



REGION 1

BOSTON, MA 02109

May 30, 2024

Ellen E. Parr Doering
Air Toxics Manager
Department of Environmental Conservation, Agency of Natural Resources
Air Quality and Climate Division
One National Life Drive
Montpelier, VT 05620

VIA EMAIL Ellen.ParrDoering@vermont.gov

RE: Proposed VT Regional Haze State Implementation Plan Periodic Comprehensive Revision

Dear Ms. Doering:

On April 11, 2024, the Vermont Department of Environmental Conservation (DEC) proposed the Vermont Regional Haze Plan for the Second Implementation Period (2018-2028) for public comment. We have reviewed the proposal and are including comments in the enclosure.

EPA notes that in August 2022, EPA published a Finding of Failure to Submit Regional Haze State Implementation Plans for the Second Planning Period that covers Vermont and 14 other states. See 87 FR 52856 (Aug. 30, 2022). This finding started a two-year clock for promulgation of a Federal Implementation Plan (FIP) by EPA, in accordance with CAA § 110(c)(1), unless Vermont submits, and EPA approves, a SIP submittal to meet the requirements of the Regional Haze Rule and CAA §§ 169A and 169B prior to September 29, 2024. Therefore, we encourage Vermont to submit its SIP revision to EPA as expediently as possible.

EPA appreciates the efforts of the Vermont DEC for the development of this Regional Haze plan, and we look forward to your forthcoming SIP submittal. If you have any further questions, please contact Ayla Martinelli at (617) 918-1057.

Sincerely,

Eric Wortman, Acting Manager
Air Quality Branch

Enclosure

**EPA COMMENTS FOR VERMONT PROPOSED
REGIONAL HAZE STATE IMPLEMENTATION PLAN**

Pg. 51-75 – Progress Report

Vermont’s Draft Regional Haze Plan still does not fully address 40 CFR § 51.308(g)(3)(iii). Specifically, this regulatory provision requires the State to assess “[t]he change in visibility impairment for the most impaired and least impaired days over the period since the period addressed in” the last progress report. 40 CFR § 51.308(g)(3)(iii)(A). Vermont’s last progress report addressed visibility conditions for the period 2010-2014. See 82 FR 38834, 38836. Thus, Vermont’s Regional Haze Plan for the second planning period should assess the numeric change in visibility for the most and least impaired days between 2010-2014 and 2015-2019. *See, e.g.*, 82 FR at 38836 (Table 1). The calculation is as follows:

Most Impaired Days:

(visibility in 2010-2014) – (visibility in 2015-2019) = change in visibility

Example: 18.5 dv – 14.06 dv = 4.44 dv

Least Impaired Days:

(visibility in 2010-2014) – (visibility in 2015-2019) = change in visibility

5.1 dv – 4.88 dv = 0.22 dv