Hello Jon,

The National Park Service (NPS) appreciates the opportunity to review the Wisconsin Department of Natural Resources’ February 2021 draft of the Wisconsin Regional Haze State Implementation Plan (SIP) for the Second Implementation Period (2018-2028). This email summarizes the consultation call we had in coordination with the other Federal Land Management agencies on March 23, 2021 as well as our review of several SIP components. As such, this email serves as documentation of NPS conclusions and recommendations resulting from formal regional haze consultation as required by 42 U.S.C. §7491(d). While Wisconsin does not contain any NPS managed Class I areas, emissions from sources in the state affect visibility at Isle Royale National Park in Michigan and Voyageurs National Park in Minnesota. We appreciate your continued involvement in the Lake Michigan Air Directors Consortium (LADCO) and commitment to reducing pollutants in the region to help improve visibility in all Class I areas.

We have two primary concerns with the current draft of the Wisconsin Regional Haze Plan:

1. The number of facilities selected for reasonable progress four-factor analysis is too low. Wisconsin used an emissions over distance (Q/d) threshold of 10 and selected two facilities for 4-factor analyses, capturing about 50% of the total state total Q/d. Based on analysis of distance to NPS Class I areas and recent emissions, revising this threshold to a Q/d of 4 would identify an additional six facilities for a total of eight (see attached spreadsheet). Selecting these eight facilities for evaluation would be more regionally consistent with the number of facilities considered by other LADCO states and would account for over 70% of total Q/d in Wisconsin. Wisconsin has not adequately demonstrated why the selection of two facilities for four-factor analyses is “reasonable,” particularly considering the inconsistency with other states in the LADCO region.

2. We disagree with Wisconsin DNR’s conclusion that no new emissions controls are warranted in this planning period. Reasonable progress goals are established through the application of the four factors (40 CFR § 51.308 d 1):
   a. costs of compliance,
   b. the time necessary for compliance,
   c. the energy and non-air quality environmental impacts of compliance, and
   d. the remaining useful life

Wisconsin DNR identified technically feasible and cost-effective control opportunities for visibility impairing SO2 and NOx emissions at both facilities that were evaluated (AM Kaukauna...
Wisconsin’s four factor analyses relied on a 2015 LADCO report—the SIP notes that Wisconsin updated the 2015 cost information based on the 2020 Chemical Engineering Plant Cost Index (CEPCI). We find that the cost information in the 2015 LADCO Report cites a previous 2005 report for much of the cost data and that LADCO already adjusted the values in the 2015 report using the CEPCI to update between 2005 and 2015. As such, this cost data is significantly outdated, and a new analysis is likely warranted.

Even so, Wisconsin finds that post-combustion controls for these sources would be reasonable based on the four statutory factors identified in the Clean Air Act. However, Wisconsin is not basing its control decisions on the results of the four factor analyses, but instead points to: emissions reductions which have occurred since Round 1, the fact that the uniform rate of progress (URP) is already being met, and the fact that SO₂ emissions are being addressed under the 2010 1-hour SO₂ National Ambient Air Quality Standards (NAAQS).

We appreciate the gains being made to reduce visibility impairing air pollution through shut-downs and other measures and recognize that Class I areas affected by Wisconsin emissions are ahead of URP goals. However, as explicitly discussed in the preamble to the 2017 final Regional Haze Rule (82 FR 380), this does not justify the decision to delay or forego reasonable controls. The URP is not a safe harbor that can be used to stall reasonable progress toward the ultimate goal of no human caused visibility impairment in Class I areas. Further, we are not compelled by the discussion of potential future emission reductions to address SO₂ NAAQS. The strategies that may be employed to meet this health standard will certainly not address NOx emissions and will most likely not benefit regional haze as much as cost-effective SO₂ controls identified through 4-factor analysis. The suggestion that they will is aspirational at best.

In conclusion, we encourage Wisconsin to adopt a lower Q/d threshold for facility selection, conduct 4-factor analyses for selected sources, and require all technically feasible and cost-effective emissions reductions identified for SO₂ and NOX through these analyses. In doing so, Wisconsin would be taking necessary and reasonable steps to advance clean air and clear views in NPS Class I areas in this planning period.

Please know that we welcome the opportunity for further dialogue with you as Wisconsin progresses to a final SIP revision. If you have any questions, do not hesitate to reach out to us. Also, feel free to let us know if you have any edits to this summary and especially if any corrections are needed.

Best,

David

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Interior Region 3: Great Lakes
Interior Region 4: Mississippi Basin
Interior Region 5: Missouri Basin

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