



United States Department of the Interior

NATIONAL PARK SERVICE

601 Riverfront Drive
Omaha, NE 68102

1.A.2 (MWR-NRSS)

October 3, 2022

Mr. Hassan Bouchareb
Minnesota Pollution Control Agency
c/o Maggie Wenger
520 Lafayette Road
St. Paul, Minnesota 55155
[Via MPCA Web Site Comment Form](#)

Re: Comments on Minnesota's proposed Regional Haze State Implementation Plan for the Second Implementation Period

Dear Mr. Bouchareb:

Thank you for the opportunity to provide comments on the proposed Minnesota Regional Haze State Implementation Plan (SIP) for the Second Implementation Period (2018–2028). National Park Service (NPS) staff consulted with the Minnesota Pollution Control Agency (MPCA) regarding SIP development on June 30, 2022 and provided written comments by email on July 11, 2022. We appreciate your consideration of our feedback and responses to our suggestions. We note that the public notice announcing the availability of the draft SIP did not include a summary of the conclusions and recommendations of the Federal Land Managers as required by statute (42 U.S.C. §7491).

Overall, the Minnesota draft regional haze SIP is one of the most technically sound and complete plans that the NPS has reviewed in this planning period. However, in some cases, NPS disagrees with the conclusions reached by MPCA. We continue to encourage Minnesota to seriously evaluate additional emission controls for the state's taconite facilities. Minnesota taconite facilities emit over 35,000 tons annually of visibility-impairing emissions and are relatively close to Voyageurs and Isle Royale National Parks. Based on an analysis of emissions relative to distance to NPS Class I areas, Minnesota ranked 9th in visibility impairing emissions within the U.S., with the taconite facilities comprising more than half of those impacts. As our analysis in the attached technical document demonstrates, there are more effective controls available that may be technically feasible and cost-effective.

In addition, the NPS finds that emission controls may be cost effective for American Crystal Sugar (ACS) Crookston, ACS East Grand Forks, Southern Minnesota Beet Sugar Cooperative,

and for Power Boiler 9 at the Sappi Cloquet paper mill. Based on the public comment version of MPCA's SIP, we have revised some of our technical analyses, as reflected in the attachments to this letter. Specifically, the NPS has adjusted cost estimates based on the parameters used by MPCA in the latest draft of the SIP. Our revised analyses indicate that additional controls may be available at these facilities within the \$7,600/ton cost threshold established by MPCA. The NPS recommends that cost-effective emission controls that achieve the greatest level of reductions be required for these facilities. We also continue to encourage Minnesota to evaluate additional controls for Boise White Paper.

The NPS manages 48 of the 156 mandatory Class I areas across the country where visibility is an important attribute. Minnesota contains one NPS-managed Class I area, Voyageurs National Park, and emissions from sources in the state can also affect visibility at nearby Isle Royale National Park in Michigan. We encourage Minnesota to take advantage of the opportunity this SIP provides to obtain further emission reductions. Applying the reasonable controls available to MPCA would make a difference for clear views in these parks and across the region.

We appreciate the opportunity to comment and look forward to continuing to work with Minnesota to improve and protect air quality and visibility in these Class I areas. If you have questions, don't hesitate to contact me or David Pohlman, Regional Air Resources Coordinator at 651-491-3497, david_pohlman@nps.gov.

Sincerely,

Herbert C. Frost, Ph.D., Regional Director,
National Park Service, Interior Region 3, 4, 5.

Attachments:

NPS-MN-RH-Tech-Comms.docx

NPS-MN-RH-Workbooks.zip

cc:

Nancy Finley, Associate Regional Director, Interior Regions 3, 4, 5

David Pohlman, Air Resources Specialist, Interior Regions 3, 4, 5

Bob DeGross, Superintendent, Voyageurs National Park

Denice Swanke, Superintendent, Isle Royale National Park

Melanie Peters, Regional Haze Lead, NPS Air Resources Division

Kirsten King, Lead, NPS Air Resources Division