

# **Appendix G**

## **Comments Received, Responses, and Hearing Transcript**

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## **Appendix G-1: FLM Comments**

## Carla Brown

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**From:** Peters, Melanie <Melanie\_Peters@nps.gov>  
**Sent:** Tuesday, February 7, 2023 3:37 PM  
**To:** Carla Brown; Matt Carpenter  
**Cc:** Cheek, Denesia; Renfro, Jim; Shepherd, Don; Stacy, Andrea; Miller, Debra C; Salazer, Holly; King, Kirsten L; Allen, Tim; Deal, Jacob - FS; Pitrolo, Melanie -FS; Notarianni, Michele; Williams-Miles, Pearlene; Ming, Jaron E  
**Subject:** NPS Mississippi Regional Haze Consultation

### This Message Is From an External Sender

This message came from outside your organization.

Hello Carla,

The National Park Service (NPS) appreciates the opportunity to review the December 14, 2022 pre-draft of the Mississippi Regional Haze State Implementation Plan (SIP) (2018–2028 Planning Period). We gratefully acknowledge that staff from the Mississippi Department of Environmental Quality offered to hold a consultation meeting with the NPS. Given the relatively small influence of regional haze emissions from Mississippi on NPS-managed Class I areas, we did not elect to schedule a consultation call. Please consider this email documentation of high-level NPS conclusions and recommendations regarding the draft Mississippi Regional Haze SIP. As a reminder, NPS-managed areas are the focus of our review—we do not speak for or represent Class I areas administered by other agencies.

We commend Mississippi for developing a well-organized, detailed SIP, and for offering to engage with the NPS during the Federal Land Manager (FLM) consultation period. We also recognize and appreciate the significant emission reductions and visibility improvements that Mississippi has achieved in the last decade. Still, reasonable progress requires that incremental improvements continue in each planning period as we advance toward the ultimate visibility goal of no human-caused visibility impairment in Class I areas. It is with this in mind that we offer the following conclusions and recommendations.

In a May 17th, 2021 email to Mississippi and other VISTAS states, the NPS Air Resources Division conveyed several concerns with the VISTAS analysis methods/approaches and outcomes in this round of SIP development. Our primary concern is that the individual facility percent contribution approach to source selection used by VISTAS and Mississippi offers less protection for the more-impacted Class I areas and did not adequately identify visibility-impairing sources for consideration. However, when the NPS re-evaluated source selection recommendations using VISTAS data (AOI \* EWRT) we found that no Mississippi sources contribute to the top 80% of visibility impairment in any NPS-managed Class I area. Therefore, we do not recommend any additional Mississippi sources for consideration in this planning period.

Mississippi, like other VISTAS states, excluded nitrogen oxides (NO<sub>x</sub>) from reasonable progress four-factor analyses and/or effective control demonstrations. Consistent with our feedback to other VISTAS states, we encourage Mississippi to consider both sulfur dioxide (SO<sub>2</sub>) and NO<sub>x</sub> emission control opportunities for selected sources in this and future planning periods. Light extinction from ammonium nitrate is an increasingly important component of haze on most-impacted days in recent years in Class I areas across the region.

As the draft SIP demonstrates, the two boilers at the Mississippi Power Company, Plant Victor J Daniel (Plant Daniel), selected by Mississippi, have very low annual SO<sub>2</sub> emissions (about 150 tons/year total). However, this same facility emitted over 4,000 tons/year of NO<sub>x</sub> in recent years. We encourage Mississippi to use the four-factor analysis process to evaluate NO<sub>x</sub> emission control opportunities for Plant Daniel in this planning period and require any reasonable controls

identified. Failing to do so may be a missed opportunity to reduce haze-causing emissions from a facility that Mississippi has identified as a significant contributor to visibility impairment.

Clean air and clear views are essential to the preserving the fundamental purpose of our national parks and ensuring the enjoyment of park resources for the American public both now and in the future. There is still progress needed to achieve the regional haze goal of no human-caused visibility impairment across the VISTAS region. We look forward to continuing working to improve air quality in partnership with Mississippi in this and future planning periods. If you have any questions, please reach out to us.

Best,  
Melanie

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Melanie V. Peters  
NPS, Air Resources Division

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**File Code:** 2580  
**Date:** February 9, 2023

Carla Brown  
Air Inventory & Attainment Branch Manager  
Mississippi Department of Environmental Quality  
515 East Amite Street  
Jackson, MS 39201

Dear Ms. Carla Brown,


On December 14, 2022, the State of Mississippi submitted a draft Regional Haze State Implementation Plan describing your proposal to continue improving air quality by reducing regional haze impacts at mandatory Class I areas across the region. We appreciate the opportunity to work closely with your State through the initial evaluation, development, and subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I areas.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service, has received and conducted a substantive review of your proposed Regional Haze State Implementation Plan. This review satisfies your requirements under the federal regulations 40 C.F.R. § 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the authority to approve the document.

We have attached comments to this letter based on our review. We look forward to your response required by 40 C.F.R. § 51.308(i)(3). For further information, please contact Jacob Deal ([jacob.deal@usda.gov](mailto:jacob.deal@usda.gov)).

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

Sincerely,

 **Cherie E  
Hamilton**

Digitally signed by Cherie E  
Hamilton  
Date: 2023.02.13 09:38:06  
-06'00'

**CHERIE HAMILTON**  
Forest Supervisor

Enclosure

cc: Melanie Pitrolo



## **Enclosure**

### **USDA Forest Service Technical Comments on Mississippi Department of Environmental Quality (DEQ) Draft Regional Haze State Implementation Plan (SIP)**

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We appreciate the opportunity to work with your agency through the initial evaluation, development, and now, subsequent review of this plan. The below are items that are of interest to the USDA Forest Service.

#### **Source Considerations and Screening Threshold**

The DEQ used Particulate Matter Source Apportionment Technology (PSAT) to identify sources that contribute  $\geq 1\%$  total visibility impairment caused by sulfate or nitrate at any Class I Area in 2028 within the VISTAS modeling domain. The USDA Forest Service greatly appreciates this approach as aggregating the contributions of these pollutants may exclude feasible, cost-effective control options for a single pollutant. This methodology resulted in a selection of two facilities for reasonable progress analyses.

#### **Class I Impact Modeling**

There are no Class I Areas within the state of Mississippi federally managed by the USDA Forest Service. Those Class I Areas federally managed by the USDA Forest Service within proximity include Sipsey Wilderness in Alabama, Cohutta Wilderness in Georgia, and both Caney Creek Wilderness and Upper Buffalo Wilderness in Arkansas. The Regional Haze Rule requires each state to develop a long-term strategy that includes the control measures necessary to make reasonable progress at each Class I Area outside the state that may be affected by emissions from the state.<sup>1</sup> The USDA Forest Service greatly appreciates that the DEQ assessed potential Mississippi-originating impacts on USDA Forest Service Class I Areas outside the state.

#### **Reasonable Progress Analysis**

DEQ selected Mississippi Power Company - Plant Victor J Daniel and Chevron Products Company - Pascagoula Refinery for reasonable progress analyses. DEQ further elected not to conduct an FFA for the facilities and instead opted to demonstrate they are effectively controlled for SO<sub>2</sub>. Specific to Plant Victor J Daniel, DEQ states Mississippi Power Company intends to retire one of two coal-fired steam electric generators by 2027 according to the company's Integrated Resource Plan (IRP). The USDA Forest Service requests this retirement be included in the SIP and made federally enforceable. The USDA Forest Service would also like clarification regarding this retirement as the IRP indicates both Daniel Unit 1 and Daniel Unit 2, referred to collectively as "Daniel Coal", will be retired (net capability = 502 MW).

#### **Prescribed fire emissions**

Fire plays an important role in shaping the vegetation and landscape in MS. Naturally recurring fire has been a part of the landscape for thousands of years. Aggressive fire suppression, coupled with an array

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<sup>1</sup> See "Guidance on Regional Haze State Implementation Plans for the Second Implementation Period" ([https://www.epa.gov/sites/default/files/2019-08/documents/8-20-2019\\_-\\_regional\\_haze\\_guidance\\_final\\_guidance.pdf](https://www.epa.gov/sites/default/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf))

of other disturbances (e.g., logging and chestnut blight), has changed the historic composition and structure of the forests. Periodic prescribed burning and other vegetation management can recreate the ecological role of fire in a controlled manner. Fire and fuels management supports a variety of desired conditions and objectives across the forests (e.g., community protection, hazardous fuels reduction, native ecosystems restoration, historic fire regimes restoration, wildlife openings, and open woodland creation, etc.). Recent data on prescribed fire activity, especially within the USDA Forest Service, show that the number of acres burned in prescribed fires during 2011 were lower than all other recent years. For example, within the southern region of the USDA Forest Service a total of 749,080 acres were treated with prescribed fire in 2011, while the average number of acres treated annually from the years 2007-2019 was 980,422 acres. In 2021 and 2022, acres treated by prescribed fire within the USDA Forest Service southern region were well over 1 million acres each year. Furthermore, the Land Management Plans for each of the southern forests call for a cumulative total of up to 2.1 million acres per year to be treated with prescribed fire in the future. The 2017 Regional Haze Rule includes a provision to allow states to adjust the glidepath to account for prescribed fire contributions. While prescribed fire is currently a minor contributor to visibility impairment on the 20% most impaired days, the USDA Forest Service would like assurances that Mississippi DEQ will continue to recognize the important ecological role of prescribed fire.



## **Appendix G-2: MDEQ Response to FLM Comments**

## **Appendix G-3: Public Comments**

## **Appendix G-4: MDEQ Response to Public Comments**

## **Appendix G-5: Hearing Transcript**