

State of Vermont  
Department of Environmental Conservation

## AGENCY OF NATURAL RESOURCES

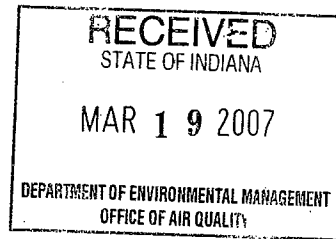
## AIR POLLUTION CONTROL DIVISION

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Dept. of Environmental Management  
Commissioner's Office



February 23, 2007

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Thomas Easterly, Commissioner  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Dear Commissioner Easterly:

This letter has two purposes. Its first purpose is to present a brief summary of results of analyses which the State of Vermont, in conjunction with the Regional Planning Organization (RPO) MANE-VU, has conducted to fulfill requirements for the protection of visibility in federally managed areas of the United States known as Class I areas (Section 169A of the Clean Air Act). The analyses indicate that sources of visibility impairing air pollutants in the State of Indiana are contributing significantly to regional haze in the Class I Lye Brook Wilderness area located in Vermont.

Its second purpose is to invite you and/or representatives from the department/agency responsible in your state for regulatory air matters, to participate in a consultation process to determine an appropriate mitigation strategy for Lye Brook Wilderness. The consultation process will develop a recommendation for the most cost-effective strategy, agreeable to all jurisdictions involved, for implementation of long-term measures and controls which demonstrate that reasonable progress goals for the Class I area, to be established in Vermont's State Implementation Plan (SIP), will be achieved.

## Background:

Environmental Protection Agency (EPA) final regional haze rules promulgated on July 1, 1999 require every state, whether containing a Class I area or not, to develop a SIP describing that state's control commitments (if any) to a long-term strategy for achieving reasonable progress goals (RPGs) in all Class I areas by 2018. 2018 is the end of the first 10 year period in a series of periodic SIP submittals that are required by the rules. The first SIPs under the regional haze rules (40 CFR 51.300) must be submitted to EPA by December 2007. Individual state plans that are developed need to be consistent with each other for them to be effective in achieving the RPGs. The regulations at 40 CFR 51.308 (d) (1) (iv) require a documented consultation process between all states involved in any multi-state strategy aimed at achieving the RPGs. This consultation record is one element required in the SIP of any state such as Vermont which contains one or more Class I areas. This letter serves to initiate the formal consultation process between our two states regarding the strategies to be incorporated in our state SIPs for submittal in December 2007.

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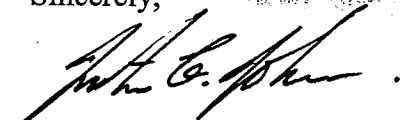
Because the development of an effective strategy for mitigation of regional haze will be regional in nature, several other states have also been invited to participate in this consultative process to develop a SIP strategy that demonstrates the RPGs for visibility will be met in Lye Brook Wilderness Area by 2018. Vermont is a member of the Regional Planning Organization MANE-VU which is comprised of the New England States and New York, New Jersey, Pennsylvania, Delaware, Maryland, and the District of Columbia. All other MANE-VU member states are being invited to consult with Vermont on our SIP strategy. In addition, a total of eleven other states outside of MANE-VU have been identified as having a level of impact on regional haze in the Lye Brook Wilderness area which is considered "significant" for this first round of regional haze SIPs with a 2018 target for RPGs. The attached Table 1 identifies all of the states with which Vermont believes it must consult during this planning period.

Table 1 summarizes the specific analytical results for each state which lead us to believe sources of haze-causing air pollutants in your state contribute significantly to the regional haze experienced at Vermont's Class I area. Over the past three years MANE-VU has conducted a number of studies and used several accepted scientific methodologies to identify the sources of impacts on visibility at all of the Class I areas in the northeast. These have been collected into a technical document entitled "Contributions to Regional Haze in the Northeast and Mid-Atlantic United States" dated August 2006 (<http://manevu.org>). This information will be available along with other technical study results during our consultative process. All MANE-VU states have determined that they will participate in each of the consultation processes for each of the MANE-VU Class I areas. In that context, if your state is a member of MANE-VU, staff from your state will already be aware of the consultation that has been ongoing internally through committees and workgroups involved in MANE-VU RPO planning efforts.

If your state is not a member of MANE-VU, you are also invited and encouraged to send a representative to future consultation meetings which will be scheduled through contacts between our respective RPOs (MANE-VU, VISTAS, MRPO). These meetings will be held over a period of months in the near future. At the meetings, establishment of the 2018 RPGs for each of the Class I areas in the northeastern U.S. will be discussed and strategies intended to achieve the RPGs will be proposed and defined. Please send us the name, address and contact phone number and/or email address of the appropriate person within your organization to contact when details of the first consultation meeting have been finalized.

The Vermont contact for this consultation process is Paul Wishinski, Air Quality Planning Chief for the Vermont Air Pollution Control Division, Phone: 802-241-3862 Fax: 802-241-2590 email: Paul.Wishinski@state.vt.us. Please contact him if you have any questions about the regional haze planning consultation process that we are formally proposing with this letter.

Sincerely,



Justin Johnson, Deputy Commissioner  
Department of Environmental Conservation  
Vermont Agency of Natural Resources

TABLE 1

**States to be Consulted on Establishing Vermont's Class I Area 2018 Reasonable Progress Goals and Strategies for Achieving Them**

<u>State Name</u>	<u>Primary Haze-Causing Significant Impact<sup>(1)</sup> and/or Other Reason for Inclusion</u>
Connecticut	MANE-VU member
Delaware	MANE-VU member
District of Columbia	MANE-VU member
Georgia	Sources impact > 2% Sulfate Contribution
Illinois	Sources impact > 2% Sulfate Contribution
Indiana	Sources impact > 2% Sulfate Contribution
Kentucky	Sources impact > 2% Sulfate Contribution
Maine	MANE-VU member
Maryland	Sources impact > 2% Sulfate Contribution
Massachusetts	Sources impact > 2% Sulfate Contribution
Michigan	Sources impact > 2% Sulfate Contribution
New Hampshire	MANE-VU member
New Jersey	MANE-VU member
New York	Sources impact > 2% Sulfate Contribution
North Carolina	Sources impact > 2% Sulfate Contribution
Ohio	Sources impact > 2% Sulfate Contribution
Pennsylvania	Sources impact > 2% Sulfate Contribution
Rhode Island	MANE-VU member
Tennessee	Sources impact > 2% Sulfate Contribution
Virginia	Sources impact > 2% Sulfate Contribution
West Virginia	Sources impact > 2% Sulfate Contribution
Wisconsin	Sources impact > 2% Sulfate Contribution

<sup>(1)</sup> From the report entitled "Contributions to Regional Haze in the Northeast and Mid-Atlantic United States", prepared by NESCAUM for the Mid-Atlantic / Northeast Visibility Union (MANE-VU), August 2006. The primary criteria Vermont used to identify a state as having a significant impact on Vermont's Class I area was the modeled base-year 2002 state-wide sulfur oxide emission impacts on the ambient sulfate levels predicted at receptors in the Class I area. Any state with a modeled annual average sulfate ion impact greater than 2% of all modeled sulfate ion impacts was considered to have "significant impacts" for purposes of consultation on long-term strategies and reasonable progress goals.

