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NORTH CAROLINA
Environmental Quality

April 4, 2022

Daniel Blackman, Regional Administrator
USEPA, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Subject: Final Regional Haze State Implementation Plan (SIP) for North Carolina Class I Federal Areas for Second Planning Period (2019 – 2028)

Dear Mr. Blackman:

I am pleased to submit the final *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)*. Enclosed is the complete SIP package uploaded into the United States Environmental Protection Agency's (EPA) State Planning Electronic Collaboration System (SPeCS) for SIPs interface for your staff to review.

This final SIP was prepared in accordance with the Federal Regional Haze Rule (RHR) provisions specified in 40 CFR 51.308(f) and the EPA's guidance for implementing the rule to comply with Section 169 of the Clean Air Act, as amended in 1990. This SIP also contains the second five-year progress report covering the period 2010 through 2018 as required in 40 CFR 51.308(g)(1) through (5) of the RHR.

The final SIP represents commitments and enforceable actions taken by the North Carolina Department of Environmental Quality (DEQ), Division of Air Quality (DAQ) to address the requirements of the RHR. Pursuant to 40 CFR 51.308(f), North Carolina's final SIP includes the following elements:

- Calculations of baseline, current, and natural visibility conditions; progress to date; and the uniform rate of progress for each Class I area;
- Documentation of the technical analysis on which North Carolina is relying to determine reasonable progress, including modeling, emissions, and data analysis;
- Source-specific reasonable progress assessment/four-factor analyses and documentation of the source selection process;
- Long-term strategy for regional haze resulting from the reasonable progress analyses;
- Reasonable progress goals;
- Monitoring strategy and other implementation plan requirements;
- Documentation of consultation with other states, EPA, and Federal Land Managers (FLMs); and
- Documentation of the public comment process.

In Section 7.8.3 of the final SIP, the DAQ is proposing to incorporate into the regulatory portion of North Carolina's SIP at 40 CFR 52.1770, table (d), certain source-specific sulfur dioxide (SO₂) emission limits



North Carolina Department of Environmental Quality | Division of Air Quality

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and associated monitoring, recordkeeping, and reporting requirements resulting from the reasonable progress assessment/four-factor analyses for the No. 2 Hog Fuel Boiler at Domtar Paper Company, and Sulfuric Acid Plant No. 5, No. 6, and No. 7 at the PCS Phosphate Company. The source-specific SO₂ emission limits and associated requirements are based on the requirements in Permit 04291T50 for the Domtar Paper Company and Permit 04176T66 for the PCS Phosphate Company. While not requesting that EPA include the *entire* copy of each permit in the final SIP, a copy of these permits is included in Appendix G for reference only to support the “Materials to be Incorporated into the SIP” in Section 7.8.3 of the SIP.

The final SIP also includes Appendices A through I. Appendices A through E include technical support materials and documentation used in developing the SIP. Appendix F includes the documentation of the interagency consultation process. Appendix G includes documentation of the source-specific reasonable progress assessment/four-factor analyses conducted. Appendix H documents the 60-day FLM consultation process, comments provided by the FLMs, and responses to the comments. Appendix I documents the public comment and hearing process, comments received, and responses to the comments.

The final SIP includes the full Table of Appendices that provides descriptions and file names for each appendix and sub-appendix and indicates which are North Carolina-specific and which are related to work completed through the Visibility Improvement – State and Tribal Association of the Southeast (VISTAS) regional planning organization. The North Carolina-specific appendices are:

- Appendix B-3: North Carolina Point Sources Emissions Projections for 2028
- Appendix F-1: North Carolina Consultation Letters to VISTAS States
- Appendix F-4: North Carolina Consultation with Mid-Atlantic/Northeast Visibility Union (MANE-VU)
- Appendix G-1: Reasonable Progress Assessment for Blue Ridge Paper Products, LLC–Canton, NC
- Appendix G-2: Reasonable Progress Assessment for Domtar Paper Company, LLC–Plymouth, NC
- Appendix G-3: Reasonable Progress Assessment for PCS Phosphate Company, Inc.–Aurora, NC
- Appendix H: Federal Land Manager Consultation, Comments, and Responses
- Appendix I: Public Notice, Hearing Report, Comments Received, and Responses to Comments

The DAQ issued a public notice announcement, in accordance with 40 CFR 51.102, indicating that the pre-hearing draft of the *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)*, was available for public comment and posted on the DAQ website for review. The public comment period was open from Monday, August 30, 2021, through Friday, October 15, 2021. The public notice announcement indicated that a public hearing would be held on Wednesday, October 6 at 6:00 pm EDT. In order to address current guidance to help minimize the spread of COVID-19, the notice indicated that the public hearing would be held digitally via Cisco’s WebEx teleconferencing service.

In addition to posting on the website, the public notice announcement was sent to a number of email distribution lists managed by the DAQ, which included numerous stakeholders from industry and environmental groups. The DAQ has found that sending the public notice announcements to these groups is more effective than publishing the notices in a few local newspapers and is consistent with the requirements described in the April 6, 2011, memorandum, “*Regional Consistency for the Administrative Requirements of the State Implementation Plan Submittals and the Use of Letter Notices.*” Environmental Justice analyses were also conducted by the DEQ’s Environmental Justice team to inform outreach regarding the public comment period and public hearing.

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Upon making an appointment consistent with the DEQ's policy during the COVID-19 pandemic, the pre-hearing draft SIP was also made available for in person review during normal business hours at the DAQ Central Office in Raleigh and the DAQ Regional Offices in Asheville and Washington.

I thank you and your staff for working with the DAQ in developing this SIP. I look forward to EPA's review and final approval of the final *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)*.

If you should have any questions, please contact Randy Strait of my staff at (919) 707-8721 or randy.strait@ncdenr.gov.

Sincerely,

A handwritten signature in blue ink, reading "Michael A. Abraczinskas". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michael A. Abraczinskas, Director
Division of Air Quality

MAA/rps

Enclosures

cc: Mr. Randy Strait, NCDAQ
Ms. Tammy Manning, NCDAQ
Ms. Leslie Rhodes, Mecklenburg County Air Quality
Ms. Ashley Featherstone, Asheville-Buncombe Air Quality Agency
Mr. Minor Barnette, Forsyth County Office of Environmental Assistance and Protection
Ms. Caroline Freeman, USEPA
Mr. Evan Adams, USEPA
Ms. Lynorae Benjamin, USEPA
Ms. Michele Notarianni, USEPA
Ms. Joel Huey, USEPA

