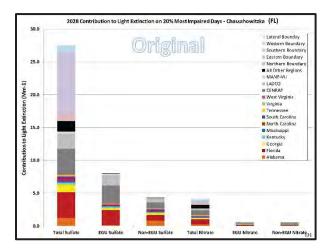
Task	Schedule
2028 Point Emissions Updates	Completed *
2028 Emissions Processing	Completed *
2028 CAMx Modeling	Completed *
2028 Visibility Projections	Completed *
2028 Deposition Projections	Late May/Early June 2020 *
Final Reports and Documentation	Late July 2020
Website Updates and Postings	Late July 2020
End of Contract	September 30, 2020
Regional Haze SIPs Due to EPA	July 31, 2021



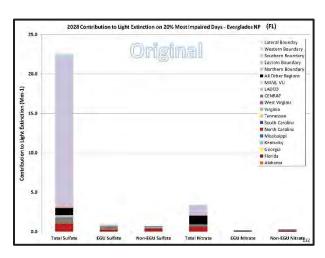
### **Contacts for Further Information**

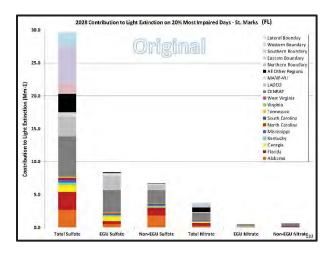
- For general, technical, and SIP-related questions, contact the TAWG and CC Chairs:
  - TAWG Randy Strait (<u>randy.strait@ncdenr.gov</u>)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
- For project and contract management questions, contact the Project Manager:
  - John Hornback (hornback@metro4-sesarm.org)

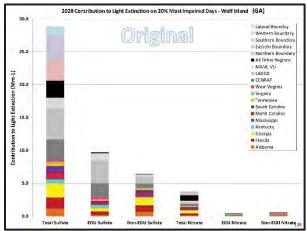


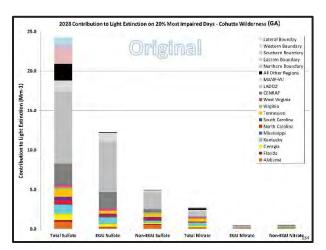


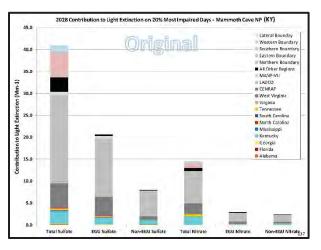
Appendix:
Original Analysis
(Conducted 2018-2019)

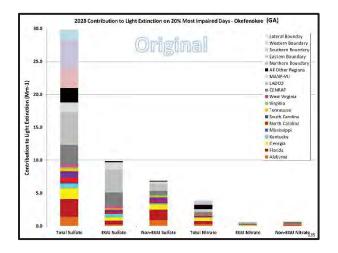


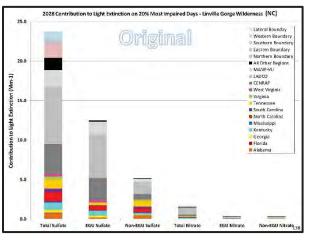


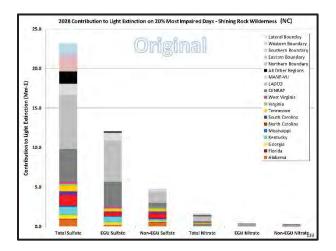


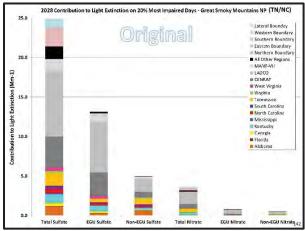


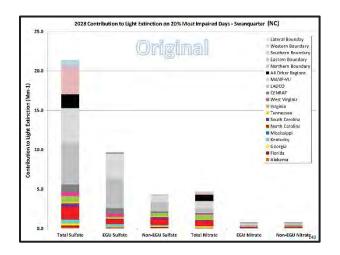


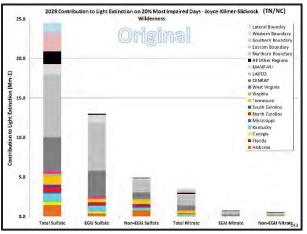


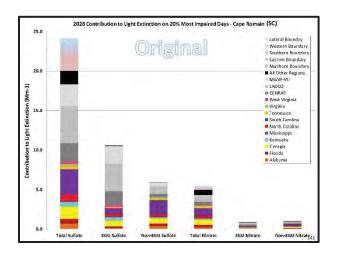


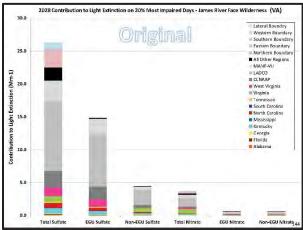


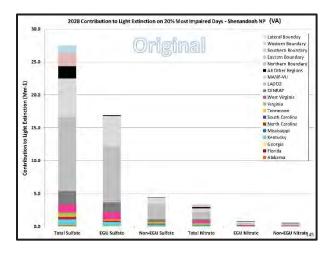


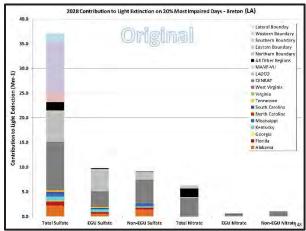


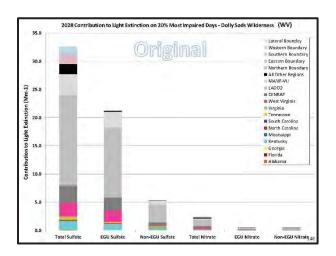


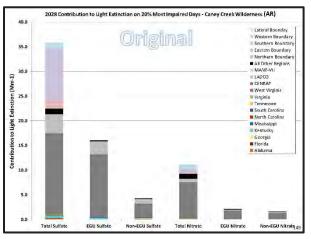


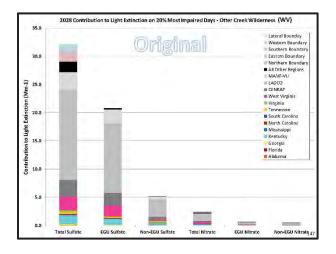


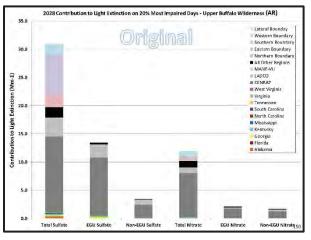


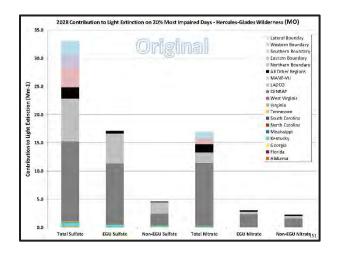


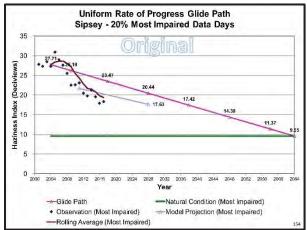


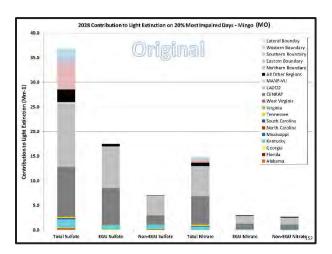


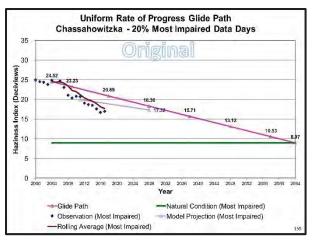


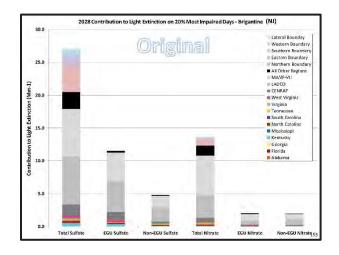


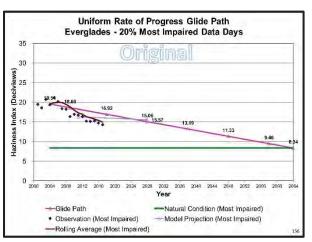


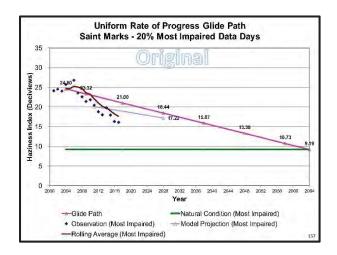


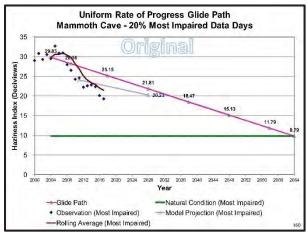


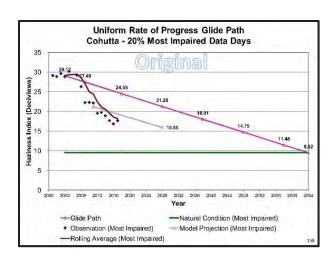


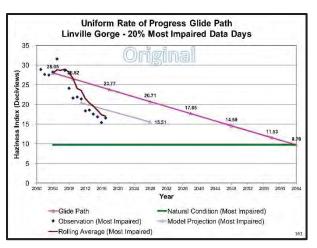


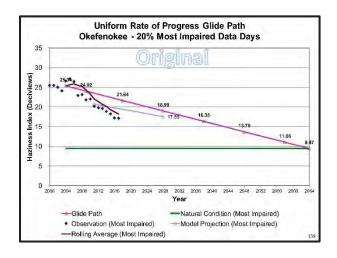


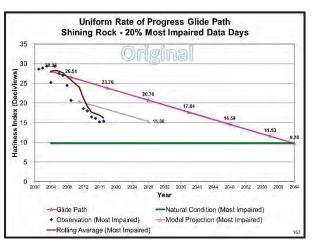


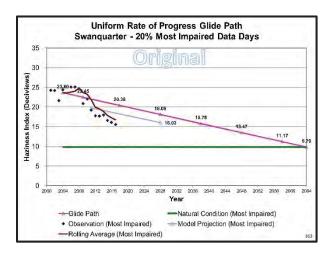


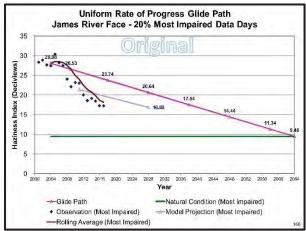


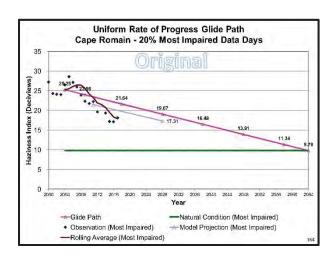


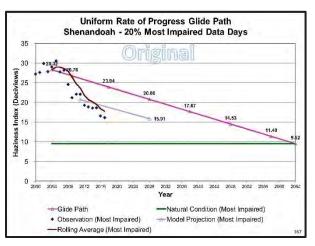


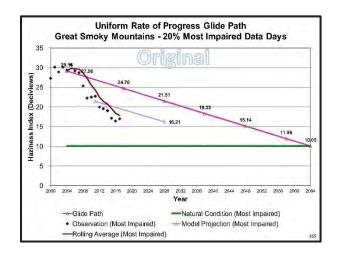


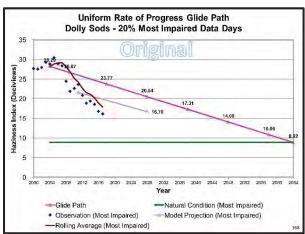


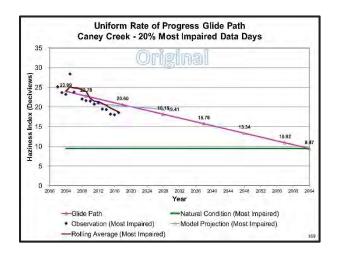


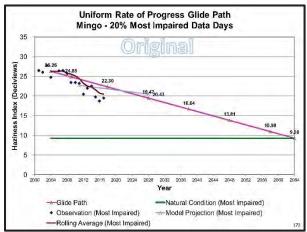


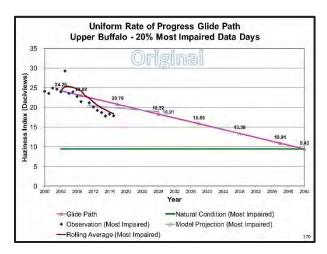


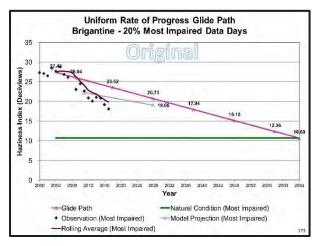


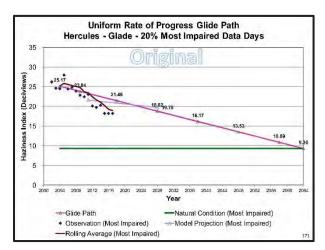




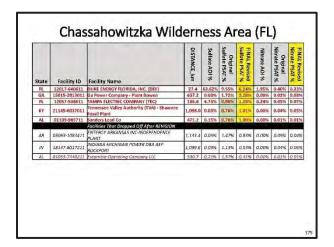


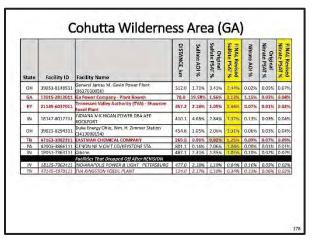


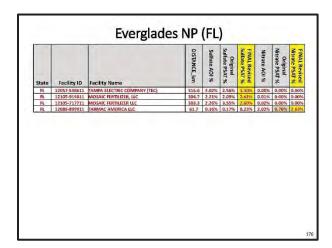


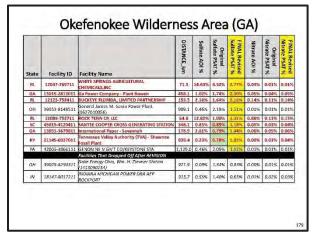


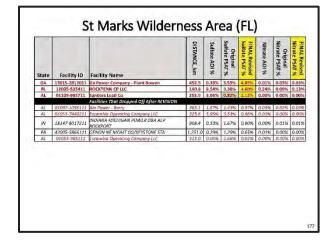
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
KV	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	337.7	3.11%	1.61%	7.22N	0.57%	0.04%	0.05%
ОН	39053-8148511	General James M. Gavin Power Flant (0627010056)	690.9	0.38%	2.75%	1.99%	0.01%	0.09%	0.13%
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	398.4	5.72%	4.09%	1.99%	0.31%	0.23%	0.31%
IN	18051-7363111	Gibson	448.7	2.85%	2.12%	1.65%	0.27%	0.19%	0.18%
IN	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	464.4	1.72%	2.19%	1.57%	0.23%	0.23%	0.16%
TN	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	228.9	3,18%	1.07%	1.48%	0.48%	0.12%	0.17%
VO	29143-5363811	NEW MADRID POWER PLANT WARSTON	314.5	3.45%	1.46%	1.34%	0.26%	0.06%	0.07%
KA	21183-5561611	Big Rivers Electric Corp - Wilson Station	345.5	1,99%	0.93%	1.29%	0.07%	0.04%	0.05%
		Facilities That Dropped Off After REVISION							
n.		loppa Steam	346.5	1.94%	1.51%	0.82%	0.25%	0.03%	
_N	18173-8183111	ALCOA WARRICK POWER PLT AGC DIV OF AL	396.3	0.91%	1.02%	0.41%	0.62%	0.52%	0.19%

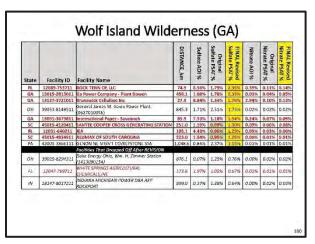




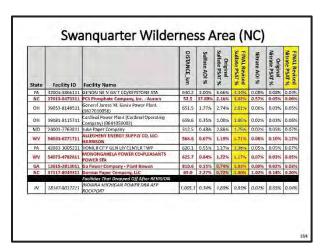


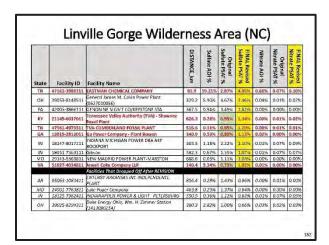


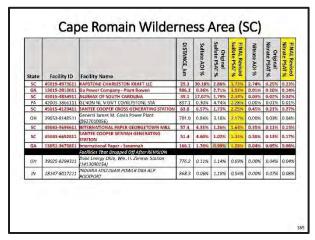


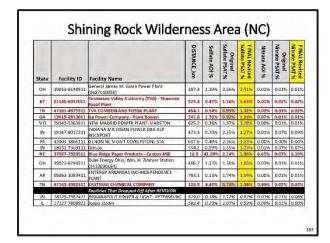


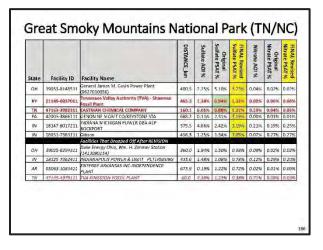
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AO) %	Original Nitrate PSAT %	Nitrate PSAT %
IN	18147-8017211	NDIANA MICHIGAN POWER DBA AEP ROCKPORT	118.0	16.88%	3.57%	1,68%	2.60%	0.26%	D.331
IN	18051-7363111	Gibson	198.2	5.21%	2.16%	1.63%	1.20%	0.35%	0.339
EV	21183-5561611	Big Rivers Electric Corp - Wilson Station	89.9	5.72%	1,07%	1.43%	0.37%	0.06%	0.065
KV	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee	233.6	1.60%	0.86%	1.15%	0.15%	0.14%	0.19
WO	29143-5363811	NEW MADRID POWER PLANT-WARSTON	312.7	0.66%	1.29%	1.16%	0.04%	0.07%	0.099
IN	18125 7362411	INDIANAPOLIS POWER & LIGHT PLTERSBURG	182.9	3.09%	1.50%	1.04%	0.96%	0.40%	0.275
		Facilities That Dropped Off After REVISION							
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	256.2	1.21%	1.43%	0.89%	0.14%	0.11%	0.129
DН	39053-8148511	General James M. Govin Power Plant (0627010056)	406.5	1:45%	1.15%	0.81%	0.04%	0.02%	0.029
AR	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	498.6	0.30%	1.15%	0.65%	0.04%	0.05%	0.021
- IN	18173 8183111	ALCOA. WARRICK POWER PLI AGC DIV OF AL	136.1	2.00%	1.03%	0.40%	1.74%	0.82%	0.305
IN	18129-8166111	Sigeca AB Brown South Indiana Gas & Ele	162.9	2.73%	1.16%	0.00%	0.27%	0.06%	0.00







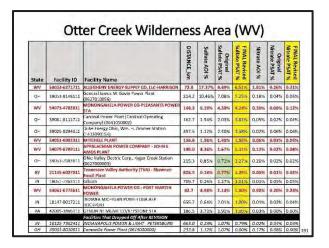




State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
он	39053-8148511	General James M. Gavin Power Plant (0627010056)	425.1	4.73%	4.69%	3,45%	0.05%	0.01%	0.01
ку	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	472.8	0.84%	0.99%	1,38%	0.05%	0.07%	0.10
TN	47163-3982311	EASTMAN CHEMICAL COMPANY	179.2	5,88%	0.93%	1,30%	0.16%	0.02%	0.02
PA.	42005-3866111	GENON NE WGWT CO/KEYSTONE STA	711.0	0.27%	2.17%	1.12%	0.00%	0.00%	0.00
IN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	391.2	4.33%	2,27%	1.12%	0.14%	0.16%	0.22
GA	13015-2813011	Ga Power Company - Plant Bowen	166.2	3.61%	0.79%	1.11%	0.10%	0.01%	0.01
IN	18051 7363111	Gibson	471.7	2.00%	1.29%	1.02%	0.11%	0.21%	0.21
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	385.1	3.63%	1.53%	1.00%	0.06%	0.01%	0.01
		Facilities That Dropped Off After REVISION							
AR.	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	674.4	1.58%	1.36%	0.81%	0.05%	0.02%	0.01
IN .		INDIANAPOLIS POWER & LIGHT PETERSBURG	453.0	2.16%	1.00%	0.72%	0.14%	0.23%	0.16
719	47145-4979111	TVA KINGSTON FOSSIL PLANT	73.7	7.86%	1.24%	0.39%	0.57%	0.10%	0.03

0-	Facility ID 54033-6271711 39053-8148511	Facility Name ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON Screen James M. Govin Power Plant	DISTANCE_km	Sulfate ADI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
0-			93.6			SC 177	%	AT %	sAT %
-	39053-8148511	General James M. Gavin Power Plant		13.58%	4.94%	7.18%	1.36%	0.26%	0.31%
wv		(0627010056)	233.8	7.62%	6.56%	4:88%	0.10%	0.03%	0.05%
	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	163.9	4.64%	4.32%	4.19%	0.16%	0.07%	0.10%
0-	39081-8115711	Carcinal Power Plant (Cardinal Operating Company) (0641050002)	163.9	1.36%	2.14%	4.02%	0.03%	0.01%	0.03%
0-	39025-8294311	Duke Fnergy Ohic, Wm. H. Zimmer Station (1413090154)	416.9	1.40%	2.25%	1.49%	0.02%	0.04%	0.05%
WV	54051-6902311	MITCHELL PLANT	144.2	1.45%	1.28%	1.42%	0.07%	0.02%	0.05%
PA.	42005-3856111	GENON NE MGMT CO/KEYSTONE STA	172.8	4.12%	2.43%	1.27%	0.01%	0.00%	0.00%
0-	39053 7983011	Ohic Valley Electric Corp., Kyger Creek Station (062/000003)	234.9	0.62%	0.66%	1.18%	0.11%	0.02%	0.02%
wv	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	219.8	3.56%	1.45%	1,18%	0.11%	0.01%	0.03%
W9	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	79.8	6.53%	1.27%	1,13%	1.07%	0.18%	0.23%
KY	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	847.6	0.12%	0.74%	1.05%	0.00%	0.01%	0.02%
		Facilities That Dropped Off After REVISION							
iN	18051 7363111	Gibsun	729.5	0.04%	1.24%	0.99%	0.02%	0.04%	0.04%
iN	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	676.3	0.44%	1.93%	0.97%	0.01%	0.02%	0.03%
δV	18125 7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	682.6	0.18%	1.05%	0.77%	0.02%	0.04%	0.03%

	Jame	s River Face Wild	err	nes	s A	rea	(V	4)	
State	Facility ID	Facility Name	DISTANCE_km	Sulfate AOI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
ОН	39053-8148511	General James M. Gavin Power Flant (0627010056)	270.2	7.66%	5,44%	4.00%	0.14%	0.08%	0.11
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC- MARRISON	207.6	2.76%	2.51%	3.65%	0.36%	0.12%	0.14
ОН	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	306.4	1.35%	1.92%	3.61%	0.04%	0.02%	0.06
WV	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	248.0	3.87%	2.33%	2.26%	0.15%	0.03%	0.05
wv	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	223.5	3,50%	2.46%	1.93%	0.13%	0.05%	0.11
PA	42005 3866111	GLNON NE V GN 1 CO/KEYSTONE STA	337.1	2,98%	2.88%	1.51%	0.06%	0.03%	0.04
VA	51580-5798711	Meadwestvaco Packaging Resource Group	46.5	12.64%	1,02%	1,45%	1.14%	0.15%	0.22
ОН	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	270.0	0.63%	0.66%	1,18%	0.16%	0.04%	0.04
WA	54051-6902311	MITCHELL PLANT	269.6	0.68%	0.97%	1.08%	0.03%	0.02%	0.04
		Facilities That Dropped Off After REVISION							
ОН	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	435.2	1.89%	1.39%	0.92%	0.05%	0.05%	0.06
- W	18051-7363111	Gibson	729.4	0.59%	1,02%	0.87%	0.02%	0.01%	0.01
W	18147-8017211	INDIANA MICHIGAN POWER DBA ALP ROCKPORT	663.5	0.56%	1.33%	2.66%	0.03%	0.01%	0.02



						(VA			
State	Facility ID	Facility Name	DISTANCE_km	Sulfate ADI %	Original Sulfate PSAT %	FINAL Revised Sulfate PSAT %	Nitrate AOI %	Original Nitrate PSAT %	Nitrate PSAT %
PA	42005-3866111	GENON NE V GW T CO/KEYSTONE STA	249.8	11.83%	8.89%	4.81%	0.10%	0.05%	0.06
он	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	269.6	1,53%	2.32%	4.50%	0.06%	0.05%	0.12
WV	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC- HARRISON	189,7	4.60%	2.75%	4,14%	0.99%	0,37%	0.46
ОН	39053-8148511	General James M. Gavin Power Plant (06270:10056)	323.4	5.25%	4.88%	3,75%	0.14%	0.10%	0.14
wv	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	265.0	4.97%	2,20%	2.20%	0.24%	0.18%	0.28
PA	42063-3005211	HOMER CITY GEN LP/ CENTER TWP	230.4	2,60%	1.56%	3.78%	0.13%	0.04%	0.06
MD	24001-7763811	Luke Paper Company	118.4	5.90%	2.20%	1.41%	0.23%	0.09%	0.14
PA.	42063-3005111	VRC WHOLESALE GEN/SEWARD GEN STA	215.5	1.80%	1.00%	1.12%	0.04%	0.02%	0.02
WV	54051-6902311	MITCHELL PLANT	251.8	1.46%	0.88%	1.01%	0.11%	0.08%	0.16
ОН	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	324.1	0.43%	0.55%	1.01%	0.16%	0.06%	0.06
		Facilities That Dropped Off After REVISION							
WV	54962-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	184.4	2.41%	1.06%	0.97%	1.27%	0.47%	0.60
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	505.4	1.31%	1.28%	0.87%	0.11%	0.05%	0.06
wv	54079-6789111	APPALACINAN POWER COMPANY JOHN E AMOS PLANT	295.6	2.09%	1.04%	0.84%	0.09%	0.09%	0.19
IN	18147-8017211	INDIANA MICHGAN POWER DBA ALP ROCKPORT	755.8	0.71%	1.46%	0.76%	0.03%	0.02%	0.03

### Appendix F-31 - VISTAS Regional Haze Project Update to EPA Region 3, Region 4, and OAQPS -July 30, 2020

### VISTAS Regional Haze Project Update



EPA Region 4, Region 3, and OAQPS Briefing Jim Boylan July 30, 2020

### Why 1% Threshold?

- In the Round 1 Regional Haze SIPs, many VISTAS states used the AOI approach and a 1% threshold on a <u>Unit</u> basis.
  - Round 2 uses the AOI/PSAT approach and a ≥ 1.00% PSAT threshold based on a Facility basis.
    - This pulled in more facilities compared to a Unit basis.
  - Round 2 uses 2028 emissions (lower than 2018)
    - This pulled in more facilities with smaller visibility impacts (in Mm<sup>-1</sup>) compared to Round 1.
- This approach results in a reasonable number of sources that can be evaluated with limited state resources and focuses on the sources and pollutants with the largest impacts.

### Outline

- Reasonable Progress
   Screening Approach
- Area of Influence
- PSAT Results
- Initial List of Sources
- EPA Discussion



### Area of Influence (AOI) Analysis

- Evaluates emissions (Q), distance to Class I area (d), and extinction weighted residence time (EWRT) in model grid cells (point) or counties (source categories)
- Formula: (Q/d)\*EWRT
- Establishes each county's and each facility's contribution to light extinction at each Class I area on the 20% most impaired days
- Can use contributions to rank and screen facilities for the four-factor analysis

### Reasonable Progress Screening Approach

- The VISTAS reasonable progress work started with AOI screening (Q/d \* EWRT) to rank sectors and facilities based on their sulfate and nitrate contributions at each Class I area.
- These rankings were used to identify 87 individual facilities for PSAT tagging. PSAT tagging was used to determine the sulfate and nitrate contributions from each facility at each Class I area in the VISTAS 12 domain.
- 3. Each individual VISTAS state will apply a PSAT contribution threshold based on the facility sulfate and facility nitrate impacts (separately, not combined) divided by the total impact of sulfate + nitrate from all point sources to determine which sources may need to be considered for a four-factor analysis.
  - If sulfate contribution ≥ 1.00% → SO<sub>2</sub> Four-Factor Analysis
  - If nitrate contribution ≥ 1.00% → NOx Four-Factor Analysis

### AOI Source Categories for WOLF

SOURCE CATEGORY	NOx	SO <sub>2</sub>	TOTAL
NONPOINT	1.7%	2.8%	4.4%
NONROAD_MAR	2.9%	1.5%	4.4%
NONROAD_OTHER	3.3%	0.3%	3.6%
ONROAD	5.7%	0.7%	6.4%
POINT	7.3%	67.9%	75.2%
PT_FIRES_PRESCRIBED	0.9%	5.1%	6.0%
TOTAL	21.8%	78.2%	100.0%

### **AOI Screening Summary**

State	Threshold	Notes
AL	2%	Sulfate only
FL	5%	Sulfate or nitrate, plus Gulf Crist, Mosaic Bartow, Mosaic Nev Wales, and Mosaic Riverview
GA	2% - 4%	Sulfate or nitrate, 2% threshold for GA facilities, 4% threshold for facilities outside GA
KY	2%	Sulfate or nitrate
MS	2%	Sulfate or nitrate
NC	3%	Sulfate + nitrate
sc	2% - 5%	2% for sulfate, 5% for nitrate, plus Santee Cooper Winyah, International Paper Georgetown, and SCE&G Williams
TN	3%	Sulfate + nitrate, plus CEMEX
VA	2%	Sulfate + nitrate
wv	0.2% - 2%	Sulfate or nitrate

### Facility Tags (KY, MS, NC, SC, TN, VA)

Facility State	Facility RPO	FACILITY ID STD	FACILITY_NAME_STD	SO2 (TPY)	NOx (TPY)
KY	VISTAS	21183-5561611	Big Rivers Electric Corp - Wilson Station	6,934.16	1,151.9
KY	VISTAS	21091-7352411	Century Aluminum of KY LLC	5,044.16	197.6
KY	VISTAS	21177-5196711	Tennessee Valley Authority - Paradise Fossil Plant	3,011.01	3,114.5
KY	VISTAS	21145-6037011	Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	19,504.75	7,007.3
MS	VISTAS	28059-8384311	Chevron Products Company, Pascagoula Refinery	741.60	1,534.1
MS	VISTAS	28059-6251011	Mississippi Power Company, Plant Victor J Daniel	231.92	3,829.7
NC	VISTAS	37087-7920511	Blue Ridge Paper Products - Canton Mill	1,127.07	2,992.3
NC	VISTAS	37117-8049311	Domtar Paper Company, LLC	687.45	1,796.4
NC	VISTAS	37035-8370411	Duke Energy Carolinas, LLC - Marshall Steam Station	4,139.21	7,511.3
NC	VISTAS	37013-8479311	PCS Phosphate Company, Inc Aurora	4,845.90	495.5
NC	VISTAS	37023-8513011	SGL Carbon LLC	261.64	21.6
SC	VISTAS	45015-4834911	ALUMAX OF SOUTH CAROLINA	3,751.69	108.0
SC	VISTAS	45043-5698611	INTERNATIONAL PAPER GEORGETOWN MILL	2,767.52	2,031.2
SC	VISTAS	45019-4973611	KAPSTONE CHARLESTON KRAFT LLC	1,863.65	2,355.8
SC	VISTAS	45015-4120411	SANTEE COOPER CROSS GENERATING STATION	4,281.17	3,273.4
SC	VISTAS	45043-6652811	SANTEE COOPER WINYAH GENERATING STATION	2,246.86	1,772.5
SC	VISTAS	45015-8306711	SCE&G WILLIAMS	392.48	992.7
TN	VISTAS	47093-4979911	Cemex - Knoxville Plant	121.47	711.5
TN	VISTAS	47163-3982311	EASTMAN CHEMICAL COMPANY	6,420.16	6,900.3
TN	VISTAS	47105-4129211	TATE & LYLE, Loudon	472.76	883.2
TN	VISTAS	47001-6196011	TVA BULL RUN FOSSIL PLANT	622.54	964.1
TN	VISTAS	47161-4979311	TVA CUMBERLAND FOSSIL PLANT	8,427.33	4,916.5
TN	VISTAS	47145-4979111	TVA KINGSTON FOSSIL PLANT	1,886.09	1,687.3
VA	VISTAS	51027-4034811	Jewell Coke Company LLP	5,090.95	520.1
VA	VISTAS	51580-5798711	Meadwestvaco Packaging Resource Group	2,115.31	1,985.6
VA	VISTAS	51023-5039811	Roanoke Cement Company	2,290.17	1.972.9

### AOI Point Contributions for Wolf Island

State	FACILITY NAME	(km)	NOx_2028 (tons/year)	502_2028 (tons/year)	NOx Contribution	SO2 Contribution
GA	Brunswick Cellulose Inc	27.9	1,554.5	294.2	2.94%	8,84%
FL	ROCK TENN CP, LLC	74,9	2,316.8	2,606.7	0.39%	8.56%
GA	International Paper - Savannah	85.9	1,560.7	3,945.4	0.24%	7.53%
FL	JEA.	105.1	651.8	2,094.5	D.0956	4.43%
GA	Georgia-Pacific Consumer Products LP (Savannah River Mill)	109,9	351.5	1,860.2	0.03%	2.65%
FL	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.	173.6	112.4	2,745.0	0.01%	1.97%
SC	ALUMAX OF SOUTH CAROLINA	223.0	108.1	3,751.7	0.00%	1.84%
FL	RAYONIER PERFORMANCE FIBERS LLC	77.4	2,327.1	562.0	0.38%	1.79%
FL	SEMINOLE ELECTRIC COOPERATIVE, INC.	181.4	917.8	3,713.4	0.0290	1.77%
OH	General James M. Gavin Power Plant (042/010056)	845.3	8,122.5	41,595.8	0.02%	1.71%
SC	SANTEE COOPER CROSS GENERATING STATION	251.0	3,273.5	4,281.2	0.09%	1,59%
GA	Southern States Phosphate & Fertilizer	84.1	1.0	597.1	0.00%	1.55%
FL	IFF CHEMICAL HOLDINGS, INC.	118.5	37.7	898.9	0.00%	1.22%
FL	DUKE ENERGY FLORIDA, INC. (DEF)	296.6	2,489.8	5,306.4	0:04%	1.19%
GA	Ga Power Company - Plant Bowen	458.1	6,643.3	10,453.4	0.03%	1.08%
GA.	Savannah Sugar Refinery	89.9	521.6	582.0	0.08%	1.06%
SC	INTERNATIONAL PAPER EASTOVER	288.7	1,780.3	3,212.9	0.05%	0.95%
GA	Ga Power Company - Plant McManus	27,1	72.2	30.1	0.14%	0.93%
5C	KAPSTONE CHARLESTON KRAFT LLC	213,6	2,355.8	1,863.7	0.09%	0.89%
PA	GENON NE NIGHT CO/KEYSTONE STA	1.048.6	6,578,5	56.939.2	0.01%	0.84%

By setting the AOI threshold at GA's levels, a reasonable number of tags and facilities were identified and 35.0% of the total sulfate + nitrate point contribution was captured.

### Facility Tags (WV, AR, MO, MD, PA, IL, IN, OH)

Facility State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 (TPY)	NOx (TPY)
wv	VISTAS	54033-6271711	ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON	10,082.94	11,830.8
WV	VISTAS	54049-4864511	AMERICAN BITUMINOUS POWER-GRANT TOWN PLT	2,210.25	1,245.1
WV	VISTAS	54079-6789111	APPALACHIAN POWER COMPANY - JOHN E AMOS PLANT	10,984.24	4,878.1
wv	VISTAS	54023-6257011	Dominion Resources, Inc MOUNT STORM POWER STATION	2,123.64	1,984.1
wv	VISTAS	54041-6900311	EQUITRANS - COPLEY RUN CS 70	0.10	511.0
WV	VISTAS	54083-6790711	FILES CREEK 6C4340	0.15	643.3
wv	VISTAS	54083-6790511	GLADY 6C4350	0.11	343.2
WV	VISTAS	54093-6327811	KINGSFORD MANUFACTURING COMPANY	16.96	140.8
wv	VISTAS	54061-16320111	LONGVIEW POWER	2,313.73	1,556.5
wv	VISTAS	54051-6902311	MITCHELL PLANT	5,372.40	2,719.6
WV	VISTAS	54061-6773611	MONONGAHELA POWER CO FORT MARTIN POWER	4,881.87	13,743.3
WV	VISTAS	54073-4782811	MONONGAHELA POWER CO-PLEASANTS POWER STA	16,817.43	5,497.3
wv	VISTAS	54061-6773811	MORGANTOWN ENERGY ASSOCIATES	828.64	655.5
AR	CENRAP	05063-1083411	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	32,050.48	14,133.1
MO	CENRAP	29143-5363811	NEW MADRID POWER PLANT-MARSTON	16,783.71	4,394.1
MD	MANE-VU	24001-7763811	Luke Paper Company	22,659.84	3,607.0
PA	MANE-VU	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	56,939.25	6,578.4
PA	MANE-VU	42063-3005211	HOMER CITY GEN LP/ CENTER TWP	11,865.70	5,215.9
PA	MANE-VU	42063-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	8,880.26	2,254.6
IL	Midwest RPO	17127-7808911	JoppaSteam	20,509.28	4,706.3
IN	Midwest RPO	18173-8183111	Alcoa Warrick Power Plt Agc Div of AL	5,071.28	11,158.5
IN	Midwest RPO	18051-7363111	Gibson	23,117.23	12,280.3
IN	Midwest RPO	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	30,536.33	8,806.7
IN	Midwest RPO	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	18,141.88	10,665.2
IN	Midwest RPO	18129-8166111	Sigeco AB Brown South Indiana Gas & Ele	7,644.70	1,578.5
ОН	Midwest RPO	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	7,460.79	2,467.3
ОН	Midwest RPO	39031-8010811	Conesville Power Plant (0616000000)	6,356.23	9,957.8
ОН	Midwest RPO	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	22,133.90	7,149.9
ОН	Midwest RPO	39053-8148511	General James M. Gavin Power Plant (0627010056)	41,595.81	8,122.5
OH	Midwest RPO	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0627000003)	3,400.14	9,143.8

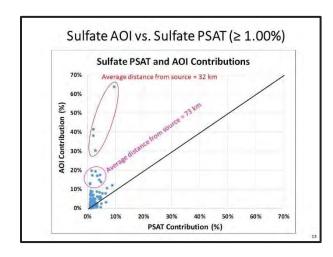
### Facility Tags (AL, FL, GA)

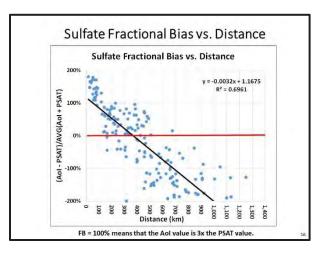
Facility State	Facility RPO	FACILITY ID STD	FACILITY NAME STD	SO2 (TPY)	NOx (TPY)
AL	VISTAS	01097-949811	Akzo Nobel Chemicals Inc	3,335.72	20.7
AL	VISTAS	01097-1056111	Ala Power - Barry	6,033.17	2,275.7
AL	VISTAS	01129-1028711	American Midstream Chatom, LLC	3,106.38	425.8
AL	VISTAS	01073-1018711	DRUMMOND COMPANY, INC.	2,562.17	1,228.5
AL	VISTAS	01053-7440211	Escambia Operating Company LLC	18,974.39	349.3
AL	VISTAS	01053-985111	Escambia Operating Company LLC	8,589.60	149.6
AL	VISTAS	01103-1000011	Nucor Steel Decatur LLC	170.23	331.2
AL	VISTAS	01109-985711	Sanders Lead Co	7,951.06	121.7
AL	VISTAS	01097-1061611	Union Oil of California - Chunchula Gas Plant	2,573.15	349.2
FL	VISTAS	12123-752411	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	1,520.42	1,830.7
FL	VISTAS	12086-900111	CEMEX CONSTRUCTION MATERIALS FL. LLC.	29.51	910.3
FL	VISTAS	12017-640611	DUKE ENERGY FLORIDA, INC. (DEF)	5,306.41	2,489.8
FL	VISTAS	12086-900011	FLORIDA POWER & LIGHT (PTF)	13.05	170.6
FL	VISTAS	12033-752711	GULF POWER - Crist	2,615.65	2,998.3
FL	VISTAS	12086-3532711	HOMESTEAD CITY UTILITIES	0.00	97.0
FL	VISTAS	12031-640211	JEA	2,094.48	651.7
FL	VISTAS	12105-717711	MOSAIC FERTILIZER LLC	7,900.67	310.4
FL	VISTAS	12057-716411	MOSAIC FERTILIZER, LLC	3,034.06	159.7
FL	VISTAS	12105-919811	MOSAIC FERTILIZER, LLC	4,425.56	141.0
FL	VISTAS	12089-845811	RAYONIER PERFORMANCE FIBERS LLC	561.97	2,327.1
FL	VISTAS	12089-753711	ROCK TENN CP, LLC	2,606.72	2,316.7
FL	VISTAS	12005-535411	ROCKTENN CP LLC	2,590.88	1,404.8
FL	VISTAS	12129-2731711	TALLAHASSEE CITY PURDOM GENERATING STA.	2.86	121.4
FL	VISTAS	12057-538611	TAMPA ELECTRIC COMPANY (TEC)	6,084.90	2,665.0
FL	VISTAS	12086-899911	TARMAC AMERICA LLC	9.38	879.7
FL	VISTAS	12047-769711	WHITE SPRINGS AGRICULTURAL CHEMICALS, INC	3,197,77	112.4
GA	VISTAS	13127-3721011	Brunswick Cellulose Inc	294.20	1,554.5
GA	VISTAS	13015-2813011	Ga Power Company - Plant Bowen	10,453.41	6,643.3
GA	VISTAS	13103-536311	Georgia-Pacific Consumer Products LP (Savannah River Mill)	1,860.18	351.5
GA	VISTAS	13051-3679811	International Paper – Savannah	3,945.38	1,560.7
GΑ	VISTAS	13115-539311	TEMPLE INLAND	1,791.00	1.773.3

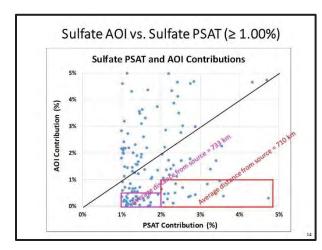
### **PSAT Source Apportionment Modeling**

- Quantifies visibility impacts from individual point sources, source sectors, and geographic regions
- NOx and SO<sub>2</sub> tagging
- · Used for further evaluation of AOI results
- Refines information on contributions to visibility impairment
- Can be used to adjust future year visibility projections to account for additional emission controls
- VISTAS contract with ERG allows for up to 250 tags

12

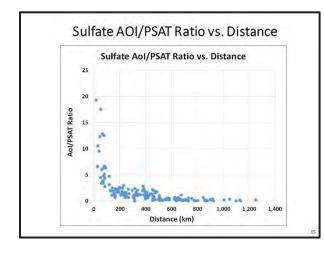






### AOI vs. PSAT Summary

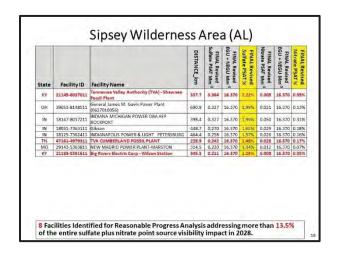
- AOI tends to overestimate impacts for facilities near the Class I area. This brought in more nearby sources.
- AOI tends to underestimate impacts for facilities far away from the Class I area. This may miss some far away sources, but they are likely being captured by other Class I areas that are closer to those sources.
- PSAT is the most reliable modeling tool for tracking facility contributions to visibility impairment at Class I areas.

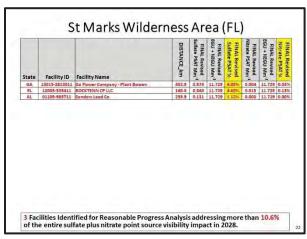


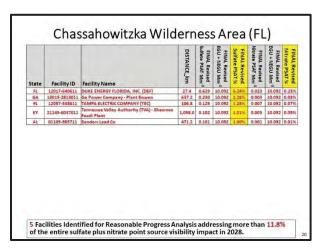
### PSAT Reasonable Progress Screening • The facility sulfate and nitrate contributions (Mm<sup>-1</sup>) from the individual 87 tagged facilities should not change unless a facility has reduced or increased SO<sub>2</sub> and/or NOx emissions. • The updated 2028 CAMx modeling will impact the total sulfate and total nitrate contribution from point sources at each Class I area since the SO<sub>2</sub> and NOx emissions have decreased. • The facility percent contribution will increase even if the facility emissions do not change since the denominator will decrease

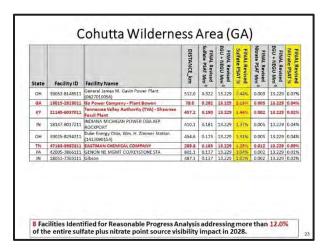
Facility Sulfate Contribution (%) =

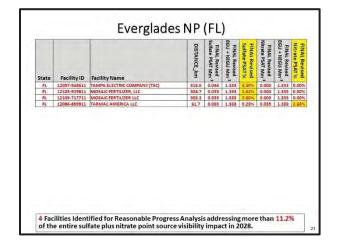
Facility Sulfate Impact (Mm<sup>-1</sup>) 
Total Impact of All Point Sources of Sulfate + Nitrate (Mm<sup>-1</sup>)

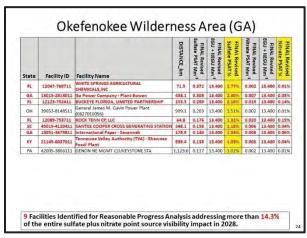


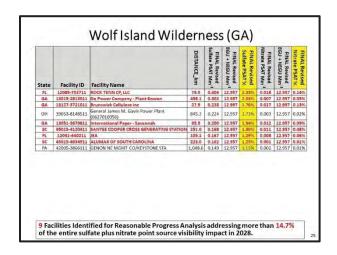


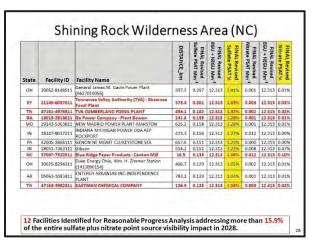


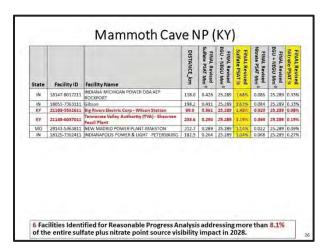


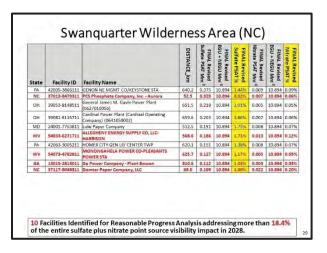


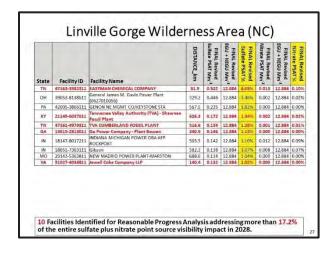


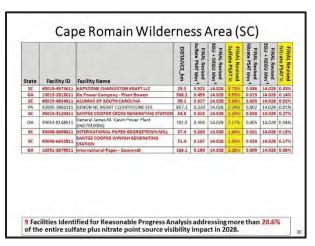


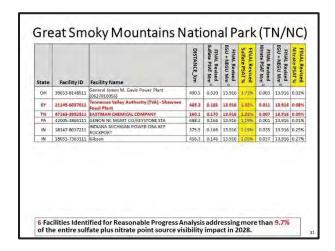


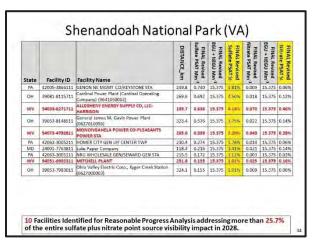


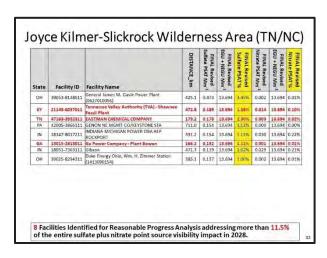


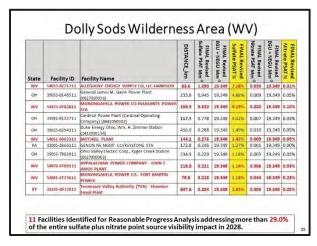


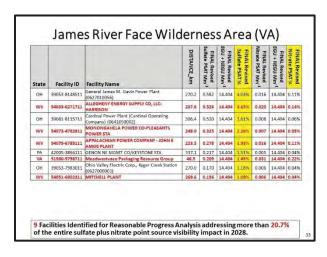


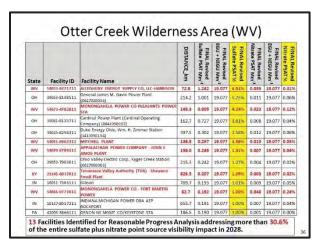












### Non-VISTAS Class I Areas

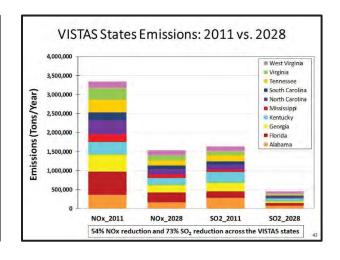
- Only two VISTAS facilities have a contribution
   ≥ 1.00% at any non-VISTAS Class I Area
- ALLEGHENY ENERGY SUPPLY CO, LLC-HARRISON (WV)
  - Moosehorn Wilderness EDM (1.06% sulfate)
- Tennessee Valley Authority (TVA) Shawnee Fossil Plant (KY)
  - Caney Creek Wilderness Area (1.09% sulfate)
  - Hercules-Glades Wilderness Area (1.95% sulfate)
  - · Mingo Wilderness Area (1.47% sulfate)
  - · Great Gulf Wilderness Area (1.03% sulfate)
  - Presidential Range-Dry River Wilderness (1.03% sulfate)

IN IN IN MD MO OH	18051-7363111	ENTERGY ARKANSAS INC-INDEPENDENCE PLANT	SHRO	
IN IN MD MO				
IN MD MO		Gibson	COHU, GRSM, JOYC, LIGO, MACA, OTCR, SHRO, SIPS	
MD	18147-8017211	INDIANA MICHIGAN POWER DBA AEP ROCKPORT	COHU, GRSM, JOYC, LIGO, MACA, OTCR, SHRO SIPS	
MO	18125-7362411	INDIANAPOLIS POWER & LIGHT PETERSBURG	MACA, SIPS	
	24001-7763811	Luke Paper Company	SHEN, SWAN	
OH		NEW MADRID POWER PLANT-MARSTON	LIGO, MACA, SHRO, SIPS	
	39081-8115711	Cardinal Power Plant (Cardinal Operating Company) (0641050002)	DOSO, JARI, OTCR, SHEN, SWAN	
OH	39025-8294311	Duke Energy Ohio, Wm. H. Zimmer Station (1413090154)	COHU, DOSO, JOYC, OTCR, SHRO	
ОН		General James M. Gavin Power Plant (0627010056)	COHU, DOSO, GRSM, JARI, JOYC, LIGO, OKEF, OTCR, ROMA, SHEN, SHRO, SIPS, SWAN, WOLF	
ОН	39053-7983011	Ohio Valley Electric Corp., Kyger Creek Station (0527000003)	DOSO, JARI, OTCR, SHEN	
PA	42005-3866111	GENON NE MGMT CO/KEYSTONE STA	COHU, DOSO, GRSM, JARI, JOYC, LIGO, OKEF, OTCR, ROMA, SHEN, SHRO, SWAN, WOLF	
PA	42063-3005211	HOMER CITY GEN LP/ CENTER TWP	SHEN, SWAN	
PA	42063-3005111	NRG WHOLESALE GEN/SEWARD GEN STA	SHEN	

VISTAS FEDERAL CLASS I AREAS	Number of Facilities	Percent of Point Sulfate + Nitrate
AL – Sipsey Wilderness Area (SIPS)	8	13.5%
FL – Chassahowitzka Wilderness Area (CHAS)	5	11.8%
FL – Everglades National Park (EVER)	4	11.2%
FL – Saint Marks Wilderness Area (SAMA)	3	10.6%
GA – Cohutta Wilderness Area (COHU)	8	12.0%
GA – Okefenokee Wilderness Area (OKEF)	9	14.3%
GA - Wolf Island Wilderness Area (WOLF)*	9	14.7%
KY - Mammoth Cave National Park (MACA)	6	8.1%
NC – Linville Gorge Wilderness Area (LIGO)	10	17.2%
NC – Shining Rock Wilderness Area (SHRO)	12	15.9%
NC – Swanquarter Wilderness Area (SWAN)	10	18.4%
SC – Cape Romain Wilderness Area (ROMA)	9	20.6%
TN/NC - Great Smoky Mountains National Park (GRSM)	6	9.7%
TN/NC - Joyce Kilmer-Slickrock Wilderness Area (JOYC)*	8	11.5%
VA – James River Face Wilderness Area (JARI)	9	20.7%
VA – Shenandoah National Park (SHEN)	10	25.7%
WV – Dolly Sods Wilderness Area (DOSO)	11	29.0%
WV – Otter Creek Wilderness Area (OTCR)*	13	30.6%
AVERAGE	8.3	16.4%

### Thoughts for Discussion

- VISTAS used a screening approach with AoI (various thresholds) and PSAT (1.00% threshold). This resulted in an average of 8+ facilities per Class I area and accounts for an average of 16.4% of the point source sulfate + nitrate contributions. This should be more than adequate especially accounting for all the other recent emission controls that are already built into our 2028 emission projections (next slide).
- The VISTAS focus is on significant emission impacts on Class I areas, not on the number of facilities evaluated in each state.
- Some facilities may be interested in taking permit limits resulting in adjusted PSAT impacts below the 1.00% threshold, thus avoiding the four-factor analysis.
- We are uncertain of the documentation required to apply the four factor analysis off-ramps (e.g., MATS) discussed in the August 2019 guidance.
- We are not aware of the triggers that might require incorporation of permit conditions into the Regional Haze SIPs.



### Contacts for Further Information

- For general, technical, and SIP-related questions, contact the TAWG and CC Co-chairs:

  - TAWG Randy Strait (randy.strait@ncdenr.gov)
    TAWG Doris McLeod (doris.mcleod@deq.virginia.gov)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
  - CC Jimmy Johnston (<u>james.johnston@tn.gov</u>)
- For project and contract management questions, contact the Project Manager:
  - John Hornback (hornback@metro4-sesarm.org)



### Appendix F-3m - VISTAS Regional Haze Project Update, August 4, 2020

### VISTAS Regional Haze Project Update



EPA, FLM, RPO Briefing Jim Boylan August 4, 2020

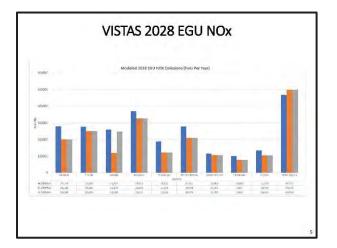
### Overview

- During the QA process, an issue was identified with the emissions used in the CAMx modeling that was previously presented on May 20, 2020
- The emissions inventory was correct, but some SO<sub>2</sub> and NOx emissions from EGUs were dropped during the SMOKE processing
- This issues does not impact any of the PSAT modeling or adjustments to the PSAT modeling
- This issue does impact the projected visibility in 2028 for comparison to the URP glide slope

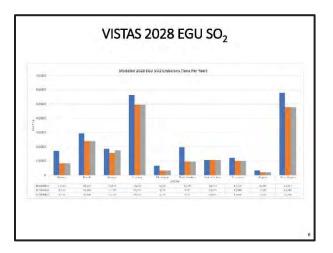
### Outline

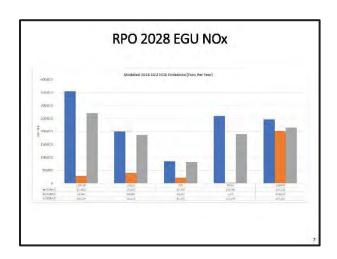
- Recent Issue with 2028 Modeling
- Updated 2028 Model Projections
- Next Steps & Schedule



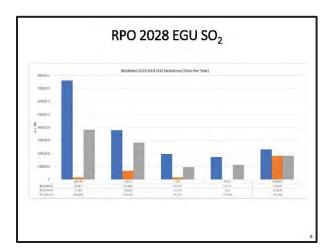


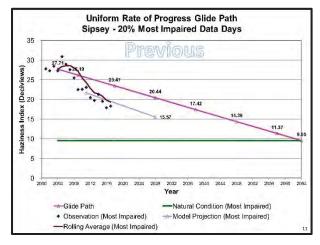
### Recent Issue with 2028 Modeling

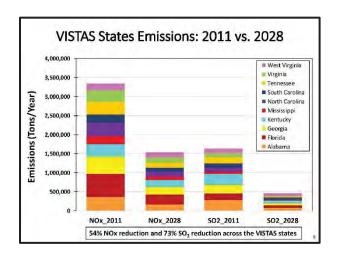


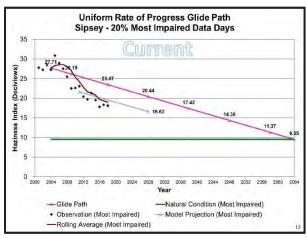


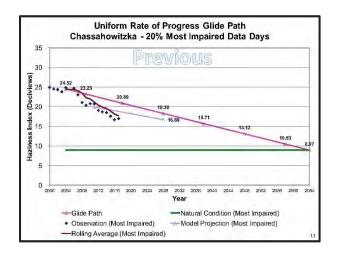


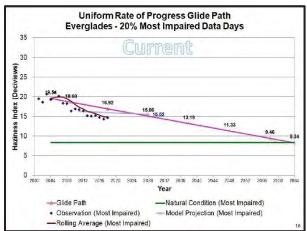


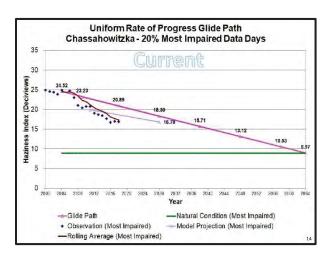


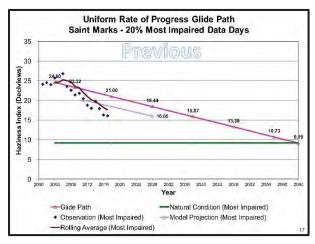


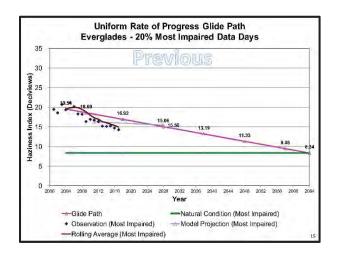


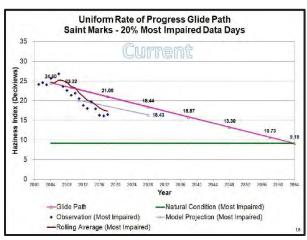


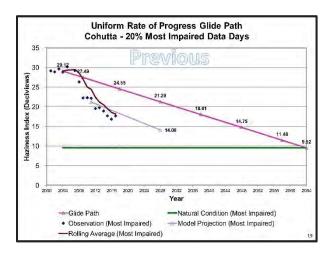


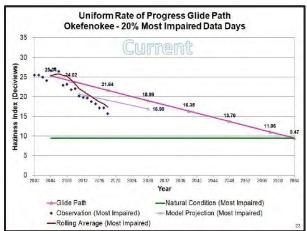


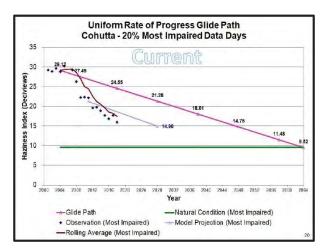


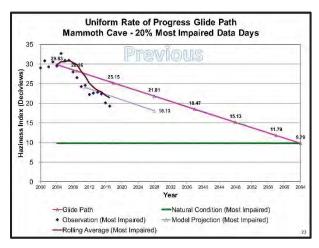


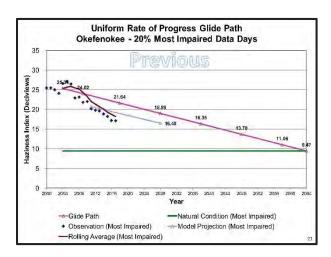


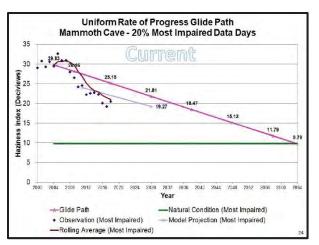


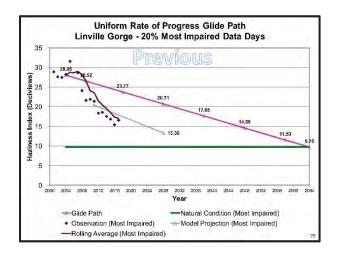


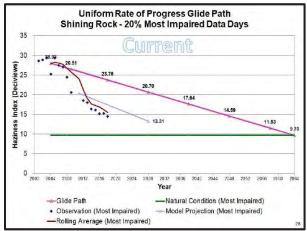


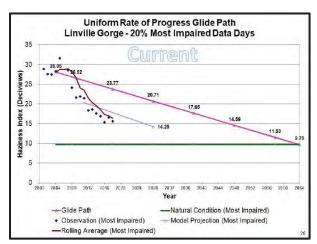


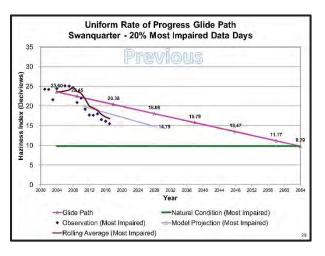


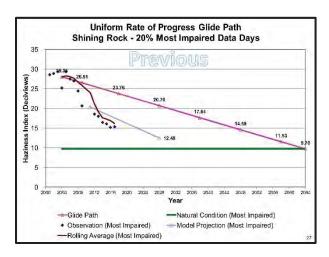


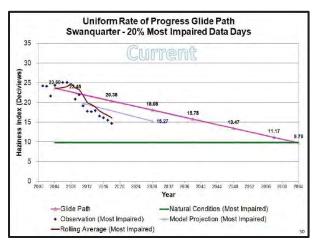


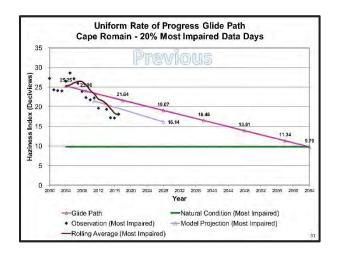


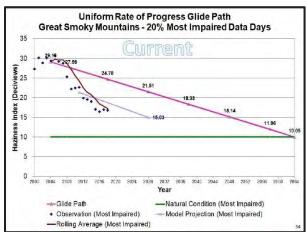


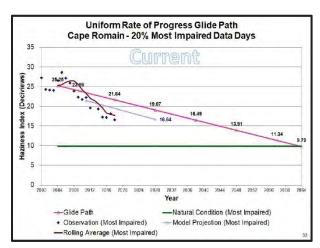


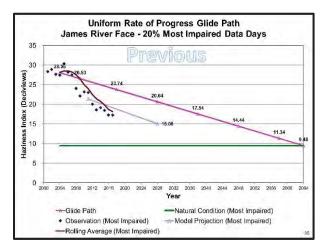


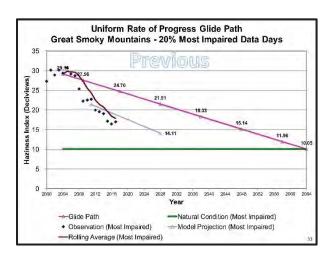


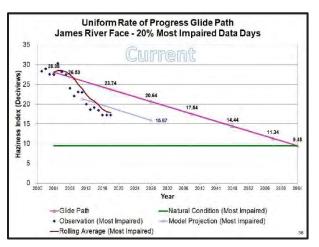


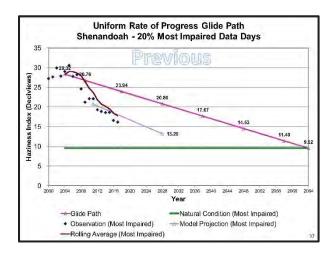


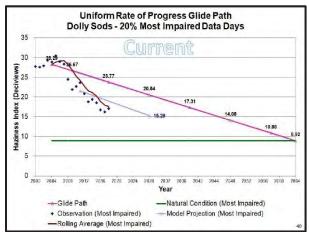


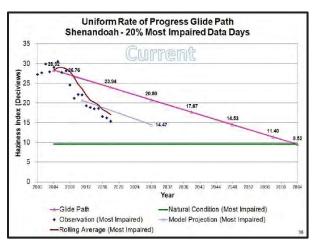


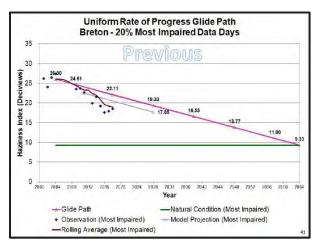


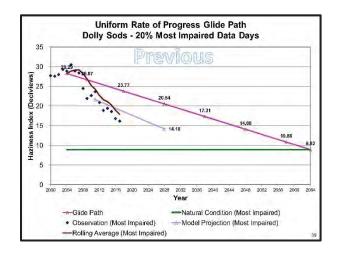


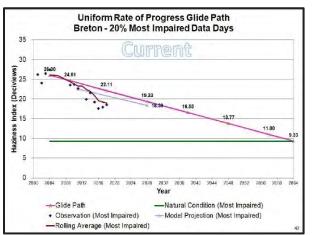


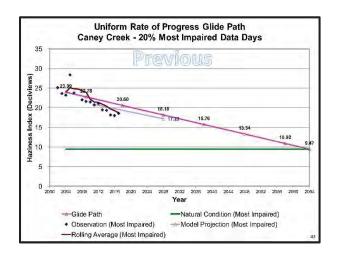


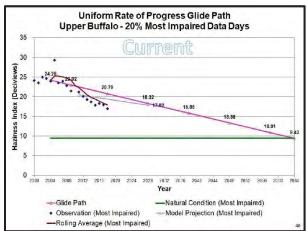


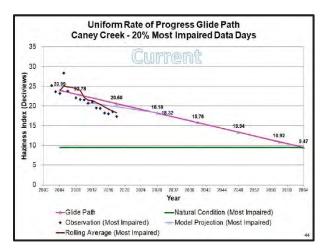


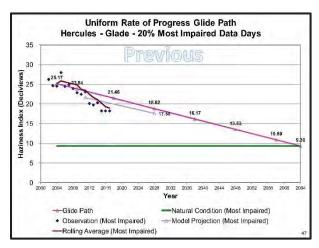


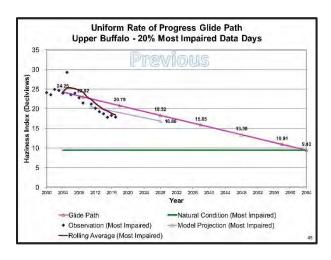


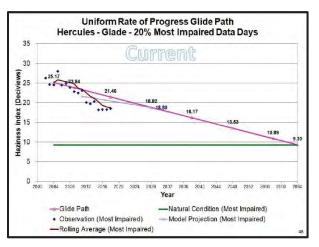


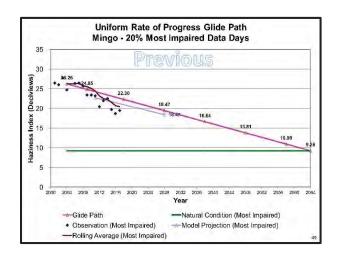


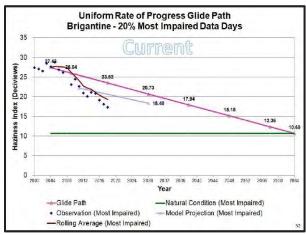


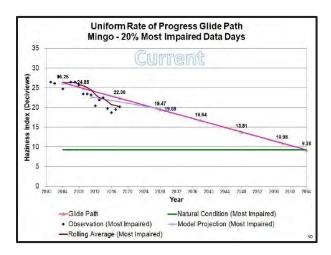




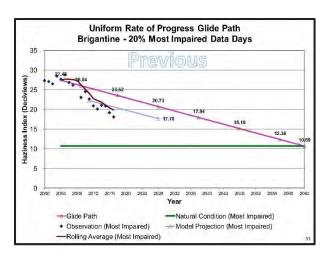


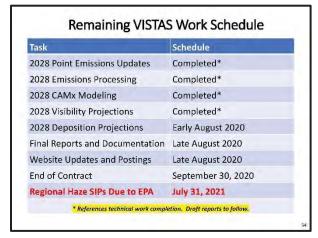












# **Contacts for Further Information**

- For general, technical, and SIP-related questions, contact the TAWG and CC Co-chairs:
  - TAWG Randy Strait (randy.strait@ncdenr.gov)
  - TAWG Doris McLeod (doris.mcleod@deq.virginia.gov)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
  - CC Jimmy Johnston (<u>james.johnston@tn.gov</u>)
- For project and contract management questions, contact the Project Manager:
  - John Hornback (hornback@metro4-sesarm.org)



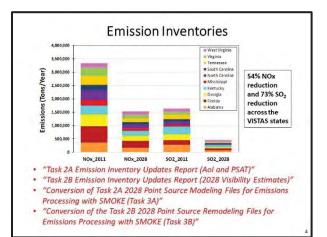
55

# Appendix F-3n - EPA Region 4 Fall 2020 Air Director's Meeting-Regional Haze Update October 26, 2020

# VISTAS II Regional Haze Project Update

Jim Boylan (GA DNR), Randy Strait (NC DAQ), Doris McLeoad (VA DEQ), Jimmy Johnston (TN DEC), Chad LaFontaine (Metro 4/SESARM), and John Hornback (Metro 4/SESARM)

> EPA Region 4 Fall 2020 Air Director's Meeting October 26, 2020



# Project Background

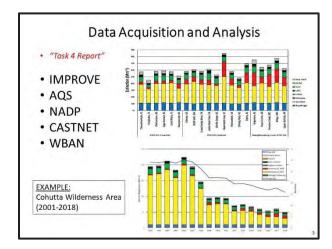
- Goal was to provide states with technical information needed to draft their regional haze SIPs
- · Project started in December 2017
- · Expenses are less than 80% of budget
- Initial tasks: RFP, bids, contractor selection, contract development, work plan, QAPP, and modeling protocol
- · Contractor support provided by:





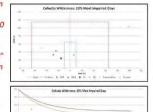
# Air Quality Modeling

- "2011el and 2028el CAMx Benchmarking Report Task 6 Benchmark Report #1 Covering Benchmark Runs #1 and #2"
- "2011el CAMx Version 6.32 and 6.40 Comparison Report Task 6 Benchmark Report Number #2 Covering Benchmark Run #3"
- 2310 CONUS\_12 2 2310 R32 0 0 150 150 150 20 20 300 250 306-1620
- "2028 CAMx Version 6.32 and 6.40 Comparison Report Task 6 Benchmark Report #4 Covering Benchmark Run #4"
- "2011el CAMx Version 6.40 12km VISTAS and EPA 12km Continental Grid Comparison Report Benchmark Report Task 6 Benchmark Report #3 Covering Benchmark Run #5"
- "2028elv3 CAMx Version 6.40 12km VISTAS and EPA 12km Continental Grid Comparison Report Benchmark Report Number #6 for Task 6"
- "2028 Emissions Version V3 and V5 Comparison Report Benchmark Report Task 6 Benchmark Report #6 Covering Benchmark Run #7"

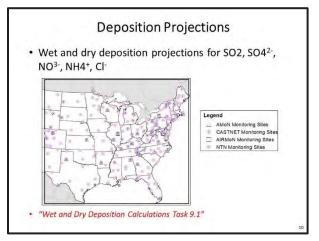


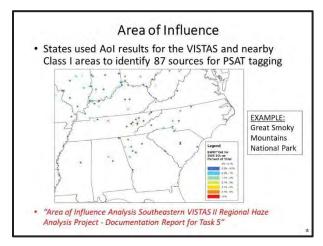
# Model Performance Evaluation

- "Model Performance Evaluation for Particulate Matter and Regional Haze of the CAMx 6.40 Modeling System and the VISTAS II 2011 Updated Modeling Platform for Task 8.0"
- "Model Performance Evaluation for Ozone of the CAMx 6.40 Modeling System and the VISTAS II 2011 Updated Modeling Platform (Task 8.0)"
- "Deposition Model Performance Evaluation Southeastern VISTAS II Regional Haze Analysis Project (Task 8.1)"

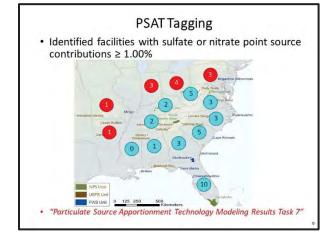








# Final Project Report Covers everything in previous slides: Task 2 – Emissions Inventories Task 3 – Emissions Processing Task 4 – Data Acquisition and Analysis Task 5 – Area of Influence Task 6 – 2011 and 2028 Photochemical Modeling Task 7 – PSAT Tagging Task 8 – Model Performance Evaluation Task 9 – Visibility and Deposition Projections Task 10 – Data Handling Sharing Task 11 – Extraction of State-Specific modeling, IC/BC, and meteorology



# Consultation & Communication

- FLMs and EPA
  - Multiple VISTAS presentations on technical work
- Non-VISTAS states
  - Multiple VISTAS presentations on technical work
  - · Letters to non-VISTAS states from SESARM
- VISTAS states
  - State to state phone calls and e-mails
  - Letters to VISTAS states from other VISTAS states
- Stakeholders
  - One VISTAS presentation on technical work
  - · Letters to specific facilities from home states

12

# 4-Factor Analysis

- States will evaluate certain sources and emissions to determine if reasonable controls are in place or available
- Considers four important factors:
  - Potential costs of compliance (\$/ton, \$/Mm<sup>-1</sup>)
  - · Time necessary for compliance
  - · Energy and non-air quality environmental impacts of compliance
  - Remaining useful life of sources subject to this analysis

### **FLM Consultation Requirements**

### 40 CFR 51.308(i)(2) (in pertinent part):

...The State must provide the Federal Land Manager with an opportunity for consultation, in person at a point early enough in the State's policy analyses of its long-term strategy emission reduction obligation so that information and recommendations provided by the Federal Land Manager can meaningfully inform the State's decisions on the long-term strategy. The opportunity for consultation will be deemed to have been early enough if the consultation has taken place at least 120 days prior to holding any public hearing or other public comment opportunity on an implementation plan (or plan revision) for regional haze required by this subpart. The opportunity for consultation on an implementation plan (or plan revision) or on a progress report must be provided no less than 60 days prior to said public hearing or public comment opportunity....

### SIP Template Outline

- 1. Introduction
- 2. Natural Background Conditions and Assessment of Baseline, Modeling Base Period, and Current Conditions
- Glidepaths to Natural Conditions in 2064
- Types of Emissions Impacting Visibility Impairment
- Regional Haze Modeling Methods and Inputs
- Model Performance **Fvaluations**

- 7. 2028 Model Projections
- Long-Term Strategy
- Reasonable Progress Goals
- 10. Monitoring Strategy
- 11. Consultation Process
- 12. Comprehensive Periodic Implementation Plan Revisions
- 13. Determination of the Adequacy of the Existing Plan
- 14. Progress Report

**APPENDICES** 

Dates	Milestone
Week of 11/2/2020	Send redacted template to EPA R4 and R3. Redacted sections to include those dealing with reasonable progress facility selection and four-factor analysis results. Would like to receive feedback on missing analyses or "show stoppers."
11/5/2020 - 12/4/2020	EPA review period
12/7/2020 - 12/15/2020	SIP template workgroup to address EPA's comments
12/15/2020 - 1/15/2021	Develop state-specific draft
1/15/2021 - 1/30/2021	States to address EPA's comments
1/30/2020 - 4/30/2020	Consultation period for FLMs (may vary by state)
4/30/2021 - 5/30/2021	Address FLM comments
5/30/2021 - 6/30/2021	Public comment period
6/30/2021 - 7/31/2021	Address public comment and finalize package for submission
7/31/2021	Regional Haze SIP due to EPA

# **Current Work Topics**

- · Cost thresholds for four-factor analyses: workgroup in place to evaluate available information
- Use of off-ramps for four-factor analyses
- Inclusion of various requirements in the SIP as opposed to federally enforceable permits such as construction permits or state operating permits
- NPS and NPCA source listings: some states are in an ongoing dialogue with these groups
- EPA Region 4 source list analysis
- Communications with other states outside of VISTAS for information on facilities impacting VISTAS Class I areas
- How to address face-to-face consultation requirement with FLMs in light of the pandemic? (next slide)

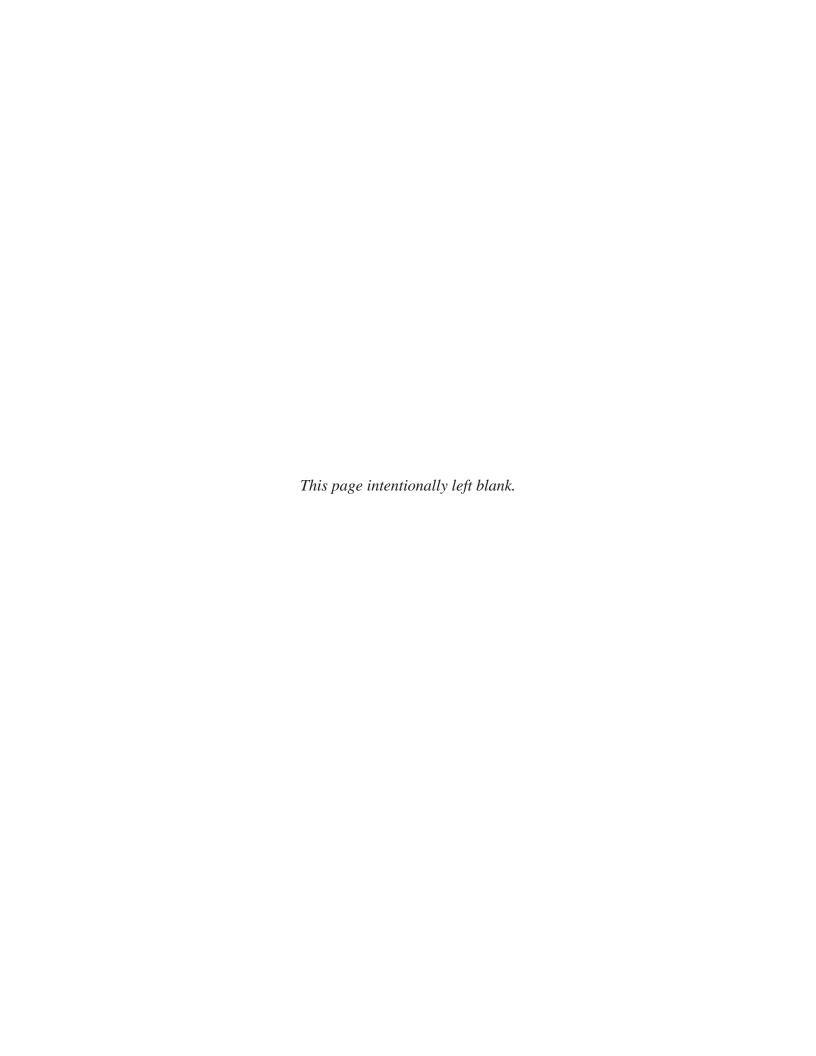
Contacts for Further Information

- · For general, technical, and SIP-related questions, contact the TAWG and CC Co-chairs:
  - TAWG Randy Strait (randy.strait@ncdenr.gov)
  - TAWG Doris McLeod (doris.mcleod@deq.virginia.gov)
  - CC Jim Boylan (james.boylan@dnr.ga.gov)
  - CC Jimmy Johnston (james.johnston@tn.gov)
- For project and contract management questions, contact the Project Manager:
  - · Chad LaFontaine (clafontaine@metro4-sesarm.org)



# **Appendix F-30**

# FLM Consultation Letters December 14, 2022





# State of Mississippi

# TATE REEVES

Governor

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

Via Electronic Mail

December 14, 2022

Ms. Melanie Peters National Park Service Melanie Peters@nps.gov

Subject: Federal Land Manager Consultation – Draft Regional Haze SIP Revision for Second Implementation Period

Dear Ms. Peters,

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) and subsequent revisions that provide for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Mississippi has no Class I areas within its borders and, therefore, evaluated a long-term strategy and monitoring strategy to address emissions from Mississippi that may affect Class I areas outside the state.

Pursuant to 40 CFR 51.308(i)(2), Mississippi must provide the Federal Land Managers (FLMs) with an opportunity for consultation on the draft Regional Haze SIP Revision (SIP Revision) no less than 60 days prior to the start of the public comment period on the draft SIP Revision.

With this letter, the Mississippi Department of Environmental Quality (Department) is providing the National Park Service with Mississippi's draft SIP Revision for the second implementation period, including the progress report required by 40 CFR 51.308(f)(5), to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the draft SIP Revision by February 13, 2023, and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the proposed Regional Haze SIP Revision and will address all FLM comments in the final Regional Haze SIP Revision submittal.

The Department can provide any supporting documentation upon request. If you have any questions, please contact Carla Brown at 601-961-5561 (cbrown@mdeq.ms.gov) or Matt Carpenter at 601-961-5164 (mcarpenter@mdeq.ms.gov).

Sincerely,

Melissa Fortenberry, P.E.

Chief, Air Division



# State of Mississippi

# TATE REEVES

Governor

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

# Via Electronic Mail

December 14, 2022

Mr. Tim Allen U.S. Fish & Wildlife Service Tim Allen@fws.gov

Subject: Federal Land Manager Consultation – Draft Regional Haze SIP Revision for Second Implementation Period

Dear Mr. Allen.

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) and subsequent revisions that provide for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Mississippi has no Class I areas within its borders and, therefore, evaluated a long-term strategy and monitoring strategy to address emissions from Mississippi that may affect Class I areas outside the state.

Pursuant to 40 CFR 51.308(i)(2), Mississippi must provide the Federal Land Managers (FLMs) with an opportunity for consultation on the draft Regional Haze SIP Revision (SIP Revision) no less than 60 days prior to the start of the public comment period on the draft SIP Revision.

With this letter, the Mississippi Department of Environmental Quality (Department) is providing the U.S. Fish & Wildlife Service with Mississippi's draft SIP Revision for the second implementation period, including the progress report required by 40 CFR 51.308(f)(5), to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the draft SIP Revision by February 13, 2023, and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the proposed Regional Haze SIP Revision and will address all FLM comments in the final Regional Haze SIP Revision submittal.

The Department can provide any supporting documentation upon request. If you have any questions, please contact Carla Brown at 601-961-5561 (cbrown@mdeq.ms.gov) or Matt Carpenter at 601-961-5164 (mcarpenter@mdeq.ms.gov).

Sincerely,

Melissa Fortenberry, P.E.

Chief, Air Division



# State of Mississippi

# TATE REEVES

Governor

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

Via Electronic Mail

December 14, 2022

Ms. Melanie Pitrolo U.S. Forest Service Melanie.Pitrolo@usda.gov

Subject: Federal Land Manager Consultation – Draft Regional Haze SIP Revision for Second Implementation Period

Dear Ms. Pitrolo,

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) and subsequent revisions that provide for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Mississippi has no Class I areas within its borders and, therefore, evaluated a long-term strategy and monitoring strategy to address emissions from Mississippi that may affect Class I areas outside the state.

Pursuant to 40 CFR 51.308(i)(2), Mississippi must provide the Federal Land Managers (FLMs) with an opportunity for consultation on the draft Regional Haze SIP Revision (SIP Revision) no less than 60 days prior to the start of the public comment period on the draft SIP Revision.

With this letter, the Mississippi Department of Environmental Quality (Department) is providing the U.S. Forest Service with Mississippi's draft SIP Revision for the second implementation period, including the progress report required by 40 CFR 51.308(f)(5), to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the draft SIP Revision by February 13, 2023, and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the proposed Regional Haze SIP Revision and will address all FLM comments in the final Regional Haze SIP Revision submittal.

The Department can provide any supporting documentation upon request. If you have any questions, please contact Carla Brown at 601-961-5561 (cbrown@mdeq.ms.gov) or Matt Carpenter at 601-961-5164 (mcarpenter@mdeq.ms.gov).

Sincerely,

Melissa Fortenberry, P.E.

Chief, Air Division

cc: Jeremy Ash, U.S. Forest Service (jeremy.ash@usda.gov)