

# LAKE MICHIGAN AIR DIRECTORS CONSORTIUM

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December 20, 2017

David Foerter  
Ozone Transport Commission and MANE-VU  
444 N. Capital St. NW  
Washington DC 20001

Subject: MANE-VU Regional Haze Consultative Process

Dear Mr. Foerter,

LADCO appreciates the information that the MANE-VU staff and member states have presented as part of your regional haze consultative process. After a series of discussions with the states in our region, LADCO has identified technical details in your analyses that we feel warrant further consideration by MANE-VU.

LADCO submits the following comments in response to your request for technical feedback on the analyses used to support the MANE-VU regional haze consultative process.

1. LADCO disagrees with your choice of the base year inventory used for your Q/d analysis. As this inventory is not the best estimate of contemporary emissions conditions in our region, it is not appropriate for use in emissions source impact assessments pursuant to the current round of Regional Haze Rule (RHR) SIPs. While we recognize your use of the 2015 electricity generating unit (EGU) emissions data from the EPA Clean Air Markets Division (CAMD), data quality issues in the raw CAMD data<sup>1</sup> make these data unsuitable for use in air quality impact assessments. Further, the remaining inventory sectors used in the MANE-VU screening analyses do not reflect the best available estimate of emissions in the LADCO states. LADCO feels that by neglecting to use the best available emissions information in your screening analyses, MANE-VU produced impact assessments that do not accurately characterize the regional haze impacts of LADCO sources on receptors in the MANE-VU region.
2. The 2018 inventory projections used in the MANE-VU Q/d\*C contribution assessment do not reflect the best available future year projections for large point sources. Significant shifts in the energy and industrial sectors have occurred since the development of the data used in MANE-VU's analyses. The 2018 emissions data used for MANE-VU's Q/d contribution assessment do not reflect the current state of knowledge of future year emissions for sources in the LADCO region.

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<sup>1</sup> [https://www.epa.gov/ttn/chief/conference/ei20/session5/zadelman\\_pres.pdf](https://www.epa.gov/ttn/chief/conference/ei20/session5/zadelman_pres.pdf)

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Considering these comments, LADCO does not agree with the impact assessment results drawn from MANE-VU's Q/d and CALPUFF screening analyses. Given the amount of effort that would be required of the implicated agencies in our region to fully address the MANE-VU "ask," LADCO feels that it is reasonable to request that MANE-VU integrate our recommendations for data to use in your regional haze screening analyses.

LADCO respectfully recommends that MANE-VU take the following steps to improve the identification of LADCO sources to be considered in MANE-VU's long-term strategy for regional haze:

1. Use the U.S. EPA 2011 NEI, version 6.3 (modeling case 2011en)<sup>2</sup> for the non-EGU, base year emissions for states in the LADCO region.
2. Use ERTAC EGU version 2.7 for the base and future year EGU emissions for states in the LADCO region. We recommend using ERTAC EGU over the raw CAMD data for the base year because of the quality assurance and data scrubbing capabilities included in the software for improving the EGU emissions estimates.

Finally, LADCO encourages the MANE-VU states to reconsider the decision to pass on the extension of the current regional haze planning period. As the rest of the country collectively plans for the 2021 RHR SIPs, new data (see the 2016 Inventory Collaborative), more modern decision support tools, new data analysis approaches, and opportunities to collaborate will emerge that will benefit MANE-VU's pursuit of your regional haze goals.

LADCO appreciates the opportunity to provide feedback on your consultative process and we welcome further discussion with MANE-VU on our comments and recommendations.

Sincerely,



Zachariah Adelman  
LADCO Executive Director

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<sup>2</sup> <https://www.epa.gov/air-emissions-modeling/additional-updates-2011-and-2023-emissions-version-63-platform-technical>