

Appendix I

**Public Comment Process, Comments
Received, and Responses to Comments**

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Table of Contents

Table of Contents	3
1.0 Overview	5
1.1. Public Notice	5
1.2. Guide to Comments and Responses	6
1.2.1. Public Hearing - Index to Verbal Comments Received and Responses	6
1.2.2. Public Comment Period - Index to Written Comments Received and Responses ...	7
2.0 Report of Public Hearing Proceedings.....	16
2.1. Introduction	16
2.2. Hearing Officer Comments at Hearing	16
2.3. Staff Presentation (slides).....	20
2.4. Public Comments (from transcript).....	21
3.0 Summary of Responses to EPA, NPS, MANE-VU, New Jersey, Public and Industry Comments	29
3.1. Responses to EPA Comments	29
3.1.1. Key Comments.....	29
3.1.2. General Comments.....	30
3.2. Responses to NPS Comments	30
3.3. Responses to Comments from MANE-VU and New Jersey.....	32
3.4. Summary of and Responses to Public Comments.....	32
3.4.1. Source Selection Methodology.....	32
3.4.2. Glidepaths for Class I Areas	35
3.4.3. Exclusion of NO _x /Nitrate/PM	37
3.4.4. Four-Factor Analyses.....	38
3.4.5. PSAT Modeling	41
3.4.6. Additional reductions for NO _x /Nitrate/PM.....	43
3.4.7. Enforceable Emissions Reduction Measures	44
3.4.8. Environmental Justice (EJ)	44
3.4.9. State Consultation	45
3.4.10. Planning Process	46
3.4.11. Non-Wood Heating Options.....	47
3.5. Summary of and Responses to Comments from Industry.....	48
3.5.1. Duke Energy	48
3.5.2. Domtar Paper Company.....	48

3.5.3.	Blue Ridge Paper Products	49
4.0	Written Comments Received During Comment Period.....	50
4.1.	Individual Comments	50
4.2.	Effectively Equivalent Comments from Individuals, Form Letter 1	51
4.3.	Effectively Equivalent Comments from Individuals, Form Letter 2	51
4.4.	Effectively Equivalent Comments from Individuals, Mailed Postcards	59

1.0 Overview

This appendix documents the public comment and hearing process, comments received, and responses to comments regarding 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)*. The draft SIP was released to the public for a 45-day comment period from Monday, August 30, 2021, through Friday, October 15, 2021. A public hearing was held digitally via Cisco’s WebEx teleconferencing service on Wednesday, October 6 starting at 6:05 pm EDT. The public hearing was held digitally to address North Carolina Office of State Human Resources guidance to help minimize the spread of COVID-19 at the time of the hearing. During the public comment period, the DAQ received 213 pages of written comments from 19 federal and state, non-governmental, and industry organizations; 7 pages from individuals submitted via email; 351 pages of effectively equivalent “form letter” comments submitted by individuals via email, and 77 effectively equivalent post cards submitted by individuals through the National Parks Conservation Association (NPCA). Several of the comments received via form letters and post cards were received from the same individuals.

During the public hearing seven members of the public spoke and their comments were recorded and documented in a summary of the public hearing. The DAQ reviewed and has prepared responses to every comment received.

Section 1.1 provides the public notice and Section 1.2 provides a guide to comments and responses in tabular format.

1.1. Public Notice

1.2. Guide to Comments and Responses

Sections 1.2.1 and 1.2.2 provide a table of cross-references to indicate where the response to each verbal and written comment, respectively, can be found.

1.2.1. Public Hearing - Index to Verbal Comments Received and Responses

Table I-1. Comments from Individual Citizens - Verbal

Comment	Response Cross-Reference
<i>Ulla Reeves (also submitted written comments)</i>	
Seconds EPA/NPS Park Service Comments	See Sections 3.1 and 3.2
NC Should have reviewed its impact on any C1A, not just C1As in NC	See Section 3.5.2
EPA memo says that states must secure additional emission reductions that build on progress already achieved. Expectation that reductions be additive to ongoing and upcoming plans, yet DAQ concludes that no new reductions are warranted.	See Section 3.4.4
Source selection insufficient	See Section 3.4.1
Exclusion of Duke Energy plants	See Sections 3.4.1, 3.4.2, and 3.4.4
Omission of NO _x	See Section 3.4.4
It is inappropriate for DAQ to rely on the glidepath	See Section 3.4.4
Make retirements enforceable	See Section 3.4.5
Does not adequately address environmental justice	See Section 3.4.6
<i>Will Harlan</i>	
Omission of NO _x	See Section 3.4.4
Exclusion of Duke Energy coal plants	See Sections 3.4.1, 3.4.2, and 3.4.4
No additional controls required, relying solely on glidepath.	See Section 3.4.4
Does not adequately address environmental justice	See Section 3.4.6
Misrepresented concerns expressed by NPS (outdated modeling data, lack of NO _x , lack of power plants).	See Section 3.2
<i>Leslie Griffith</i>	
Only selected 3 sources for 4FA	See Section 3.4.2
Exclusion of Duke Energy coal plants	See Sections 3.4.1, 3.4.2, and 3.4.4
Make projected emissions enforceable via SIP	See Section 3.4.5
Omission of NO _x	See Section 3.4.4
Does not adequately address environmental justice	See Section 3.4.6
<i>Krista Early</i>	
Require reductions from coal-fired power plants	See Sections 3.4.2 and 3.4.4
Exclusion of Duke Energy coal plants	See Sections 3.4.1, 3.4.2, and 3.4.4
Seconds the NPCA comments	See Section 3.5.2
Omission of NO _x	See Section 3.4.4
Does not adequately address environmental justice	See Section 3.4.6
<i>Rachel Woods</i>	

Comment	Response Cross-Reference
Include enforceable emission reductions	See Section 3.2, response 7
Omission of NO _x	See Section 3.4.4
Expand updated regulations to all 28 haze-creating pollutants (insufficient source selection)	See Section 3.4.1
<i>Marianne Ostebrink</i>	
Exclusion of Duke Energy coal plants	See Sections 3.4.1, 3.4.2, and 3.4.4
Omission of NO _x	See Section 3.4.4
<i>Howard Gebhart (also submitted written comments)</i>	
Insufficient source selection	See Section 3.4.1
Modeling approach relied too much on PSAT for evaluation of visibility impairment; Greater reliance should have been placed on AOI.	See Section 3.4.3
SIP fails to require emissions controls at facilities that were evaluated.	See Section 3.4.4
Without enforceable controls, 2028 limits cannot be assured, include enforceable emissions reductions	See Section 3.4.5

1.2.2. Public Comment Period - Index to Written Comments Received and Responses

Table I-2-1. Summary of EPA Comments and Responses

Comment	Response Cross-Reference
Key Comments	
Permit Conditions for PCS Phosphate and Domtar are under further evaluation, EPA will provide comments and work with the state to address those comments.	See Section 3.1.1
Once interstate consultations regarding four-factor analyses requested for specific sources affecting NC's Class I areas have concluded, please document the outcomes pursuant to 40 CFR 51.308(f)(2)(ii), including whether the state agrees, if there were any disagreements, and any steps taken to resolve disagreements.	See Section 3.1.1
Please add a clarifying statement in the discussion related to Table 7-14 identifying the Class I areas that the State believes it is reasonably anticipated to contribute to and whether the State consulted with the states with those Class I areas.	See Section 3.1.1

Comment	Response Cross-Reference
General Comments	
<p>Reasonable Progress Goals (RPGs): The 2028 RPGs for the clearest days at North Carolina’s Class I areas are higher than current visibility conditions during the 20 percent clearest days (see “Table Ex-1-3”, p.v). Consider referencing the 2028 clearest days numbers in the EPA visibility modeling and explaining why the 2028 clearest days RPG is biased high</p>	<p>See Section 3.1.2</p>
<p>The EPA suggests augmenting the basis for the State’s conclusion on page 299 that adding a wet scrubber on Domtar’s Hog Fuel Boiler 2 is not cost effective.</p>	<p>See Section 3.1.2</p>
<p>Please clarify in section 7.8.1.2. that the visibility benefits modeling for the wet scrubber option related to the Domtar Hog Fuel Boiler 2 four-factor analysis is supplementary information and is not being relied upon by the State for its conclusions as noted in section 7.8.2.2.</p>	<p>See Section 3.1.2</p>
Other Comments	
<p>Section 1.6: Consider cross-referencing or reiterating in Section 1.6 the State’s procedures for continuing consultation between the State and the Federal Land Managers pursuant to 40 CFR 51.308(i)(4) described in Section 11 on page 356.</p>	<p>Comment is acknowledged</p>
<p>Table 7-56: Consider augmenting the title of Table 7-56 on page 293 to include emissions rates.</p>	<p>Comment is acknowledged</p>
<p>Section 7.10: Consider updating the narrative regarding sections 7.8.3 and 7.10.</p>	<p>Comment is acknowledged</p>
<p>Section 7.8.1.2: All table references starting Section 7.8.1.2 appear to be one number off (</p>	<p>Comment is acknowledged</p>
<p>Section 7.8.1.2, page 293: Consider capitalizing the “n” in No. 2 fuel oil in the paragraph under “Control Technology Evaluation.”</p>	<p>Comment is acknowledged</p>
<p>The EPA suggests clarifying the wording in Section 10.3 on page 329 with respect to the “Permanent and Enforceable” subsection.</p>	<p>Comment is acknowledged</p>

Table I-2-2. Summary of NPS Comments and Responses

Comment	Response Cross-Reference
NCDEQ implement cost-effective nitrogen oxide emission reduction opportunities in this round of regional haze planning and not defer these reductions into the third planning period. As acknowledged by NCDEQ in their monitoring data review, ammonium nitrate is an increasingly important component of anthropogenic haze on the 20% most impaired days.	See Section 3.2
NCDEQ evaluate opportunities to optimize both NO _x and SO ₂ pollution control efficiency from the Duke Energy facilities identified by the NPS.	See Sections 3.4.1 and 3.4.3

Table I-2-3. Summary of Comments from MANE-VU and New Jersey

Comment	Response Cross-Reference
<i>MANE-VU</i>	
MANE-VU is appeased by NO _x /SO ₂ continuous controls at GG Allen.	Comment is acknowledged
Performing a 4FA for emissions w/ 3.0+Mm ⁻¹ impact at MANE-VU Class I areas is not applicable to NC, all impacts < 3.0Mm ⁻¹	Comment is acknowledged
MANE-VU recognizes the efforts that North Carolina has made in the area of renewable energy and energy efficiency as described in Section 7.2.7.1 of the pre-hearing draft.	Comment is acknowledged
Ask #1: EGUs >= 25 MW w/ controls, ensure controls are run year round.	See Appendix F-4a
Ask #2: Perform a 4FA for emissions w/ 3.0+Mm ⁻¹ impact at MANE-VU Class I areas	See Appendix F-4a
Ask #3: Ultra-low sulfur fuel oil standard	See Appendix F-4a
Ask #4: EGUs and other large sources, pursue enforceable mechanisms to lock in lower emission rates.	See Appendix F-4a
Ask #5: Efficient energy and clean technologies	See Appendix F-4a
<i>New Jersey</i>	
Concurs with the comments that are being submitted by MANE-VU. North Carolina must ensure that it addresses the enforceable measures necessary for reasonable progress. Reiterates the MANE-VU “asks”	See Appendix F-4b

Table I-2-4. Summary of NPCA et al Comments and Responses

Comment	Response Cross-Reference
Significant Flaws in VISTAS Regional Haze CAMx modeling and methods – flawed modeling input and source selection methodology.	See Section 3.4.1
DAQ Unreasonably Excluded Sources	See Section 3.4.1
DAQ wrongly exempted Duke facilities from 4FA Requirement and should have required controls for NO _x and SO ₂	See Sections 3.4.1 and 3.4.3
DAQ's Reliance on the Glide Path violates the CAA and RHR.	See Section 3.4.2
DAQ improperly refuses to require emission reductions based on purported emission reductions from existing CAA programs	See Section 3.4.6
DAQ must reconsider and adapt its SIP to address comments from FLMS	See Section 3.2
DAQ's analyses are inconsistent with Clean Air Act and Regional Haze Rule	See Section 3.4.10
DAQ's State to State Consultation Process is inadequate – failed to consult with Ohio and Pennsylvania.	See Section 3.4.9
<p>Even for sources selected for 4FA, DAQ's SIP falls short:</p> <p>BRPP: Require NO_x 4FA, Confirm 2028 projections, investigate additional controls, confirm/correct DSI cost analysis.</p> <p>Domtar: Revisit SO₂ control assumption for No 2. Hog Boiler, require NO_x 4FA, Wet Scrubber on No. 2 Hog Boiler, increase wet scrubber efficiency, incorrect charges in cost analysis.</p> <p>PCS Phosphate: Should not assume unsecured SO₂ reductions.</p>	See Section 3.4.3
Proposed SIP does not contain new provisions to ensure that emission limitations are permanent, enforceable and apply at all times	See Section 3.4.7
DAQ Should Analyze the Environmental Justice Impacts of its Regional Haze SIP, and Should Ensure the SIP Will Reduce Emissions and Minimize Harms to Disproportionately Impacted Communities.	See Section 3.4.8

Comment	Response Cross-Reference
<i>Additional Comments from Kordzi Report – Significant Flaws</i>	
The SIP only addresses visibility impairment from sulfate. Although sulfate does indeed dominate visibility impairment at all of North Carolina’s Class I Areas, nitrate also contributes and a number of likely cost-effective NO _x controls are available and should have been examined.	See Section 3.4.6
North Carolina wrongly uses the visibility progress achieved at its Class I Areas as a safe harbor against additional cost-effective controls.	See Section 3.4.2
North Carolina’s source selection process is flawed, as it resulted in few sources to examine for four-factor analyses. Much of this is due to the SIP’s selection threshold and its exclusive reliance on Particulate Source Apportionment Technology (PSAT).	See Sections 3.4.3 and 3.4.5
North Carolina bases its modeling and control cost analyses on 2028 emission projections. In some cases, these emissions projections are much less than historical and current source emissions. In these cases, either more current emissions should have been used, or these assumed reductions should have been secured by enforceable commitments that were made a part of the SIP.	See Section 3.4.1
North Carolina ignored likely cost-effective controls, mainly in the form of upgrades to Selective Catalytic Reduction (SCR) and scrubber systems at Electricity Generating Units (EGUs) located in North Carolina, and via the consultation process, in other states.	See Section 3.4.1
The SIP suffers from a general lack of documentation, especially in its control cost analyses.	See Section 3.4.3
<i>Additional Comments from Kordzi Report – Errata</i>	
Internal table and figure reference in error	
Figures 1-2 and 1-3 do not include JOYC without a note that GRSM monitor data is used for JOYC	Comment is acknowledged

Comment	Response Cross-Reference
<p>On page 231, NC DEQ states, “The NCDAQ reviewed the 37 facilities identified in Table 7-19 through Table 7-23 with an AoI contribution of $\geq 1\%$ for sulfate and nitrate combined for one or more of the Class I areas in North Carolina.” The intended table citation appears to be Tables 7-20 to 7-24, inclusive. Also, it appears there are 69 facilities with an Area of Influence (AoI) contribution of $\geq 1\%$ for sulfate and nitrate combined for one or more of the Class I areas in North Carolina.</p>	<p>Comment is acknowledged</p>
<p>In Table 7-31, it appears that the “Final Revised EGU+NEG (Mm-1)” column is presented twice and all cells have the same value of 13.2255 Mm-1. Similar issues exist in Tables 7-32 through 7-35.</p>	<p>Comment is acknowledged</p>
<p>On page 266, it appears that the last sentence in the next to the last paragraph should read, “Of this total point source facility impact, the seven (7) facilities have a sulfate contribution $\geq 1.00\%$ and account for 11.3% of the point source sulfate plus nitrate visibility impact in 2028.” Sentences in successive paragraphs should similarly be revised, table references should be revised, and the number of facilities with an impact of at least 1% at Joyce Kilmer-Slickrock Wilderness Area should be “8”.</p>	<p>Comment is acknowledged</p>

Table I-2-5. Summary of Public Comments and Responses

Comment	Response Cross-Reference
Comments From Individual Conservation Organizations	
<i>Appalachian Trail Conservancy</i>	
Concerns about omission of NO _x	See Section 3.4.1 and 3.4.6
Concerns about exclusion of some industrial facilities	See Section 3.4.1
Seconds NPS comments	See Section 3.2
<i>North Carolina Conservation Network</i>	
Concerns about omission of NO _x & PM	See Section 3.4.6
Concerns about exclusion of Duke coal facilities	See Sections 3.4.1, 3.4.3
Unique Comments From Individual Citizens - Written	
<i>Andrew Whelan</i>	
The SIP excludes dozens of large polluters	See Section 3.4.1

Comment	Response Cross-Reference
Fails to consider NO _x	See Section 3.4.1 and 3.4.6
No coal plants were selected to reduce emissions	See Section 3.4.1
<i>Lynn Gaudette</i>	
More controls needed for Duke facilities and paper mills	See Sections 3.4.1, and 3.4.3
<i>Nancy Bryant</i>	
Address air pollution, get this program "off the ground and into the air"	See Section 3.4.10
<i>Katherine Marx</i>	
Please figure out how a much colder state such as MN is able to supply much more affordable heating options (not wood!) to their population, and see about bringing those options to NC. Or much better yet, invest in newer technologies that truly are not contributing to air pollution.	See Section 3.4.11
<i>Alexandra Mabel</i>	
North Carolina should expand the list of selected pollution sources and consider more pollutants in its analysis for the Regional Haze Plan.	See Section 3.4.1
Don't exclude NO _x	See Section 3.4.1 and 3.4.6
<i>Beth Hansen</i>	
It is unclear why coal-fired power plants were not evaluated	See Section 3.4.1
Make retirements Enforceable	
Plan does not adequately express omission of NO _x	See Section 3.4.1 and 3.4.6
Look at paper mills and PCS Phosphate for reductions	See Section 3.4.1
<i>Gloria Shen</i>	
The state's Regional Haze Program must include planning processes that are rigorous in protecting everyone and everything in this state	See Section 3.4.9
There must be action taken by the state to hold those industries and entities accountable for significantly diminished air quality in North Carolina.	See Section 3.4.10
Effectively Equivalent Comments From Form Letters (2) and Postcard Campaign	
NC has not adequately analyzed NO _x or PM	See Section 3.4.6

Comment	Response Cross-Reference
NC hasn't considered evaluating Duke coal facilities	See Sections 3.4.1, 3.4.3
Does not require any new pollution reductions for the reviewed facilities	See Section 3.4.1
Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable when new, cost-effective upgrades could deliver important clean air gains.	See Section 3.4.1

Table I-2-6. Summary of Comments from Industry

Comment	Response Cross-Reference
<i>Duke Energy</i>	
The Scope of State Discretion Under the Regional Haze Program Supports DEQ's Draft SIP.	See Section 3.5.1
The State's Screening Threshold Was Reasonable	See Section 3.5.1
North Carolina Has Appropriately Considered Visibility in Deciding Not to Evaluate Duke Energy Facilities for Reasonable Progress Controls.	See Section 3.5.1
The State Has Authority to Focus on Sulfate as the Primary Pollutant of Concern.	See Section 3.5.1
Current Controls for the Duke Energy Facilities Are Sufficiently Stringent that No Additional Controls Are Reasonable.	See Section 3.5.1
It Is Appropriate for the State to Consider and Rely on Other Factors When Screening Out Sources from Four-Factor Review.	See Section 3.5.1
<i>Domtar</i>	
Concurs with DAQ's conclusions that the control measures currently in place on the no. 1 Hog Fuel Boiler are not necessary for reasonable further progress.	See Section 3.5.2
Also concurs that no cost-effective measures are available for the No. 2 Hog Fuel Boiler.	See Section 3.5.2
Interest rate incorrectly listed as 3.75%.	See Section 3.5.2
Clarification of language intended for the SIP – request clarification on how permit 04291T49 will be linked to the conditions in the SIP	See Section 3.5.2

Comment	Response Cross-Reference
Process to request permit revisions. Request clarification that future revisions to MMR requirements added to SIP are not impeded and permits can be requested as needed	See Section 3.5.2
Table References: Several tables in 7.8.1.2 are misnumbered.	Comment is acknowledged
Averaging periods: Request that any demonstration of compliance needed in the future for regional haze that it be no shorter than a 30 day averaging period.	See Section 3.5.2
<i>Blue Ridge Paper Products</i>	
Supports the determination that existing controls demonstrate reasonable progress	See Section 3.5.3
Supports the conclusion that BRPP obligations in the source-specific SIP are sufficient	See Section 3.5.3

2.0 Report of Public Hearing Proceedings

2.1. Introduction

On October 6, 2021, the DAQ held a virtual Public Hearing, which began at approximately 6:05 PM. The Public Hearing was held through the WebEx online platform. Additionally, a dedicated telephone number was provided to enable citizens to call in to the hearing and make comments if they had either no internet access or a poor internet connection. During the Hearing, Mr. Randy Strait, Planning Section Chief of the DAQ Raleigh Central Office, gave a presentation of the draft Regional Haze SIP. The Hearing Officer for the Public Hearing was Mrs. Joelle Burluson, Senior Regulatory Advisor for the DAQ's. Citizens were allowed to make comments during the Public Hearing but were not permitted to ask questions of either the Hearing Officer, or Mr. Strait. During the Public Hearing, citizens were allowed up to 5 minutes to speak. Of the citizens who were signed up to speak, 5 of them did speak, while another 2 citizens who had not signed up to speak were allowed to speak at the Hearing.

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 public notice was also posted on the North Carolina Division of Air Quality website at least 30 days prior to the public hearing.

2.2. Hearing Officer Comments at Hearing

Below is a transcription of the comments the Hearing Officer made at the virtual Public Hearing.

Good evening. It is now 6:05 p.m. on Wednesday October 6, 2021. Thank you for your interest and your attendance in this virtual public hearing tonight. The hearing is now considered open.

My name is Joelle Burluson, I am the Senior Regulatory Advisor at the N.C. Division of Air Quality's Raleigh Central Office. I have been appointed to be the hearing officer for this public hearing by the Director of the Division of Air Quality, Mike Abraczinskas. My purpose this evening is to receive your comments, either written or oral, for consideration in the issuance of the draft of the Regional Haze State Implementation Plan, or "SIP", for North Carolina Class I Areas for the Second Planning Period (2019-2028). This pre-hearing draft SIP was prepared in accordance with the Federal Regional Haze Rule provisions specified in 40 CFR 51.308(f) and the U.S. Environmental Protection Agency'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) of the Regional Haze Rule.

North Carolina's Class I Federal areas (see 40 CFR 81.422) include the Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area, and Swanquarter Wilderness Area. The

focus of this hearing, and the only focus, is to receive public comments on the draft Regional Haze SIP.

The Division of Air Quality is conducting this public hearing digitally to allow for public participation while protecting public health under current guidance to prevent the spread of COVID-19. The public hearing announcement was published on the NCDEQ website on August 30, 2021.

During this virtual public hearing, we will be receiving oral comments from those individuals who pre-registered to speak at this event. If you are having technical difficulties with Webex, you can use the chat feature in Webex to ask questions or seek assistance.

Joining me for this hearing tonight are several DAQ representatives: From DAQ's Raleigh Central Office we have....

- Zaynab Nasif, Division of Air Quality's Public Information Officer.
- Heather Wylie, Meteorologist with the Division of Air Quality Planning Section

There may also be local officials with us tonight. We thank you for attending.

The comment period for this draft Regional Haze SIP opened on August 30, 2021 and will close on Friday, October 15, 2021. In addition to your oral comments tonight, the Division is also accepting comments via mail, electronic mail and by phone to a voicemail box. The email address and phone number for the voicemail is displayed on your screen. Oral, electronic and written comments will all be equally considered.

The draft SIP, public notice, and pertinent documents related to the SIP are available on the DAQ website at <https://deq.nc.gov/regional-haze>. They are also available to the public at the following locations:

- The Division of Air Quality Central Office, Planning Section located at 217 West Jones Street in Raleigh, NC.
- Asheville Regional Office, located at 2090 U.S. Highway 70 in Swannanoa, NC.
- Washington Regional Office, located at 943 Washington Square Mall in Washington, NC

If you wish to review these materials in person, they are available during normal business hours at the locations I just mentioned. However, due to the COVID-19 pandemic, an appointment is required. Please call-in advance to make an appointment.

The order of events for this hearing are as follows:

1. First, Mr. Randy Strait, the Planning Section Chief at the Raleigh Central Office, will give a brief presentation regarding the draft SIP.

2. This will be followed by the public comment period. We will receive oral comments from those individuals who pre-registered to speak at this event. This will allow us to have an accurate hearing record. Those who have pre-registered will be called on to speak. If time allows, the hearing will then be opened to anyone who has not pre-registered to speak. To provide enough time for public comments, this meeting will be conducted in the following manner:

- Effort will be made to call speakers in the same order of your registrations. Oral statements will be limited to a maximum of 5 minutes (in order to hear as many speakers as possible). This public hearing is scheduled to adjourn no later than 9 pm tonight. I will call the name of each speaker, then our Webex Host, Heather Wylie, will unmute the speaker and tell them it is their turn to speak. I will also announce the name of the next speaker in the queue so they can prepare to provide comments. Please do not start speaking until Heather has indicated that your microphone has been unmuted. Your time will begin when Heather has unmuted your microphone.
- We will keep track of your time and I will announce when your 5 minutes have expired. Please respect the time of all who wish to present oral comments tonight by adhering to the time limits and closing your remarks as quickly as possible once time is up.
- Cross examination of the person presenting comments or me, the Hearing Officer, will not be allowed. Questions directed to Division of Air Quality staff members will not be answered during this hearing. If you have questions for DAQ staff, we can provide you with our contact information so you may contact them after the meeting during normal office hours.

3. After receiving comments this evening, the hearing record will be closed; however, the period for submitting comments does not close until Friday, October 15 at 5pm.

Again, the *only* focus of this virtual public hearing is the presentation of comments related to draft Regional Haze SIP. Comments and the DAQ's responses to the comments will be included in the hearing record for the final SIP submittal to the USEPA.

I will now call on Randy Strait, the Planning Section Chief, to give a brief presentation on the draft Regional Haze SIP.

(Randy speaks...)

Thank you, Randy.

At this time, we will hear from those who pre-registered to provide oral comments this evening. When your name is called, our Webex Host, Heather Wylie, will unmute your microphone so you can provide your comments. To ensure our records are complete,

please clearly state your name and who you are representing. Your comments will be recorded, so please speak loudly and clearly toward your microphone or telephone. Please do not start speaking until the Webex Host has indicated that your microphone has been unmuted. If you are using a telephone, please press ‘Star’ 3 to raise your hand so we can recognize you.

It is critically important for the audio clarity of your comments, that you turn off any speakers that you have that can create feedback. If there is significant feedback on your line, we may need to mute your call and attempt to come back to you later.

If we call your name, but cannot hear you, please check to see if you are muted on the Webex screen on your computer. If you are having audio issues, try a different method of audio connection within Webex or use the “Call Me” feature to have Webex call your personal telephone. If we still cannot hear you, we will proceed to the next registered speaker, but will call your name again at the end of the hearing.

I will do my best to pronounce your names correctly and apologize in advance for any errors. We will now begin taking oral comments.

(Speakers provide comments...)

That is all of the names registered to speak. We have some remaining time, so at this time, if you would like to speak, please put your name in the Webex chat box which you can access at the bottom right hand side of your screen. Once we call your name, we will ask you to either raise your hand in Webex or press star 3 on your phone so that we can allow you to be unmuted and provide your comments. Once you have provided your comments, please lower your hand or again press star 3.

(After names have been called...)

That is all the names I have for those who pre-registered (or asked to provide comments) to speak. If you did not register to speak but still want to provide comments on the draft Regional Haze SIP, remember there are several other ways to provide comments until the end of the comment period on October 15 at midnight. You can call 919-707-8403 and leave a voice mail message with your first and last name, whom you are representing, and state that your comments are related to the draft SIP, or You can provide written comments until the comment period ends on October 15, 2021. To provide written comments, please email them to daq.publiccomments@ncdenr.gov with “NC RH SIP” in the subject line. You can also mail written comments to the address listed in the public notice.

Comments received during tonight’s hearing and throughout the comment period and DAQ’s responses to the comments, will be included in the hearing record for the final SIP submittal to the USEPA.

Thank you again for your cooperation, attendance, and interest in the draft Regional Haze SIP. This public hearing is now adjourned.

2.3. **Staff Presentation (slides)**

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
PUBLIC NOTICE**

PURPOSE: The North Carolina Department of Environmental Quality, Division of Air Quality (DAQ), hereby gives notice regarding its pre-hearing draft of the *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)*. This pre-hearing draft SIP was prepared in accordance with the Federal Regional Haze Rule provisions specified in 40 CFR 51.308(f) and the U.S. Environmental Protection Agency'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) of the Regional Haze Rule. North Carolina's Class I Federal areas (see 40 CFR 81.422) include the Great Smoky Mountains National Park (GSMNP), Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area, and Swanquarter Wilderness Area. The GSMNP and Joyce Kilmer – Slickrock Wilderness Area are located in both North Carolina and Tennessee.

COMMENT PROCEDURES: Any person wishing to comment may submit a written statement for inclusion in the record of proceedings regarding 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)*. Written comments should be submitted electronically or postmarked no later than Friday, October 15.

*If you wish to speak at the digital public hearing, you must register, provide the required information, and follow instructions on ways to join the public hearing. Registration must be completed by 4:00 PM on October 6, 2021. To register, please click the following link: <https://bit.ly/3sPwzUo>.

PUBLIC HEARING DATE & LOCATION: **When:** October 6, 2021 at 6:00 PM EDT
Where: WebEx Digital Hearing <https://bit.ly/3jiDGI2>
Event password: NCDAQ
Phone: US TOLL +1-415-655-0003
Access code: 161 088 6190
To receive a call back, provide your phone number when you join the event, or call the number above and enter the access code.

*For those attending online, DEQ highly recommends testing out your computer's WebEx capabilities prior to the digital public hearing. Please click this link to test an online hearing:
<https://www.webex.com/test-meeting.html>

INFORMATION: Copies of 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)* may be downloaded from the DAQ website at <https://deq.nc.gov/about/divisions/air-quality/air-quality-planning/state-implementation-plans/regional-haze-state-sip>. Comments or requests for a public hearing can be submitted to: daq.publiccomments@ncdenr.gov (Please type "NC RH SIP" in the subject line). Comments can also be accepted via voicemail message at (919) 707-8403 or be mailed or faxed to:

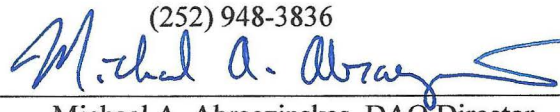
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Based on the current guidance to minimize the spread of COVID-19, all DAQ office locations are limiting public access to appointments only. As such, the Pre-Hearing Draft of the demonstration may only be reviewed in person after making an appointment at the following DAQ offices:

Raleigh Central Office, Planning Section	(919) 707-8403
Asheville Regional Office	(828) 296-4500
Washington Regional Office	(252) 948-3836

Date: 8/27/21



Michael A. Abraczinskas, DAQ Director

2.4. Public Comments (from transcript)

Table I-3 contains a list of all who provided verbal comments at the Public Hearing. A transcription of these comments is provided below.

Table I-3. List of Commenters from Hearing

Name	Organization	Written Comment?
Ulla Reeves	NPCA	Yes
Will Harlan	Blue Ridge Outdoors Magazine	No
Leslie Griffith	Southern Environmental Law Center	No
Krista Early	Environment North Carolina	No
Rachel Woods	Clean Air Holly Springs	No
Marianne Ostebrink	Self	No
Howard Gebhart	Air Resource Specialists	Yes

Ulla Reeves Verbal Comment

My name is Ulla Reeves, I am the senior advocacy manager in the Clean Air program of the National Parks Conservation Association. Thank you for this opportunity to comment on North Carolina's Regional Haze plan. I'll focus my comments on the areas where the SIP falls short in meeting the goals of the program. If left unchanged the state's plan will not comply with the Clean Air Act and the Regional Haze rule as it does not make reasonable progress and does nothing new to limit pollution.

It is important that DAQ get this plan right, so we urge you to take the time to remedy the places that are out of alignment with the EPA clarification memo, stakeholder concerns, and the National Park Service whose concerns have not been adequately addressed in this SIP.

We understand that time is of the essence, but it is critical that North Carolina make continued progress toward clean air for all of our national parks and wilderness areas. North Carolina should have reviewed its impact on any Class I areas not just those inside the borders of this state. The EPA memo says that states must secure additional emission reductions that build on progress already achieved. There is an expectation that reductions be additive to ongoing and upcoming plans, yet DAQ improperly concludes that no new reductions are warranted despite the tens of thousands of tons of controllable pollution through cost-effective controls from facilities across the state. In addition, the source selection threshold should be set to capture meaningful portion of the state's total contribution to visibility impairing Class I areas.

Of the state's 28 sources of visibility polluting facilities, DAQ chose only three non-coal sources because of its reliance on the exceptionally high threshold set through the VISTAS approach, completely omitting North Carolina's top five biggest polluters, which are Duke Energy coal plants.

Second, EPA expects states to consider both sulfur dioxide and nitrogen oxide. Due to its reliance on the flawed VISTAS modeling, DAQ has erroneously omitted NO_x pollution in its entire analysis. This omission must be corrected.

Third, DAQ has routinely emphasized that so much progress has been made in North Carolina Class I areas that we are far ahead of the Haze schedule. Again, North Carolina's haze plan ought to consider impacts on any Class I areas, not just those in our state. And while North Carolina has tackled important air pollution problems in the past, it is inappropriate for DAQ to rely on previous successes or that, or use that haze glide path indicator as justification for doing nothing in this rule making. EPA's memo specifies that a state should not reject pollution controls merely because there have been emission reduction since the first planning period, or merely because visibility is otherwise projected to improve at Class I areas.

Fourth, DAQ is improperly using announced retirements of coal facilities to further justify avoidance of their full consideration in the SIP. Those coal facilities should have been chosen in source selection, fully analyzed, and any planned retirements codified in the Haze SIP as enforceable measures.

Finally, EPA encourages states to consider equity and environmental justice impact. DAQ has not conducted any kind of environmental justice screen, or considered disproportionate impact in source selection, or in emission control evaluation in SIP planning. We urge you to go back and revisit environmental justice considerations.

That concludes my comments. Thank you for your time and the DAQ staff for all their hard work. We look forward to reviewing improvements to this plan.

Will Harlan Verbal Comment

My name is Will Harlan. I am the senior editor of Blue Ridge Outdoors Magazine, part of an outdoor industry that provides 260,000 jobs in the state of North Carolina, and contributes \$28 billion to the North Carolina economy every year.

We signed on to a letter along with 100 other outdoor businesses and organizations across the state urging North Carolina to substantially improve its Haze Rule implementation plan. Businesses across the state and every air breathing North Carolinian will be seriously harmed by this plan. North Carolina's plan does absolutely nothing to improve visibility or air quality. Now, the EPA laid it out for you very clearly a couple of months ago--they issued a clarifying memo that spelled it out exactly what they expect from each State's implementation plan. I want to point out four ways that North Carolina utterly fails to meet EPA's clearly defined expectations.

First: North Carolina does not evaluate nitrogen oxides. I want to read directly from the memo which states "EPA generally expects that each state will analyze sulfur dioxide and nitrogen oxide in selecting sources and determining control measures."

Two: North Carolina's plan excludes five of the six largest sources of Haze causing emissions in the state--Duke's coal burning power plants. The EPA memo clearly states a threshold that excludes a state's largest visibility impairing sources from selection is more likely to be deemed unreasonable.

Three: North Carolina's plan does absolutely nothing. It does not require any additional control measures for the three plants that were evaluated and does zero to improve visibility and air quality in North Carolina. Now, the DAQ seems to be defending this do-nothing-plan by saying we're already on track, so nothing more needs to be done. Well, EPA responds directly and seems to be responding specifically to North Carolina in its memo when it writes "EPA has reviewed several draft Regional Haze SIPs that conclude that additional controls are not needed, because all the Class I areas in their state are below their uniform rates of progress." The 2017 preamble and August 2019 guidance clearly state that it is not appropriate to use the uniform rate of progress in this manner. As a safe harbor, states must select a reasonable number of sources and evaluate and determine reasonable emission reduction measures necessary to make reasonable progress. This plan is supposed to actually make reasonable progress. Right now, this plan proposes to do absolutely nothing.

Four: This plan does not address environmental justice at all. EPA's memo states that it encourages states to consider whether there may be equity and environmental justice impacts when developing their Regional Haze strategies for the second planning period. DAQ has consistently failed to do this. The second largest source of haze causing emissions in North Carolina is the Marshall coal plant just outside of Charlotte. Charlotte has the worst air quality in the state. You could improve the health of the most vulnerable communities, already disproportionately affected by air pollution, and meet your EPA obligations by including the Marshall coal plant in your analysis. Yet you have consistently chosen not to evaluate the second largest source of these emissions in the state.

Finally, DAQ has consistently misrepresented the serious concerns expressed by the National Park Service, which has clearly outlined its concerns over the outdated modeling data used by DAQ and its failure to include nitrogen oxides and its failure to include the coal fired power plants. This was mentioned specifically in the National Park Service's comments to the state. So come on folks, this is not your best work. The Smokys is one of the most polluted parts in the country ranked among the worst for visibility and you're proposing a do nothing plan. I urge the state to adopt a stronger plan that follows EPA's clear instructions, and the National Park Service's recommendations. Include nitrogen oxide and the six additional coal fired power plant sources.

Leslie Griffith Verbal Comment

My name is Leslie Griffith, and I'm a staff attorney with the Southern Environmental Law Center. We have serious concerns that North Carolina is falling short of its obligations under the Regional Haze program. The state has made admirable progress over the last 20 years in providing clearer skies and healthier air across the state, but its

work is not yet done. The state is missing an opportunity to improve clear skies in treasured places like the Smokys, while reigning in dirty energy and protecting communities from harmful air pollution.

First, the state selection of just three sources is unreasonable and against EPA's guidance. When many sources pollute protected areas in North Carolina and its neighboring states, North Carolina has to look at more than just a handful of polluting facilities.

Second, North Carolina has refused to evaluate possible Haze pollution reductions from any of Duke energy's coal fired power plants. These plants are some of the biggest contributors to Haze and smog in the state. Marshall is barely 100 miles from Shining Rock Wilderness--Cliffside is even closer--and DEQ ignores feasible, cost-effective upgrades at these plants that could reduce pollution and haze. DEQ cannot just assume these power plants will pollute drastically less by 2028 unless there are enforceable requirements that guarantee this. By relying on enforceable projections and refusing to even submit these sources to four-factor analysis is contradicting EPA's, clear guidance and contradicting common sense.

Third, DAQ has refused to consider nitrogen oxide pollution, even though this is a bigger and bigger source of Haze pollution. The agency must consider NO_x pollution, both for sources like Domtar Paper Company and Blue Ridge Paper, and for the coal fired power plants that DAQ did not even look at.

Finally, North Carolina is ignoring EPA's clear instructions to incorporate environmental justice into its Regional Haze planning. The same pollution that causes haze also poses serious health and welfare threats to communities who live closest to polluting facilities. DAQ has done no meaningful environmental justice analysis and is not looking to all the communities most effected by pollution. A true environmental justice analysis would not simply look at an area immediately surrounding the Class I areas in the state, it would look at the communities around the polluting facilities themselves.

The Clean Air Act provides clear authority for North Carolina to step up to protect its residents, its neighbors, and its treasured landscapes. The state is unreasonably refusing to use that authority, risking EPA disapproval, and stalling further progress toward clear skies. North Carolina can and must do more. Thank you.

Krista Early Verbal Comment

Thank you for the opportunity to submit comments in response to the draft Regional Haze State Implementation Plan. My name is Krista Early, and I'm an advocate with Environment North Carolina—a state-based nonprofit dedicated to protecting our air water and open spaces.

I'm here today to respectfully ask you to amend the Regional Haze plan to require reductions in unhealthy air pollution from coal-fired power plants and other sources.

North Carolina has a myriad of unique ecosystems, including five Class I areas. It's our responsibility to be good stewards of our environment. Each year people from all across the state and nation visit our parks and protected natural spaces, which extend from Western Asheville to our coastal areas. Our parks and wilderness areas are plagued by air pollution. It threatens the health of our visitors and the communities that neighbor these areas. Polluting facilities that contribute to poor visibility in these areas are also the main drivers of the climate crisis. In fact, nearly 90% of our National Parks are plagued by haze pollution, caused mostly by coal plants, vehicles, and other industrial sources.

Not only do our national parks suffer the consequences from haze pollution, but all North Carolinians do. Environment North Carolina Research and Policy Center released a report titled "Trouble in the Air" that called attention to the very real public health problems air pollution can cause and discussed why tackling climate pollution has an impact on air quality. The data shows that many North Carolinians have suffered through over a month of polluted air in 2020. Clean air quality is paramount for a healthy environment as well, as healthy ecosystems at our national parks. The state of North Carolina has proposed a Regional Haze plan that lacks adequate protections for our parks and communities because it fails to reduce sufficient emissions to help reach clean air goals. An analysis done by the natural National Parks Conservation Association on publicly available data identified the worst sources of his pollution that potentially affects Class I areas in North Carolina. Their analysis cites fossil fuel electric power generation as the worst contributor. Despite the tens of thousands of tons of controllable pollution from North Carolina sources-- including coal fired power plants, paper mills and phosphate facilities and the many opportunities for cost effective controls, North Carolina improperly concluded that no new reductions in pollution are warranted. The state's four-factor emission reduction analysis omitted any coal fired power plants, which resulted in some of the biggest haze polluters in the state not being selected. If left unchanged, we will not be making reasonable progress towards naturally clean air, which is what is at the heart of the Haze rule.

On behalf of the members of Environment North Carolina we ask the North Carolina Division of Air Quality revise the rule to include the evaluation of and require emission reductions by coal fired power plants, the state's largest source of visibility impairing emissions, and to thoroughly assess environmental justice impacts and nitrogen oxide as EPA has recommended.

Rachel Woods Verbal Comment

My name is Rachel Woods. I'm the co-founder of a community led advocacy group, Clean Air Holly Springs, founded in a small bedroom community south of Raleigh. Our goal is to begin a conversation in our community about air quality. We have initiated and idling reduction pledge campaign, asking our community members to not idol and park, knowing that the emissions from combustible engines contributes to the concentration of nitrous oxide which contributes to smog, particulate matter, and climate pollution. It's a simple story and a simple ask we are sharing with our friends and neighbors, although air pollution is anything but simple. I am certain the North Carolina Division of Air Quality

understands the multifaceted, complicated intricacies of air pollution, and yet the regional haze plan in its current form is woefully simplified. While simplifying a message to layman may be necessary to promote behavior change, like not idling parked vehicles, oversimplifying regulations to protect the quality of our air is negligent.

I'm speaking tonight on behalf of my community to voice concern over the proposed Regional Haze plan that, as written, fails to limit haze causing pollution. The coal fired power plants, paper mills, and phosphate plants in our state produce more nitrous oxide, sulfur dioxide, atmospheric-warming carbon dioxide, and particulate matter than any Holly Springs parent running their engine while waiting to pick up a child for practice or school. Yet any changes we can make individually or as a state is a move in the right direction. Coal fired power plants alone account for 46% of the visibility-impairing emissions in our state, and yet they are not included in the draft plan. I am left wondering why our state agency tasked with keeping our air clean would do anything but set high standards for pollution reduction. Our air pollution issues will not be resolved with individual actions alone.

The pollutants you are charged with regulating affect the visibility at our remarkable parks and the biodiversity of our wild areas. They affect the well-being of North Carolina residents, and have a direct effect on worker productivity, attendance in schools, and on the number of tourists coming to our state, boosting local economies, and they contribute to the warming of our planet. Since the inception of the Clean Air Act and the Regional Haze plan, we have seen improvements in air quality. We know regulation works, we have the technology to implement tighter standards, and it is your duty—instilled in you by federal law—to write a plan that can actually make measurable and actionable improvements moving forward.

I ask that you include nitrous oxide emissions in your plan, and that you expand your updated regulations to all 28 haze-creating polluters in our beautiful state of North Carolina. Thank you for this opportunity to comment.

Marianne (Maple) Ostebrink Verbal Comment

My name is Marianne Ostebrink (I go by Maple, like the tree, because I changed my name back to my nature name that I used for camp seven years ago, when it looked like the climate issue is just so scary and people aren't really doing anything about it. You know, like Gretta but I'm older. I was like Gretta when I was younger but anyway...). It's really good to hear Will--he's helped us in Chapel Hill by phone and Zoom to deal with our polluting coal plant that we have on UNC campus that Duke sold to you Wednesday. So, that's been my latest project that I do in my spare retirement. I spent my whole retirement every day, including weekends, I fight for climate, and I fight mostly utilities, and then a bunch of groups--probably ten groups, statewide, nationwide groups--anything I can do to stop this madness, and I appreciate the people that have been on--I just heard the last 3 people share--and NO_x and SO_x are coming right out of our coal plants here. The EPA was in crisis kind of with "Chump" in office, let's face it, so the clean power plan got waylaid, which is terrible. DC is very slow to act. We have no

patience. The American public wants Green New Deal, they want things changed, and DC is very, very slow. But even slow EPA is telling North Carolina, which apparently is even slower than the fed, so that's pretty bad; so, I'm asking them to—DAQ--just passed, I mean, approved a permit for this coal plant here in Chapel Hill (sorry stumbling on my words a little bit). They approved a permit that would be worse than ever for climate and for people to have no limit on the heat, and so they can dump that million pounds a day of coal from West Virginia. People getting black lung up there, mining still, and wherever to get it out in out West in Utah--Powder River basin, it comes by rail--and there's no limit on the amount of heat. So it can be even more NO_x and more SO_x, and then they approve this--how can that even be? We've got county laws, we've got resolutions at county level too all the towns have passed: Apex, Chapel Hill, you know, people want renewables, we want to stop the pollution, yet it just keeps claiming to go on and on. And why is that? I think the Koch brothers have infiltrated our legislature, thanks to Tom Tillis being an Alec and being the head of the state legislature, and now spreading his poisonous ideas to the federal and the Senate as well, working against our people. So it's not only, you know, federal and senate--it's everybody.

And Duke pays everybody to do this. So it's the poison system and we're getting our air poison from this monopoly money from Duke, and it's got to stop, and we need to do it in every corner and every way possible, including DAQ getting with the program, as people have said. Step up and do the right thing because you all have children and grandchildren. It's today, it's us. We're trying to save ourselves, never mind our kids and grandkids--it's getting way worse, and one degree is a billion people dead. If the earth gets one degree, I think centigrade, which is 2 degrees Fahrenheit, approximately. That's a billion people dying from heat, and it's not just old people and babies--it's everybody. Thank you for hearing me.

Howard Gebhart Verbal Comment

My name is Howard Gebhart. I'm a senior air quality scientist, employed at Air Resource Specialists, and I'm appearing at this hearing on behalf of the National Parks Conservation Association, and other conservation organizations--many of which you've already heard from tonight. First I'd like to start with a summary of my qualifications and expertise: I have more than 40 years experiences as an air quality professional, with a specialized expertise in air quality modeling. My comments focus on the modeling aspects of the SIP, but address general modeling concerns, like emission inputs and how the modeling data had been applied. My comments are not specific to the details of the CAMx model itself, but instead are generic to concerns applicable to any air quality modeling. In general, the draft North Carolina Regional Haze SIP requires significant improvement before it can be finalized and sent to EPA for approval. I have prepared, or am preparing, written comments that will be included with the NPCA comment package, and those detailed various deficiencies in the visibility modeling and how the modeling results were applied. My verbal testimony here is a summary of those comments that I'm preparing.

First, the selection of sources contributing to visibility impairment was much too restrictive. In the end sources selected by North Carolina for analysis of emission controls represented only between 3 to 6% of the total extinction budget on the 20% most impaired days. Many more sources representing a larger fraction of the actual visibility impairment need to be considered if the SIP hopes to achieve reasonable progress toward visibility improvement. The modeling approach also relied too much on the CAMx PSAT results as the sole indicator of whether a source contributed to visibility impairment. The area of influence, or AOI, analysis was not used, except to select sources for the PSAT modeling. However, the AOI modeling in fact provided useful information, and identified whether facility emissions would be transported to a nearby Class I area. North Carolina should have placed greater reliance on the AOI modeling in its selection of contributing sources. The SIP also failed to require emission controls at the few sources that were evaluated. Reasonable progress cannot be achieved if no additional control measures are imposed on the sources causing visibility impairment. The lack of control measures was compounded by the 2028 emission projections, which showed substantial emission decreases at many sources. Without enforceable controls, achieving these emission reductions will not be assured. Any and all emission reductions relied upon in the visibility modeling need to be made enforceable through the SIP, or through a revised permit.

My last point is that the 2028 emission projections appear to reflect changes in the utilization at large EGU units in North Carolina. However, the visible visibility modeling did not reflect any changes in EGU utilization. The projected reductions in annual emissions was carried in the model as an across the board reduction in the expected 2028 hour-by-hour emissions. In reality, 2028 short term EGU emissions are unlikely to change significantly in the absence of enforceable control measures. I remind you that visibility impairment is caused by short term emissions, not by the annual emissions total. The modeling did not accurately reflect the expected 2028 operation of EGUs, and as such did not accurately calculate the expected 2028 visibility impacts.

Again, I will ask you to refer to my written comments for the technical information that support these remarks. Thank you.

3.0 Summary of Responses to EPA, NPS, MANE-VU, New Jersey, Public and Industry Comments

3.1. Responses to EPA Comments

The DAQ received the following comments from the U.S. Environmental Protection Agency (EPA) and the National Park Service.

3.1.1. Key Comments

PCS Phosphate and Domtar Paper Company (Domtar): Permit conditions for PCS Phosphate and Domtar which are proposed for adoption into the North Carolina SIP are under further evaluation. The EPA will provide comments in the future and will work with the State to address those comments.

Response: The DAQ revised Section 7.8.3 (Materials Proposed for Adoption into the Regulatory Portion of the North Carolina SIP) to address EPA's comments detailing the monitoring, recordkeeping, and reporting (MRR) and testing requirements proposed for incorporation into the SIP for the No. 2 Hog Fuel Boiler at Domtar and Sulfuric Acid Plant No. 5, No. 6, and No. 7 at PCS Phosphate.

Interstate Consultation: Once interstate consultations regarding four-factor analyses requested for specific sources affecting North Carolina's Class I areas have concluded (see Section 8.3.3), please document the outcomes pursuant to 40 CFR 51.308(f)(2)(ii), including among other things: a) whether the State agrees with the assessment from other states, b) whether there were any disagreements, and c) if there is disagreement, any steps taken to resolve the disagreement.

Response: Section 10.1.1 of the SIP was revised to provide the documentation requested in this comment for each of the states with which North Carolina initiated consultation regarding specific emission sources.

Identification of Class I areas affected by the State and Interstate Consultation: Please add a clarifying statement in the discussion related to Table 7-14 identifying the Class I areas that the State believes it is reasonably anticipated to contribute to and whether the State consulted with the states with those Class I areas pursuant to 40 CFR 51.308(f)(2)(ii).

Response: Section 7.4 of the SIP was revised to address this comment. Section 10.1.2 of the SIP discusses North Carolina emissions source impacts on Class I areas in other states. Section 10.2 of the SIP provides a summary of VISTAS consultation meetings and calls with FLMs, EPA, RPOs and their member states, and other stakeholders (industry and non-governmental organizations) which explained the overall analytical approach, methodologies, tools, and assumptions used during the SIP development process and considered their comments along the way. Section 10.3 further discusses the consultation between the VISTAS and MANE-VU states. Overall, the only Class I areas North Carolina impacted with any significance were within the VISTAS region.

3.1.2. General Comments

The EPA noted that the modeled 2028 RPGs for the clearest days at North Carolina's Class I areas are higher than current visibility conditions during the 20 percent clearest days. EPA asked the State to consider referencing the 2028 clearest days numbers in the EPA visibility modeling and explaining why the 2028 clearest days RPG is biased high.

Response: Section 8.1 of the SIP has been revised to address this comment.

The EPA suggests augmenting the basis for the State's conclusion on page 299 that adding a wet scrubber on Domtar's Hog Fuel Boiler 2 is not cost effective.

Response: Comment is acknowledged. The No. 2 Hog Fuel Boiler is a unique set-up as it is a natural gas and biomass boiler that is used as a control device for several process gas streams at the facility. According to EPA's guidance, "when the cost/ton of a possible measure is within the range of the cost/ton values that have been incurred multiple times by sources of similar type to meet regional haze requirements or any other [Clean Air Act] requirement, this weighs in favor of concluding that the cost of compliance is not an obstacle to the measure being considered necessary to make reasonable progress."¹ The NCDAQ was unable to find documentation of controls in the RACT/BACT/LAER Clearinghouse for devices similar to the No. 2 Hog Fuel Boiler to which the cost effectiveness of a wet scrubber could be compared. Therefore, as explained in Section 7.8.3.1 of the SIP, the NCDAQ is proposing that the existing measures be adopted into the SIP as required by Section 169A(b)(2) of the Clean Air Act.

Please clarify in Section 7.8.1.2 that the visibility benefits modeling for the wet scrubber option related to the Domtar Hog Fuel Boiler 2 four-factor analysis is supplementary information and is not being relied upon by the State for its conclusions as noted in Section 7.8.2.2.

Response: The last paragraph of 7.8.1.2 of the SIP was revised to explain that the information is included solely as supplementary information and that North Carolina did not rely upon the information to support its conclusions documented in Section 7.8.2.2 of the SIP. This clarification was also added to Section 7.8.1.1 of the SIP for BRPP and Section 7.8.1.3 of the SIP for PCS Phosphate.

3.2. Responses to NPS Comments

The NPS provided the following comments.

While we appreciate the North Carolina Department of Environmental Quality's (NCDEQ) detailed responses to our consultation feedback, we find that North Carolina has not made any substantive adjustments to their Regional Haze SIP or their Reasonable Progress determinations in response to this input. Given this, we are now addressing NCDEQ's response to NPS

¹ U.S. EPA, Guidance on Regional Haze State Implementation Plans for the Second Implementation Period, EPA-457/B-19-003, August 20, 2019, page 40, https://www.epa.gov/sites/default/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf.

comments and clarifying that concerns raised during our consultation period remain. Further, based on recent clarification from the Environmental Protection Agency regarding evaluation of “effective controls,” we have adjusted our recommendations with respect to existing controls at North Carolina’s Duke Energy Facilities. In summary, we recommend the following:

1. NCDEQ implement cost-effective nitrogen oxide emission reduction opportunities in this round of regional haze planning and not defer these reductions into the third planning period. As acknowledged by NCDEQ in their monitoring data review, ammonium nitrate is an increasingly important component of anthropogenic haze on the 20% most impaired days.
2. NCDEQ evaluate opportunities to optimize both NO_x and SO₂ pollution control efficiency from the Duke Energy facilities identified by the NPS.

More detailed NPS conclusions regarding the draft SIP and response to FLM consultation comments are provided in the enclosures to this letter. We appreciate having the opportunity to review and comment on this important SIP and look forward to continuing to work with North Carolina toward achieving clean air and clear views for our national parks now and into the future. Through this pursuit of interagency collaboration and incremental improvement, the State of North Carolina can achieve the goal set forth in the Clean Air Act of restoring natural visibility in Class I areas.

Response: The NCDAQ appreciates the NPS’ additional comments and expects to coordinate with the NPS, USFS, and USF&WS in the future regarding regional haze planning for Class I areas in North Carolina. The NCDAQ has reviewed the NPS comments in detail as it did with the comments provided by the NPS during the consultation period. In the pre-hearing draft SIP, the NCDAQ provided detailed responses to FLM comments provided during the consultation process regarding exclusion of NO_x from four-factor analysis, source selection, evaluation of NO_x controls for Duke Energy facilities, and prescribed fire emissions. The NCDAQ has reviewed the additional information the NPS provided in its comments on the pre-hearing draft and, for this planning period, disagrees that the Duke Energy facilities should be evaluated further to optimize NO_x and SO₂ controls. The NPS has not provided any additional information that specifically links emissions from these facilities as a significant contribution to visibility impairment on the 20% most impaired days for nitrate or sulfate. The NCDAQ followed a source selection process that is technically sound and applied consistently in North Carolina and other states to prioritize the facilities with the most significant impacts on visibility in North Carolina’s Class I areas. This process, which included state-of-the-art source apportionment modeling, clearly illustrates that facilities outside North Carolina are the most significant contributors to visibility impairment at Class I areas in North Carolina. The Duke Energy facilities have already significantly reduced SO₂ and NO_x emissions which is why these facilities did not rank as significantly high contributors to visibility impairment relative to other sources. These facilities will certainly be evaluated along with all other emission sources (including mobile sources) for the next planning period.

3.3. Responses to Comments from MANE-VU and New Jersey

The NCDAQ received a comment from MANE-VU and the New Jersey Department of Environmental Protection requesting that North Carolina adopt an ultra-low sulfur fuel oil standards as part of its long-term strategy.

Response: Appendix F-4a and Appendix F-4b contain separate letters the NCDAQ sent to MANE-VU and New Jersey, respectively, responding to the comments.

3.4. Summary of and Responses to Public Comments

3.4.1. Source Selection Methodology

The NCDAQ received comments regarding the source selection methodology in general. Commenters state that the NCDAQ used high thresholds and unnecessary filters to select sources, resulting in an unreasonably low number of selected sources. Commenters state that the NCDAQ should revise the source selection methodology such that all facilities are fully analyzed. Commenters requested that the NCDAQ explain its decision to base source selection on projected 2028 emissions instead of actual emissions and must compare how the suite of selected sources compares with a selection based on historical emissions. Commenters also request that the NCDAQ improve its source data gathering. Commenters stated that the NCDAQ did not provide reasoned basis to support the 1.00% threshold used in the PSAT analysis.

Response: The NCDAQ source selection methodology is thoroughly explained in Section 7.7 of the SIP. North Carolina, as well as the other VISTAS states, used a two-step process for selecting sources. The first step was a screening analysis using the SO₂ and NO_x source category and facility contributions from the AoI analysis described in Section 7.5. The second step was CAMx PSAT modeling of the sources selected in the first step. Sources were then selected for reasonable progress analysis. This two-step process was used to select sources that have the largest contribution to visibility impairment, and thus, greatest opportunity for improving visibility at Class I areas. In the regional haze SIPs developed for the first round of planning, many VISTAS states used the AoI approach and a 1.00% threshold by emission unit. In this second round of planning for regional haze SIPs, all VISTAS states including North Carolina used the AoI/PSAT approach and a $\geq 1.00\%$ PSAT threshold by facility for screening sources for reasonable progress evaluation. Using a facility basis for emission estimates pulled in more facilities as compared to an emission unit-by-unit basis for emission estimates. As a result, more facilities with smaller visibility impacts (in Mm⁻¹) were examined as compared to the first round of regional haze planning.

The NCDAQ selected facilities for a reasonable progress/four-factor analysis if the facility's PSAT contribution was $\geq 1.00\%$ for sulfate or nitrate. This threshold identified 16 out-of-state facilities in 10 states and 3 North Carolina facilities for reasonable progress/four-factor analysis. Given that this is a "regional" program, the NCDAQ determined that selection of a total of 19 facilities impacting North Carolina Class I areas is reasonable and that it is important to engage with the 10 states with facilities with the highest impacts on Class I areas in North Carolina.

Regarding comments on the thresholds, the NCDAQ explains the AoI threshold in Section 7.6.1 and the PSAT threshold in Section 7.7.2 of the SIP. In those sections the NCDAQ also explains that the AoI analysis and the PSAT analysis were not the exclusive methods for selecting sources. As documented in Section 7.7.3 of the SIP, North Carolina also evaluated other sources that were not identified by the AoI and PSAT screening thresholds to ensure that a reasonable set of sources was selected for analysis (see Tables 7-20 through 7-24 of the SIP).

The NCDAQ as well as the other VISTAS states followed EPA's guidance in developing the source screening and source-selection methodology. As of March 2022, North Carolina has a total of 1,118 permitted facilities (302 Title V and 898 non-Title V facilities). As reflected in its guidance, EPA understands that states do not have unlimited resources to conduct a time and resource-intensive four-factor analysis on every facility for every visibility impairing pollutant in the state. The screening approach applied by the VISTAS states followed the same approach that was used for the Round 1 regional haze planning process but applied new state-of-the-art source apportionment modeling techniques for the purpose of modeling air pollution and visibility impacts. The NCDAQ believes that a reasonable number of facilities were analyzed during the source selection process.

Regarding the use of projected 2028 emissions instead of current emissions, EPA states the following on page 17 of its 2019 guidance:²

“Selection of emissions information when estimating visibility impacts (or surrogates) for source selection purposes: All of the techniques described above require estimates of source emissions. Generally, we recommend that states use estimates of 2028 emissions (resolved by day and hour, as appropriate) to estimate visibility impacts (or related surrogates) when selecting sources, rather than values of recent year emissions. By doing so, sources that are projected on a reasonable basis to cease or greatly reduce their operations or to install much more effective emissions controls by 2028 may be removed from further consideration early in the SIP development process, which can reduce analytical costs. Generally, the estimate of a source's 2028 emissions is based at least in part on information on the source's operation and emissions in a representative historical period. However, there may be circumstances under which it is reasonable to project that 2028 operations will differ significantly from historical emissions. Enforceable requirements are one reasonable basis for projecting a change in operating parameters and thus emissions; energy efficiency, renewable energy, or other such programs where there is a documented commitment to participate and a verifiable basis for quantifying any change in future emissions due to operational changes may be another. A state considering using assumptions about future operating parameters that are significantly different

² U.S. EPA, “Guidance on Regional Haze State Implementation Plans for the Second Implementation Period,” EPA-457/B-19-003, August 20, 2019, page 17, accessed from <https://www.epa.gov/visibility/guidance-regional-haze-state-implementation-plans-second-implementation-period>.

than historical operating parameters should consult with its EPA Regional office.”

North Carolina (as well as the other VISTAS states) included only emission reductions in its 2028 emission estimates that are based on on-the-books or on-the-way controls and emission reductions that can be supported by existing documentation, permits, laws, and regulations.³ For North Carolina, the NCDAQ also applied growth factors to 2016 base year emissions for point sources to account for economic growth.⁴ The 2028 projected emissions do not include speculative reductions such as unsubstantiated shutdowns of electricity generating units (EGUs). This approach is consistent with the EPA’s guidance for preparing emissions inventories to support regional haze modeling.^{5,6} Therefore, it is completely reasonable for North Carolina to base the analysis on 2028 emissions that align with establishment of RPGs for 2028 and, for point sources, to incorporate permanent emission reductions that have occurred due to emission unit and facility closures since the 2016 base year.

In addition, as documented in Section 7.7.3 of the SIP, the NCDAQ conducted an additional evaluation of facilities not selected for reasonable progress analysis (i.e., <1.00% contribution to total impairment as a Class I area for sulfate or nitrate). This evaluation compared 2028 projected SO₂ and NO_x emissions to historical emissions and documented existing SO₂ and NO_x controls for the facilities, and, based on this review, concluded that the facilities were well controlled and projected 2028 emissions were reasonable. Therefore, no additional facilities were selected for a reasonable progress analysis.

In the periodic progress report due on January 31, 2025, the NCDAQ will assess emissions trends and any significant changes in anthropogenic emissions within or outside North Carolina and to reassess the 2028 projected emissions compared to historical emissions. If there are any significant emissions changes, such as anticipated emissions reductions that do not occur or unanticipated emissions increases, the NCDAQ is required to assess whether these changes may impede progress on visibility improvement, determine whether the SIP is adequate, and revise the SIP if necessary.

The NCDAQ’s source data collection process and system meet or exceed the source data gathering requirements for all federal rules and state statutes. For emission inventory data collection, the NCDAQ source data collection complies with the federal Air Emissions Reporting Requirement rule and the requirements of the Regional Haze Rule (RHR) (51.308(d)(4)(v), 51.308(f)(2)(iii) and 51.308(f)(6)(v)).

³ Documentation of the 2028 emissions inventory (Task 2) and processing of the emissions for input to CAMx and PSAT modeling (Task 3) is provided on the VISTAS website at <https://www.metro4-sesarm.org/content/vistas-regional-haze-program>.

⁴ Documentation of North Carolina's methods for projecting point source emissions from 2016 to 2028 is provided in Appendix B3 of the North Carolina regional haze SIP.

⁵ See reference 1.

⁶ U.S. EPA, “Emissions Inventory Guidance for Implementation of Ozone and Particulate Matter National Ambient Air Quality Standards (NAAQS) and Regional Haze Regulations,” EPA-454/B-17-002, May 2017, https://www.epa.gov/sites/production/files/2017-07/documents/ei_guidance_may_2017_final_rev.pdf.

The NCDAQ received the following comments regarding the source selection methodology for Duke Energy facilities. Commenters stated that Duke Energy’s coal-fired power plants should have been considered for four-factor analysis and additional controls should be installed on these and other facilities that pollute the air at North Carolina Class I areas. It was requested that DEQ implement cost-effective NO_x emissions reduction opportunities, as well as evaluating opportunities to optimize both NO_x and SO₂ pollution control efficiency from Duke Energy facilities.

Response: The RHR does not require states to evaluate all sources of pollutants for a reasonable progress analysis. States have the discretion to determine which sources will be evaluated and the rule requires that states describe the criteria used to determine which sources are evaluated (see 40 CFR 51.308(f)(2)(i)). Sections 7.4 through 7.6 of the SIP explain the criteria used to select sources and why it results in a reasonable set of sources for analysis. Section 7.7.3.2 of the SIP explains why Duke Energy facilities, among other sources, were not selected for a reasonable progress analysis. Duke Energy facilities statewide are, and are expected to be, effectively controlled for SO₂ and NO_x (see Table 7-43 of the SIP) such that their projected contributions to visibility impairment did not exceed the 1.00% sulfate or nitrate threshold for a four-factor analysis based on PSAT modeling. Note that for the GG Allen plant, Duke Energy permanently shut down Units 2, 3, and 4 in 2021.^{7,8} The ERTAC emission projections for this facility assumed that Units 2 and 3 would be retired in 2024 and Unit 4 would be retired in 2050. This is the only Duke Energy facility for which units were projected to retire before 2028 (other retirements had already occurred when the projections were prepared).⁹

The NCDAQ further found that any other non-EGU point source that significantly impacted a Class I area was either already the subject of a source-specific SIP (e.g., Blue Ridge Paper Products, see Section 7.8.1.1 of the SIP) or that additional controls were not cost effective to achieve visibility improvements (e.g., Domtar, see Section 7.8.1.2 of the SIP).

3.4.2. Glidepaths for Class I Areas

The NCDAQ received comments stating that the NCDAQ attempted to justify deferring any further emission reductions for every major source in the state by pointing out that Class I areas appear to be trending below these area’s uniform rate of progress (URP) or glide path, which DAQ suggests is sufficient to achieve reasonable progress. Commenters also noted that EPA reiterated that the URP is “not a safe harbor,” DAQ’s decision to defer reasonable and cost-effective controls to another planning period, simply because Class I areas are on the glidepath, is contrary to the Clean Air Act and the Regional Haze Rule. Commenters state that the

⁷ Letter from Ms. Julie Turner, Vice President of Carolinas Coal Generation, Duke Energy to Mr. Mark Cuilla, Acting Permitting Section Chief, North Carolina DAQ, April 6, 2021, providing a Retired Unit Exemption Form as a notification that Unit 3 at GG Allen has been permanently removed from service effective March 31, 2021.

⁸ Letter from Ms. Julie Turner, Vice President of Carolinas Coal Generation, Duke Energy to Mr. Mark Cuilla, Air Permitting Section Chief, North Carolina DAQ, January 18, 2022, providing a Retired Unit Exemption Form as a notification that the Unit 2 and Unit 4 at GG Allen have been permanently removed from service effective December 31, 2021.

⁹ See Table 7 (North Carolina EGU Retirements Included in 2016-2028 Projections) of Appendix B-3 to the SIP.

NCDAQ's "glide path" rationale is also misplaced because the agency failed to evaluate the Clean Air Act's reasonable progress factors in determining whether emission reductions may be necessary to ensure reasonable progress towards natural visibility in each Class I area that North Carolina sources affect, as required by the Regional Haze Rule.

Response: The NCDAQ disagrees with these comments. The source selection methodology explained in Section 7.7 of the SIP and Section 3.4.1 of this appendix describes the process the NCDAQ followed to select the list of sources to consider for a reasonable progress evaluation. This methodology is consistent with EPA's 2019 guidance which states the following:¹⁰

(e) Option to consider the five additional factors when selecting sources:
Section 51.308(f)(2)(iv)(E) of the Regional Haze Rule - The anticipated net effect on visibility due to projected changes in point, area, and mobile source emissions over the period addressed by the long-term strategy

A projection of the anticipated net effect on visibility progress that will occur during the second implementation period due to projected changes in emissions from sources within the state can be a useful consideration in determining which in-state sources to select. That is, the amount of net visibility progress during the second period that will result from in-state emission reductions due to ongoing air pollution control programs, including source measures the state has adopted to meet Clean Air Act requirements other than for visibility protection, and any measures that the state has already adopted or will adopt into its LTS for the second implementation period, can be a consideration when determining which sources to include in the analysis of controls measures in the second implementation period. As an early, optional step in developing its SIP, a state may project 2028 visibility conditions assuming only already adopted controls. National-scale modeling runs conducted by EPA may be useful in this process.

The fact that visibility conditions in 2028 will be on or below the URP glidepath is not a sufficient basis by itself for a state to select no sources for analysis of control measures; however, the state may consider this information when selecting sources. See the final rule preamble discussion of this subject at 82 FR 3078 at 3093 and 3099-3100, January 10, 2017. Rather, that fact would serve to demonstrate that, after a state has gone through its source selection and control measure analysis, it has no "robust demonstration" obligation per 40 CFR 51.308(f)(3)(ii)(A) and/or (B).

The NCDAQ did not consider the degree of improvement in visibility as a criterion for deciding if additional controls are needed for the facilities selected for a four-factor analysis (see Section 3.4.4 of this appendix) and revised Section 7.8.1 of the SIP.

¹⁰ See footnote 1, page 22.

3.4.3. Exclusion of NO_x/Nitrate/PM

The NCDAQ received comments regarding NO_x emissions and nitrates. Commenters state that the NCDAQ's analysis used outdated monitoring data that does not represent the shift in nitrate contribution to visibility impairment in the Southeast over the last 5-10 years, that this shift was not reflected in future predictions, and that the NCDAQ did not consider NO_x emission sources for four-factor analyses in this planning period.

Response: As shown in Figure 2-13 through Figure 2-18 on the SIP, sulfates continue to be the largest contributor to anthropogenic visibility impairment at all Class I areas in North Carolina. For the Great Smoky Mountains National Park, ammonium nitrate levels increased in 2017 and 2018 but returned to 2015 levels in 2019 (see Figure 10-4). A similar trend is observed for the Shining Rock Wilderness Areas where the ammonium nitrate increased in 2017 and 2018 but returned to 2016 levels in 2019 (see Figure 10-6). For the Linville Gorge Wilderness Area, ammonium nitrate levels also increased slightly in 2017 and 2018 and declined slightly in 2019 (see Figure 10-5). It is unclear why the ammonium nitrate contribution to total impairment has fluctuated in recent years and further research is needed to understand the factors contributing (e.g., emission sources, weather, and meteorology) to the nitrate fraction at these three Class I areas.

North Carolina reviewed nitrate-specific contribution to visibility impairment as a part of the source selection process. North Carolina specifically incorporated nitrate into its AoI screening methodology in which facilities contributing a combined 3% or more of sulfate and nitrate to visibility impairment at a North Carolina Class I area were selected for further PSAT modeling. Further, nitrate visibility impairment was given equal consideration as sulfate visibility impairment since the 1.00% threshold was applied for each pollutant individually. As discussed in the SIP, several facilities that emitted SO₂ exceeded the 1.00% threshold for sulfate and no facilities that emitted NO_x exceed 1.00% threshold for nitrate. Therefore, facilities that exceeded the 1.00% threshold for sulfate were subjected to a reasonable progress analysis. This approach to focus only on facilities that emitted SO₂ is consistent with EPA's August 2019 regional haze guidance, which allows states to focus on the pollutant species that dominate visibility impairment at the Class I areas affected by emissions from the state and select only sources with emissions of those dominant pollutants and their precursors for reasonable progress analysis.¹¹ Moreover, the regional haze program is a long-term program with the goal of making reasonable progress toward natural visibility conditions over time. If nitrates become an important contributor to visibility impairment in future years, then NO_x emission sources will be incorporated into four-factor analysis requests in future implementation periods.

The EPA's July 2021 regional haze guidance states that EPA expects states to consider SO₂ and NO_x, and any state choosing not to consider both pollutants should show why such consideration would be unreasonable, especially states that considered both

¹¹ See footnote 1, page 11.

pollutants in the first planning period.¹² The NCDAQ believes that it has followed this guidance because all pollutants were considered equally throughout the source selection process. As described in Section 7.4 of the SIP: 1) sulfates continue to be the largest contributor to anthropogenic visibility impairment at all Class I areas within North Carolina and at affected Class I areas nearby North Carolina, and 2) point source facilities continue to be the most significant source of SO₂.

Finally, use of 2011 or 2016 base-year model data (and the specific days that populate the 20% most impaired days for each year) does not significantly change the 2028 RPG values for the 20% most impaired days at Class I areas in North Carolina and the broader VISTAS region.¹³ Further, anthropogenic PM emissions are not, nor are projected to be, a significant impact to visibility impairment to North Carolina Class I areas, as anthropogenic sulfate visibility impairment values are considerably higher than either anthropogenic nitrate or anthropogenic organic matter (see Appendix E-6 of the SIP), the latter of which is formed from PM emissions. PSAT modeling conducted by LADCO using both 2011¹⁴ and 2016¹⁵ base years and a 2028 future year yielded similar conclusions to those generated by the PSAT modeling completed by VISTAS and EPA. These conclusions are (1) ammonium sulfate is projected to be the most significant visibility-impairing pollutant in 2028 relative to other pollutants, and (2) the contribution from ammonium nitrate is roughly equivalent to the contribution from anthropogenic organic carbon. In addition, LADCO's 2011 base year-modeling showed that most of the organic carbon impairment was associated with natural sources.

3.4.4. Four-Factor Analyses

The NCDAQ received the following comments on the four-factor analysis for Blue Ridge Paper Products (BRPP), Domtar Paper Company (Domtar), and PCS Phosphate.

BRPP: The following are responses to detailed technical comments on the four-factor analysis for BRPP.

Response: The trona dry sorbent injection (DSI) system was evaluated as an incremental improvement of SO₂ control beyond what is provided by the wet scrubber. BRPP used the current emission rate as an "inlet" value to represent the incremental reductions possible by addition of a DSI system in sequence with the scrubber. Use of projected

¹² U.S. EPA., "Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period," July 8, 2021. URL: <https://www.epa.gov/system/files/documents/2021-07/clarifications-regarding-regional-haze-state-implementation-plans-for-the-second-implementation-period.pdf>

¹³ U.S. EPA., "Technical Support Document for EPA's Updated 2028 Regional Haze Modeling", September 19, 2019. URL: https://www.epa.gov/sites/default/files/2019-10/documents/updated_2028_regional_haze_modeling_tsd-2019_0.pdf. See Table 3-2.

¹⁴ LADCO. "2011-based 2028 glidepaths and PSAT tracer contributions," https://www.ladco.org/wp-content/uploads/Projects/Regional-Haze/Round2/LADCO_RegionalHaze_2011_28_PSAT_Charts_23July2020.xlsx

¹⁵ LADCO. "2016-based 2028 glidepaths and PSAT tracer contributions," https://www.ladco.org/wp-content/uploads/Projects/Regional-Haze/Round2/LADCO_RegionalHaze_2016_28abc_PSAT_Charts_05June2021.xlsx

2028 emissions is consistent with EPA guidance, and 0.14 lb SO₂/million British thermal unit (MMBtu) is consistent with recent stack test results for the boilers.

The 2017 Sargent and Lundy report does not state that 80% control is possible with trona DSI and an ESP. The report states that it may be possible for a baghouse to achieve from 70% to 90% removal. The units at BRPP are not equipped with baghouses so the 50% control assumption is appropriate.

Recent historical heat rates for coal utility boilers range from around 10,400-10,700 British thermal unit per kilowatt hour (btu/kWh). A 30% conversion efficiency represents a heat rate of 11,373 btu/kwh, which is a reasonable assumption for a non-EGU and for the purposes of this analysis. The actual efficiencies of the BRPP units are even lower because they are not designed for electricity generation, but 30% is an appropriate value for use in the DSI cost spreadsheets which are simply seeking the size of the boiler in terms of power output, were it a utility boiler of similar size and age.

The original analysis was performed before the current version of the cost spreadsheet was available. BRPP has provided updated DSI cost spreadsheets. Removal of this expense is not substantial enough to alter the NCDAQ's determination that the DSI project is not cost-effective. Updated cost effectiveness values are provided in the response to the comment on use of 2016 dollars below. These values have also been updated in Section 7.8 of the SIP narrative.

The EPA Control Cost Manual outlines the "2% and 1% of total capital investment (TCI)" as valid methods for estimating general, administrative and insurance costs. The cost estimate has been revised such that it no longer relies on the IPM algorithms developed from the 2017 Sargent and Lundy report.

BRPP has provided updated DSI cost spreadsheets which include costs in 2020 dollars. These are included in Appendix G of the SIP. In the updated cost spreadsheets with changes to "owner's costs" and conversion to 2020 dollars, cost effectiveness in \$/ton SO₂ removed has changed from \$16,119/ton to \$14,752/ton for the No. 4 power Boiler and from \$14,932/ton to \$13,477/ton for the Riley Coal Boiler. These values have been updated in Tables 7-53 and 7-54 of the SIP. These changes do not alter the determination by the NCDAQ that the DSI with trona is not cost effective for these units.

In response to the request for the NCDAQ to confirm BRPP's 2028 emissions based on the disparity between projected 2028 emissions and the permit limits for these units, it should be clarified that permit limits are always higher than actual emissions (for a facility in compliance). The August 2019 EPA Regional Haze guidance for source selection recommends use of reasonably projected actual emissions rather than recent year emissions or permit allowable emission totals. This projection is usually informed by recent annual emissions, industry growth rates, and source-specific factors indicating any expected increase or decrease in emissions over the time period. The NCDAQ reviewed the emissions projections used for PSAT modeling and verified that the emissions are reasonable and appropriate.

The NCDAQ also received a comment requesting that a four-factor analysis be completed for NO_x emissions sources at BRPP.

Response: The justification for not completing a facility-wide four-factor analysis for NO_x for BRPP and other facilities is provided in Section 3.4.1 and Section 3.4.2 of this appendix.

Domtar: A commenter stated that the NCDAQ should require a facility-wide four-factor analysis for NO_x, and the No 1 Hog Fuel Boiler should be considered for a four-factor analysis for SO₂ (or include enforceable SO₂ reductions measures in the SIP). Additionally, the commenter stated that the NCDAQ's refusal to require a wet scrubber on the No. 2 Hog Boiler is erroneously based on the low visibility benefits at the Swanquarter Wilderness Area. Lastly, the commenter requested that incorrect and undocumented information in the analysis be addressed.

Response to comment on the No. 1 Hog Fuel Boiler:

As explained in Section 7.8.1 of the SIP, the No. 1 Hog Fuel boiler is only expected to fire natural gas and No. 2 fuel oil, and the non-condensable gas supply lines to the boiler have been physically dismantled. With these two facts considered, its projected 2028 SO₂ emissions are very low, making up about 1% of the total SO₂ for the facility in 2028 (see Table 7-55 of the SIP for a comparison of SO₂ emissions between the two hog fuel boilers). Due to the minimal emissions projected for 2028 from this unit, the NCDAQ determined that the current measures in place were not necessary to demonstrate reasonable progress, and a four-factor analysis would result in no effective control options. This decision is supported by the demonstration prepared in Section 7.8.1.2 of the SIP under the heading "No. 1 Hog Fuel Boiler Demonstration that Current Measures Are Not Necessary for Reasonable Progress."

Responses to comments on the No. 2 Hog Fuel Boiler:

The EPA Control Cost Manual states that the installation of the retrofit control system is "[p]robably the most subjective part of the cost estimate." Because the quote provided by the vender does not include a construction assessment informed by the physical layout of the plant, unforeseen demolition and reconstruction of physical space/structures at the facility may be necessary to accommodate the retrofit. Domtar selected a median value which is reasonable considering the quote provided was not particularly detailed, as is common in this sort of study. Domtar makes note of the lack of a detailed constructability study in their discussion of the 1.3 retrofit factor in the four-factor analysis.

Domtar followed the EPA Control Cost Manual to estimate the cost of installing and operating a wet scrubber. Many costs are estimates based on that methodology and others are based on mill specific rates which are reasonable. The NCDAQ is satisfied with the explanation provided.

Historically, Domtar has assessed its sales tax burden on a case-by-case basis because not all expenses are exempt. Also, this \$95,610 tax value represents only about 1% of the

TCI for the project. Therefore, removal of this charge from the cost estimate is neither guaranteed to represent the expected tax implications for the facility, nor would its removal make the control project more cost effective by a significant amount. The construction management charge of \$344,196 is an internal expense not paid to the vender. The cost effectiveness calculation for this project in the four-factor analysis was not altered as a result of either of these comments.

Domtar has provided additional information on the induction fan requirements of this project. The current fan has been monitored during startup and commissioning of the new ESP and has been found to be sufficient to accommodate the ESP but without excess capacity. Therefore, a new induction fan would be needed to operate a wet scrubber and the ESP. The vender's statement that the quote was based on use of the current induction fan was meant to inform the plant that the cost of an upgrade was not included in the quote. Upon discovering the need for a fan upgrade to accommodate the scrubber, Domtar acquired a quote for a new induction fan at about \$3,000,000 installed.

The NCDAQ also received a comment requesting that a four-factor analysis be completed for NO_x emissions sources at Domtar.

Response: The justification for not completing a facility-wide four-factor analysis for NO_x for Domtar and other facilities is provided in Section 3.4.1 and Section 3.4.2 of this appendix.

PCS Phosphate: A commenter stated that the NCDAQ fails to provide documentation and propose SIP emission limitations that reflect projected 2028 SO₂ emissions and reiterates that the SIP must include enforceable emission limitations that reflect SO₂ projections and emissions reductions.

Response: The portion of the July 2021 EPA regional haze guidance memo cited in the comment refers to sources for which current measures are not necessary to make reasonable progress. This is not the case for PCS Phosphate. The NCDAQ has determined that the current controls, emission limits, and MRR requirements at PCS Phosphate are necessary for reasonable progress and has therefore submitted these permit conditions for inclusion in the regulatory portion of the SIP. There is no need to impose lower, arbitrary emission limits nor is there a basis on which a lower limit could be set that guarantees compliance.

3.4.5. PSAT Modeling

The NCDAQ received comments about the PSAT modeling that informed the sources that were chosen for a reasonable progress/four-factor analysis. Commentors stated that the model showed a low bias for sulfates in summer over the southeastern United States; that 2028 hourly emission profiles inaccurately assumed EGU's would operate the same as they did in 2011; and that PSAT modeling is inappropriate to gauge visibility impairment for sources less than 50 kilometers from a Class I area. Commenters also state that any facilities the NCDAQ eliminated from consideration based on the AoI vs. PSAT fractional bias metric (discussed in Section 7.6.3 of the

SIP) should be re-examined because the fractional bias metric uses predicted AoI values instead of monitored or measured values.

Response: The comments made about model performance, or lack thereof, are inconsistent with established precedent on this subject^{16,17} as noted in EPA's 2018 modeling guidance¹⁸ which specifically states that a single performance test should not be a "bright line" to determine usability of said model or not, but rather that a broader, qualitative weight-of-evidence approach should be used that incorporates a number of different performance tests.¹⁹ Bias errors are reduced by the relative response approach - an approach encouraged by EPA -- which uses modeled base and future year values and then applies the percentage difference between the two to observed base-year values, thus reducing "problems posed by imperfect model performance on individual days".²⁰ In reviewing modeled error data for 20% most impaired days, all but one Class I area (Caney Creek in AR) showed normalized mean error (NME) values within criteria.

Temporal emissions profiles for EGUs were kept the same between 2011 and 2028 to prevent "fabricated emissions increases between the two years simply as a result of the temporal profile" (see p 13 of Appendix B2-b of the SIP). This approach of keeping consistent temporal emissions profiles is not only strongly encouraged by EPA's 2018 guidance,²¹ but also is utilized within their own regional haze modeling and stated as much in their 2021 technical support document (TSD) (p. 170).²²

Finally, comments about the ineffectiveness of photochemical modeling for sources nearby to a given Class I area (e.g., less than 50 kilometers) were based on a document written in 2000 and revised in 2010 for the purposes of using CALPUFF for BART-related matters, which were incorporated into states' Round 1 regional haze SIPs but are not considered in North Carolina's Round 2 SIP. CALPUFF has not been incorporated into the modeling for this study and was delisted by EPA as a preferred dispersion model in 2017.²³ Further, there was no mention of the accuracy of photochemical grid modeling at close distances in the commentor's cited study, nor was any study cited that detailed any similar concerns as given in the comments. In summation, the methodology

¹⁶ Boylan, J.W., and A.G. Russell. 2006. PM and light extinction model performance metrics, goals, and criteria for three dimensional air quality models. *Atmos. Environ.* 40:4946– 59. doi:10.1016/j.atmosenv.2005.09.087.

¹⁷ Emery, C.A., Z. Liu, A. Russell, M. Odman, G. Yarwood and N. Kumar. 2017. Recommendations on statistics and benchmarks to assess photochemical model performance, *Journal of the Air & Waste Management Association*, 67:5, 582-598, DOI: 10.1080/10962247.2016.1265027.

¹⁸ U.S. EPA, "Modeling Guidance for Demonstrating Air Quality Goals for Ozone, PM_{2.5}, and Regional Haze," EPA-454/R-18-009, November 29, 2018, accessed from https://www.epa.gov/sites/default/files/2020-10/documents/o3-pm-rh-modeling_guidance-2018.pdf

¹⁹ See footnote 18, p. 69

²⁰ See footnote 18, pp. 99-100

²¹ See footnote 18, p. 62

²² U.S. EPA, "Technical Support Document (TSD) Preparation of Emissions Inventories for the 2016v1 North American Emissions Modeling Platform," March 2021, accessed from https://www.epa.gov/sites/default/files/2021-03/documents/preparation_of_emissions_inventories_for_2016v1_north_american_emissions_modeling_platform_tsd.pdf

²³ U.S. EPA, "Air Quality Dispersion Modeling - Alternative Models," September 14, 2021, <https://www.epa.gov/scram/air-quality-dispersion-modeling-alternative-models>

employed by VISTAS to perform PSAT modeling that North Carolina has used to prioritize facilities for reasonable progress analysis is reasonable and follows EPA's guidance.

Finally, although the fractional bias metric normally compares predicted values with observed values, the AoI and PSAT modeled percentage values are sensitivities for which observations are not available. PSAT is considered the most accurate tool available for evaluating source impacts at receptors. Therefore, PSAT modeled values are treated as the "observed" values and the AoI calculations are treated as the "predicted" values. The fractional bias metric allows for a comparison of relative visibility impairment impact across the sources selected for both PSAT and AoI and shows how well the AoI results match the PSAT modeled values. The data analysis from the fractional bias metric calculation supports the statement that for sources within 100 kilometers of a Class I area, the AoI percentage impact to visibility impairment will be at least three times higher than the same when modeled using PSAT.

3.4.6. Additional reductions for NO_x/Nitrate/PM

The NCDAQ received comments regarding the omission of an impact assessment for nitrate and particle pollution. Additionally, commenters noted that the SIP should consider possible reduction options for both NO_x and PM instead of focusing only on SO₂. The NCDAQ received comments that more NO_x and SO₂ emissions reductions were needed. Commenters note that the NCDAQ refuses to require emission reductions based on purported emission reductions from existing Clean Air Act programs.

Response: As noted in Section 3.4.1 of this appendix, the NCDAQ modeled nitrates, sulfates and the associated PM pollutants for all data categories including point sources. All point sources inside and outside the boundaries of North Carolina that exceeded the established threshold of 1.00% for nitrates or sulfates were requested to conduct a four-factor analysis for reasonable progress.

Additionally, as noted in Section 3.4.2 of this appendix, the NCDAQ has reviewed other modeling studies besides VISTAS, and determined that the key findings from VISTAS were also observed in these other studies, which incorporated a 2016 base year and associated meteorology, instead of or in addition to 2011. Finally, as documented in Section 10.4 of the SIP, visibility impairment contributions from ammonium nitrate as noted at GRSM in recent years will be investigated further in the coming years and, if action is needed in the next iteration of regional haze plans, then action will be taken.

Regarding the statement that the NCDAQ improperly refuses to require emission reductions, as noted in Section 3.4.2 of this appendix, the NCDAQ disagrees with these comments. Emission reductions decisions were not based solely on visibility improvements.

3.4.7. Enforceable Emissions Reduction Measures

The NCDAQ received comments regarding making emissions reduction measures enforceable. Commenters request that when relying on retirements or operational changes to justify no additional controls or equipment upgrades, provisions are needed to ensure emission limitations are permanent, enforceable, and apply at all times.

Response: The EPA’s guidance documents from August 2019 and July 2021 specify that any measures determined to be necessary for reasonable progress must be included in the regulatory portion of the SIP to make them “permanent” (i.e., cannot be revised without an EPA-approved SIP revision).²⁴ This obligation only applies to a source subjected to a reasonable progress assessment/four-factor analysis (i.e., sources that the state determines to have a significant impact on visibility in at least one Class I area). Of the three North Carolina facilities selected for a four-factor analysis, none relied upon future emission reductions or retirements to demonstrate reasonable progress. The EPA’s July 2021 guidance also clarifies that if current measures are not necessary for reasonable progress (as has been demonstrated for the No. 1 Hog Fuel Boiler at Domtar in Section 7.8.1.2 of the SIP), the measures do not need to be included in the regulatory portion of the SIP to make them “permanent.”

This obligation to make reductions permanent and enforceable does not extend to any control or emissions reduction determination outside of the reasonable progress/four-factor analysis requirements including the source selection process. Source selection, as recommended on page 17 of EPA’s August 2019 guidance, is based on reasonable projections of future year actual emissions. This may rely on expected retirements, recent emissions projected into the future, and/or various other factors depending on the circumstance.

3.4.8. Environmental Justice (EJ)

The NCDAQ received comments regarding impacts to EJ communities. Commenters request that the NCDAQ ensure the SIP will reduce emissions and minimize harms to disproportionately impacted communities. Commenters cited EPA’s 2021 Clarification Memo. Other commenters stated that the NCDAQ’s EJ analysis is inadequate.

Response: The first and last sentences of in Section 5.6 of EPA’s July 8, 2021, memorandum²⁵ state: “EPA encourages states to consider whether there may be equity and environmental justice impacts when developing their regional haze strategies for the second planning period.” and “States have discretion to consider environmental justice in determining the measures that are necessary to make reasonable progress and formulating long-term strategies, as long as such consideration is reasonable and not contrary to the

²⁴ Note that emission limits and associated MRR requirements included in Title V permits are federally enforceable at all times prior to being incorporated into the regulatory portion of a state’s SIP.

²⁵ U.S. EPA, Memo from Tsrigotis, Peter to Regional Air Division Directors, Regions 1-10, “Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period,” July 8, 2021, <https://www.epa.gov/visibility/guidance-regional-haze-state-implementation-plans-second-implementation-period>.

regional haze requirements.” Previous EPA regional haze guidance did not include any mention of EJ considerations. The clarification memo does not include any guidance on how to incorporate EJ into evaluating visibility impacts on Class I areas in regional haze plans. At the time of the issuance of the memo, the NCDAQ had mostly completed the draft of the second round of the regional haze SIP. The NCDAQ contacted North Carolina Department of Environmental Quality’s EJ Program. This program is responsible for assessing the sociodemographic composition of communities in locations proximate to the NCDAQ projects. These assessments generally occur when certain types of permit applications or modifications are under NCDAQ review. Staff members of this program worked with NCDAQ staff preparing the SIP to provide analysis and outreach as documented on Section 10.5 of the SIP. The NCDAQ believes that the EJ analysis and additional outreach was an adequate response given the short amount of time between when EPA issued its July 2021 guidance and when regional haze SIPs were due to EPA.

As documented in Section 13 of the SIP, all North Carolina Class I areas are showing significant improvement in visibility for the most impaired days and ensure no degradation of visibility for the clearest days since the base period. These improvements in visibility through reductions in SO₂ and NO_x have resulted in reductions in impacts on all North Carolinians as well as the vulnerable communities. As noted in Section 10.5 of the SIP, the North Carolina Department of Environmental Quality’s EJ Program did make use of the materials provided by EPA. EPA’s program, EJSCREEN, was used to run preliminary reports around the Class I areas in North Carolina.

3.4.9. State Consultation

The joint comment letter from several organizations states that the NCDAQ failed to consult with Ohio and Pennsylvania, and that these states should have been engaged to evaluate and mitigate emissions from Cardinal and Kyger Creek coal-fired power plants in Ohio, and Seward coal-fired power plant in Pennsylvania.

Response: The NCDAQ has completed consultation with all states with whom North Carolina initiated consultation. Section 10.1 and Appendix F of the SIP have been revised to incorporate information received from states in the final SIP submitted to EPA. Revisions to Appendix F include the following:

- Addition of Appendix F-4a, NC’s Response to MANE-VU Comments on NC’s Pre-hearing Draft RH SIP
- Addition of Appendix F-4b, NC’s Response to New Jersey’s Comments on NC’s Pre-hearing Draft RH SIP
- Addition of Appendix F-4c, NC’s Comments on New Jersey’s Draft RH SIP
- Addition of Appendix F-4d, NC’s Comments on New Hampshire’s Initial Draft 2019 RH SIP
- Addition of Appendix F-4e, NC’s Comments on New Hampshire’s Draft 2021 RH SIP

The NCDAQ consulted along with the other VISTAS states with Ohio regarding a reasonable progress analysis for the Cardinal Power Plant. A reasonable progress

analysis for Cardinal Power Plant was provided by the state of Ohio and the NCDAQ agrees with the conclusion. Results of the consultation process have been added to Section 10 and Appendix F of the SIP.

The Kyger Creek, Ohio facility's PSAT results were below the 1.00% PSAT threshold for nitrates and 1.00% PSAT threshold for sulfates for requesting a reasonable progress analysis. This process is documented in Section 7 of the SIP. The Kyger Creek PSAT results for Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area and Swanquarter Wilderness Area can be found in Tables 7.31, 7.32, 7.33, 7.34 and 7.35 of the SIP, respectively.

The NCDAQ consulted along with the other VISTAS states with Pennsylvania. The Seward facility's PSAT results were below the 1.00% PSAT threshold for nitrates and 1.00% PSAT threshold for sulfates for requesting a reasonable progress analysis. This process is documented in Section 7 of the SIP. The Seward PSAT results for Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area and Swanquarter Wilderness Area can be found in Tables 7.31, 7.32, 7.33, 7.34 and 7.35 of the SIP, respectively.

The NCDAQ received comments regarding North Carolina's impact on Class I areas outside of North Carolina, and that the NCDAQ's regional haze SIP should have accounted for them.

Response: Section 7.4 of the SIP documents PSAT modeling for sulfates and nitrates to evaluate the relative contributions to visibility impairment associated with sulfates and nitrates by source category and geographic area within the VISTAS modeling domain. This analysis included evaluating North Carolina's statewide contribution of SO₂ and NO_x emissions to visibility impairment on all Class I areas in the modeling domain associated with all source sectors, EGUs point sector only, and non-EGUs point sector only. Table 7-14 of the SIP presents North Carolina's statewide impacts for each Class I area. Pursuant to 40 CFR 51.308(f)(2)(ii), North Carolina completed consultation with the VISTAS states (see Appendix F-1 of the SIP) and MANE-VU states (see Section 10.3 and Appendix F-4 of the SIP) which contain Class I areas located nearest to North Carolina and to which North Carolina's emissions had the highest sulfate plus nitrate contribution to total sulfate plus nitrate impairment. The state did not consult with states with Class I areas in the LADCO, CENRAP, and WRAP regions because none of the states in these regions contacted North Carolina for consultation, and because the statewide sulfate plus nitrate contribution to total sulfate plus nitrate impairment in the Class I areas in these regions was relatively low (i.e., ranging from 0.00% to 0.12% of total sulfate plus nitrate impairment).

3.4.10. Planning Process

A citizen commenter stated that the Regional Haze program must include planning processes that are rigorous in protecting everyone and everything in the state, and that there must be action taken by the state to hold those industries and entities accountable for diminished air quality in North Carolina.

Response: As documented in the states Air Quality Trends report, North Carolina has achieved tremendous improvements in air quality and has been in attainment with all the federal health-based National Ambient Air Quality Standards (NAAQS) for several years.²⁶ For welfare-based programs, the state has also been in attainment with the secondary NAAQS and is showing tremendous progress toward achieving natural conditions at the states Class I areas well ahead of schedule. The collaborative effort between state leaders, regulatory agencies, electric utilities, industry, and the public have significantly reduced criteria air pollutant emissions to improve air quality in North Carolina in recent years. The state has also achieved significant reductions in hazardous air pollutants.

Section 13 of the SIP documents statewide anthropogenic emission reductions for North Carolina from 2011 through 2019 (the most recent year for which emissions inventory data were available when the SIP was prepared). The long-term strategy for the first planning period, in addition to unplanned emission reductions associated with the closure of facilities and economic forces, have resulted in significant statewide emission reductions in all sectors for all pollutants that contribute to visibility impairment. The percentage of emission reductions for visibility impairing pollutants from calendar year (CY) 2011 to CY2019 are:

- SO₂ emissions have been reduced by 71%.
- NO_x emissions have been reduced by 40%.
- PM_{2.5} emissions have been reduced by 20%.
- VOC emissions have been reduced by 13%.
- PM₁₀ emissions have been reduced by 4%.

Based on the analyses presented in the SIP, North Carolina expects to continue to reduce criteria pollutant emissions through 2028 based on on-the-books and on-the-way controls and emission reductions that can be supported by existing documentation, permits, laws, and regulations. A key success of North Carolina's regional haze program has been to leverage the emission reductions from state, federal, and local control programs that protect North Carolina citizens statewide while also benefitting improvements to visibility in the states Class I areas.

3.4.11. Non-Wood Heating Options

A citizen commenter requested that affordable (non-wood) heating options should be brought to NC, and that newer technologies be invested in that do not contribute to air pollution.

Response: The NCDAQ acknowledges this comment.

²⁶ North Carolina Department of Environmental Quality, Air Quality Trends in North Carolina, October 2020, [chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/viewer.html?pdfurl=https%3A%2F%2Ffiles.nc.gov%2Fncdeq%2FAir%2Fplanning%2FAir_Quality_Trends_in_North_Carolina_2020.pdf&clen=716451&chunk=true](https://efaidnbmnnnibpcajpcgclefindmkaj/viewer.html?pdfurl=https%3A%2F%2Ffiles.nc.gov%2Fncdeq%2FAir%2Fplanning%2FAir_Quality_Trends_in_North_Carolina_2020.pdf&clen=716451&chunk=true).

3.5. Summary of and Responses to Comments from Industry

3.5.1. Duke Energy

Duke Energy provided several comments in support of the state’s use of discretion, application of the screening threshold for source selection, and focus on SO₂ as the primary contributor to haze in NC Class I areas. Duke Energy also provided additional suggestions to support the state’s decision to not include any Duke facilities in its evaluations of the four factors and reasonable progress for this planning period.

Response: The NCDAQ appreciates these comments. Information about the co-firing projects has been added to the SIP in Section 7.7.3.2. The NCDAQ is confident in its decision not to require four-factor analyses from the Duke Energy facilities based on the screening criteria which was applied fairly to all sources with the potential to impair visibility. Consideration of one or more of the five additional factors may provide further evidence to support the decision to omit the Duke Energy facilities from this obligation, but the NCDAQ does not consider this to be necessary. Detailed rationale for the source selection process is documented in Section 7.7 of the SIP as well as in Section 3.4.1 of this appendix.

Duke Energy also provided a comment asking to note the EGU versus non-EGU point source sector impacts on visibility impairment to North Carolina Class I areas.

Response: The following table shows the PSAT modeling results for North Carolina’s EGU and non-EGU point source sectors for both sulfate and nitrate visibility impairment to North Carolina Class I areas.

Class I area	EGU Point (Mm ⁻¹)			Non-EGU Point (Mm ⁻¹)			Total nitrate + sulfate visibility impairment (Mm ⁻¹)
	Nitrate	Sulfate	Total	Nitrate	Sulfate	Total	
GRSM	0.003	0.110	0.112	0.006	0.156	0.162	24.17
JOYC	0.004	0.112	0.116	0.008	0.163	0.171	22.48
LIGO	0.010	0.245	0.255	0.018	0.405	0.423	19.47
SHRO	0.009	0.216	0.225	0.028	0.604	0.632	19.20
SWAN	0.076	0.255	0.331	0.135	0.726	0.861	21.14

Based on these data, the non-EGU point sector does have a more significant impact on visibility impairment than the EGU point sector. The EGU point sector contributes no more than 1.6% of visibility impairment to any North Carolina Class I area.

3.5.2. Domtar Paper Company

Domtar Paper Company provided comments generally in support of the approaches the NCDAQ had taken as well as several requests for clarification. Domtar also stated disagreement with the necessity of including the MRR and testing requirements associated with permitted emission

limits in the SIP as well as a request that any additional compliance measures have no shorter than a 30-day averaging period.

Response: The NCDAQ appreciates these comments. Regarding MRR and testing requirements, Section 169A(b)(2) of the Clean Air Act requires MRR and testing requirements to accompany source-specific emissions limits in the SIP to make the limits federally enforceable and permanent. The NCDAQ is not adding any additional compliance requirements beyond those in the Domtar Title V permit for the No. 2 Hog Fuel Boiler, so the averaging periods have not been changed. Although revisions to the MRR and testing requirements are not expected in the future, the NCDAQ will coordinate with Domtar on the process for revising the requirements in its permit and the SIP should that be necessary.

The SIP has been revised to correct the typographical error for the interest rate (from 3.75% to 3.25%) used in the four-factor analysis for the No. 2 Hog Fuel Boiler and the table references in the narrative of the SIP have been corrected.

The NCDAQ acknowledges Domtar's comment in which the company noted that it typically borrows capital at a rate of 6.5% and states that a 7% interest rate is more appropriate for assessing a capital project related to installing additional controls. The 3.25% interest rate used in the four-factor analysis is an EPA requirement reflecting the prime interest rate at the time the analysis was prepared.

3.5.3. Blue Ridge Paper Products

Blue Ridge Paper Products submitted comments in support of the NCDAQ's determination that existing controls demonstrate reasonable progress at that facility and that BRPP's obligations in a separate source-specific SIP are sufficient to ensure that these measures are permanent and enforceable.

Response: The NCDAQ appreciates these comments. BRPP achieved significant SO₂ emission reductions and has incorporated SO₂ emission limits and associated MRR and testing requirements in a source-specific SIP approved by EPA on November 24, 2020 (85 FR 74884) for incorporation into North Carolina's regulatory SIP (40 CFR 52.1770(d) - EPA-Approved North Carolina Source-Specific Requirements).

4.0 Written Comments Received During Comment Period

Sections 4.1 through 4.4 contain an index of each commenter and the page number where to find their submitted comment.

4.1. Individual Comments

Table I-4-1 includes the list of commenters who submitted unique, individual comments (i.e. not submitted via a form letter).

Table I-4-1. Index of Commenters – Individually Submitted Comments

Name	Representing	Page
Lynorae Benjamin	US EPA, Region 4	1
Kelly Kincaid on behalf of; Pedro M. Ramos	National Park Service	3
Paul Miller	MANE-VU	5
Stella Oluwaseun-Apo	NJ Bureau of Air Quality Evaluation and Planning	8
Sara Laumann	Joint Comment Letter	11
	• <i>National Parks Conservation Association</i>	
	• <i>Sierra Club</i>	
	• <i>Southern Environmental Law Center</i>	
	• <i>CleanAIRE NC</i>	
	• <i>Coalition to Protect America's National Parks</i>	
	• <i>NC League of Conservation Voters</i>	
	• <i>Appalachian Voices</i>	
	• <i>Alliance to Protect our People and the Places We Live</i>	
	• <i>NAACP Stokes County Branch</i>	
	• <i>Center for Biological Diversity</i>	
	• <i>Environment North Carolina</i>	
• <i>NC Conservation Network</i>		
Howard Gebhart*	Air Resource Specialists, on behalf of NPCA Et. Al.	106
Brittany Iery	NC Conservation Network	121
Drew Ball	Appalachian Trail Conservancy	164
Andrew Whelan	Self	196
Lynne Gaudette	Self	197
Nancy Bryant	Self	198
Katherine Marx	Self	199
Alexandra Mabel	Self	200
Beth Hansen	Self	201

Name	Representing	Page
Gloria Shen	Self	202
Daniel Meyer	Evergreen Packaging/Blue Ridge Paper Products	203
Todd Rogers and Diane Hardison	Domtar	204
Aaron M. Flynn	McGuireWoods LLP, on behalf of Duke Energy	208
* also spoke at hearing and submitted comments w NPCA		

4.2. **Effectively Equivalent Comments from Individuals, Form Letter 1**

Table I-4-2 includes the list of commenters who submitted comments via one of two form letters received.

Table I-4-2. Index of Commenters – Form Letter 1

Name	Representing	Page
Michelle Whitehouse	Form Letter	221
Barry Anderson	Form Letter	222
Gretchen Zeiger-May	Form Letter	223
Gerry Hoots	Form Letter	224
Lynne C.	Form Letter	225
Ulla Reeves*	Form Letter	226
Jessica Gustines	Form Letter	227
Chris Bradshaw	Form Letter	228
Joan Roberts	Form Letter	229
Wendy Stevens	Form Letter	230
Kathryn Wright	Form Letter	231
* also spoke at hearing and submitted comments with NPCA		

4.3. **Effectively Equivalent Comments from Individuals, Form Letter 2**

Table I-4-3 includes the list of commenters who submitted a form letter through a form provided by the Sierra Club. The content was effectively equivalent to the form letter in section 4.2.

Table I-4-3. Index of Commenters – Form Letter 2

Name	Representing	Page
Anna Chott	Form Letter	232
Sylvia Bjorkman	Form Letter	233
Randall and Laura Cronin	Form Letter	234
Randall Cronin	Form Letter	235
Sallie Paar	Form Letter	236
Darrell Thompson	Form Letter	237
Susan Howell	Form Letter	238
Donald Grice	Form Letter	239

Name	Representing	Page
Linda Heaset	Form Letter	240
Maria LeBlanc	Form Letter	241
Margaret Woods	Form Letter	242
Pam McLamb	Form Letter	243
Pam McLamb	Form Letter	244
Florence Bernardin Fried	Form Letter	245
William Mays	Form Letter	246
Pat Carstensen	Form Letter	247
Margaret Thompson	Form Letter	248
Joel Wooten	Form Letter	249
Joel Wooten	Form Letter	250
Elizabeth Felty	Form Letter	251
Mary Frazer	Form Letter	252
Keith Johnson	Form Letter	253
Connie Toops	Form Letter	254
Michelle Hunter	Form Letter	255
Michael Eisenberg	Form Letter	256
Jon Pitt	Form Letter	257
Richard Piatkowski	Form Letter	258
Susane Boukamel	Form Letter	259
Rosa Arias	Form Letter	260
Suzanne O"Connell	Form Letter	261
Claudia Kaplan	Form Letter	262
Christine Voss	Form Letter	263
valerie rabeler	Form Letter	264
Frances Moore	Form Letter	265
Shaun Murphy	Form Letter	266
Annie Dude	Form Letter	267
J S	Form Letter	268
Lori Bright	Form Letter	269
BRIDGET J DUNFORD	Form Letter	270
Linda Eastman	Form Letter	271
Joanne McGrath	Form Letter	272
Barbara Benson	Form Letter	273
Traci Hamilton	Form Letter	274
Marla West	Form Letter	275
Joe Bearden	Form Letter	276
Mary Jeffrey	Form Letter	277
m wooley	Form Letter	278
Rebecca Burmester	Form Letter	279
Karen Fulkerson	Form Letter	280
Alice Wieting	Form Letter	281
Micah McLain	Form Letter	282
George Phillips	Form Letter	283

Name	Representing	Page
WJ Richardson	Form Letter	284
Brent Koenig	Form Letter	285
Adrian Smith	Form Letter	286
Marco Peters	Form Letter	287
Ulrich Alsentzer	Form Letter	288
William Garrard	Form Letter	289
Donelle Kerns	Form Letter	290
Daniel Graham	Form Letter	291
Angela Vieth	Form Letter	292
Mariah Mitchell	Form Letter	293
Mary Mcqueen	Form Letter	294
Nancy Kondracki	Form Letter	295
Meredith Arkin	Form Letter	296
Tammi Erving-Mengel	Form Letter	297
Mary Goodkind	Form Letter	298
Diane Arbour	Form Letter	299
Thomas Taylor	Form Letter	300
Brian Burwell	Form Letter	301
Sue E Feldkamp	Form Letter	302
Erin Dalpe	Form Letter	303
Steve Copulsky	Form Letter	304
Shoshana Serxner-Merchant	Form Letter	305
Jamie Murphy	Form Letter	306
Christine Payden-Travers	Form Letter	307
Cynthia Mastro	Form Letter	308
Jim Haaga	Form Letter	309
Kathy Miller	Form Letter	310
William Blaine	Form Letter	311
Julia Young	Form Letter	312
Suzanne Dickson	Form Letter	313
Laurie Pearson	Form Letter	314
Joyce Pusel	Form Letter	315
Jane Brody	Form Letter	316
Tim Wadkins	Form Letter	317
Lenore Guidoni	Form Letter	318
Andra Eich	Form Letter	319
Lee Rynearson	Form Letter	320
Nancy Cason	Form Letter	321
Jody Vaughan	Form Letter	322
Deborah Milkowski	Form Letter	323
Susane Boukamel	Form Letter	324
Christy Jenkins	Form Letter	325
James Zizzo	Form Letter	326
Monica Sanchez	Form Letter	327

Name	Representing	Page
Donald Harland	Form Letter	328
Jill Gooch	Form Letter	329
Jeff Botz	Form Letter	330
Anna Chott	Form Letter	331
Sigrid Hice	Form Letter	332
Alaina Norzagaray	Form Letter	333
Tom Leonard	Form Letter	334
Aimee Quillen	Form Letter	335
John Parker	Form Letter	336
Paula Stober	Form Letter	337
Renee Skudra	Form Letter	338
Ann Bullock	Form Letter	339
Gary Parker	Form Letter	340
Cynthia Smith	Form Letter	341
Wendy Waugh	Form Letter	342
Kathy Orms	Form Letter	343
Jessica Kellam	Form Letter	344
Deborah Swanson	Form Letter	345
Dwight Koeberl	Form Letter	346
Peggy Rainey	Form Letter	347
Glenn Rape	Form Letter	348
Ray Hearne	Form Letter	349
Valerie Booze	Form Letter	350
Brentlee Poston	Form Letter	351
Donald Smyth	Form Letter	352
Dennis Wilkerson	Form Letter	353
Adam Crocker	Form Letter	354
Cheryl Kellogg	Form Letter	355
John and Cathy Thomas	Form Letter	356
Julienne Johnson	Form Letter	357
Lauren Garrett	Form Letter	358
Kristina Heiks	Form Letter	359
William Hunter	Form Letter	360
Rose Shulman	Form Letter	361
Susan Sunflower	Form Letter	362
Michael Marshall	Form Letter	363
Debra Beaver	Form Letter	364
Sue Perry	Form Letter	365
Sheryl Bowman	Form Letter	366
Della Albury	Form Letter	367
Katie Thurman	Form Letter	368
Gina Dowden	Form Letter	369
Sandy Clark	Form Letter	370
keith Johnson	Form Letter	371

Name	Representing	Page
Janet Hendrick	Form Letter	372
Liz Davis	Form Letter	373
Susan Dutcher	Form Letter	374
Brent Koenig	Form Letter	375
Mary Triplett	Form Letter	376
Edith Simpson	Form Letter	377
Karen Fulkerson	Form Letter	378
cayenne kruse	Form Letter	379
Linda Eastman	Form Letter	380
Janine Lafferty	Form Letter	381
Linda Powell	Form Letter	382
Joseph Gardner	Form Letter	383
Gary Feimster	Form Letter	384
Lucy Tyndall	Form Letter	385
Lori Bright	Form Letter	386
David Turner	Form Letter	387
Nina Marable	Form Letter	388
Ginny Nolan	Form Letter	389
Shawna Hanson	Form Letter	390
Renee Fortner	Form Letter	391
Robert Zinn	Form Letter	392
Bridget Dunford	Form Letter	393
Martha Henderson	Form Letter	394
Elizabeth Little	Form Letter	395
Vicky Scott	Form Letter	396
Leonard Cruz	Form Letter	397
Dee Russell	Form Letter	398
Mary Love	Form Letter	399
Teresa Pitts	Form Letter	400
De Corum	Form Letter	401
Ginger White Almeida	Form Letter	402
R Monroe	Form Letter	403
Rob Gelblum	Form Letter	404
Helena Ells	Form Letter	405
Connie Raper	Form Letter	406
Bobby Wynn	Form Letter	407
Gareth Wynn	Form Letter	408
Jeffrey Rix	Form Letter	409
Ariel Wynn	Form Letter	410
Peggy Wynn	Form Letter	411
Beth Rosen	Form Letter	412
Jen Frank	Form Letter	413
Barbara Benson	Form Letter	414
Michelle Lee	Form Letter	415

Name	Representing	Page
Melissa Howell	Form Letter	416
William Reavis	Form Letter	417
Lynn Carey	Form Letter	418
Stefan Walz	Form Letter	419
Irene Zhang	Form Letter	420
Lauren Beissinger	Form Letter	421
Judy Matheny	Form Letter	422
Connie Raper	Form Letter	423
Ann Rowell	Form Letter	424
Shannon Ryan	Form Letter	425
Carol Dugger	Form Letter	426
Mia Elias	Form Letter	427
Judy Smith	Form Letter	428
Paul Mangold	Form Letter	429
Jerome Eischen	Form Letter	430
Tracey Varga	Form Letter	431
Paul Chilton	Form Letter	432
Travis Dickson	Form Letter	433
Curtis Harrison	Form Letter	434
Margie Spears	Form Letter	435
John Calhoun	Form Letter	436
Rosemary Tann	Form Letter	437
Robert Daniel	Form Letter	438
Timothy Zerr	Form Letter	439
Marla West	Form Letter	440
Heather Curtis	Form Letter	441
Julie Gaunt-Harris	Form Letter	442
Andrea Newman	Form Letter	443
Scott Bates	Form Letter	444
Thayer Jordan	Form Letter	445
Doris Jackson	Form Letter	446
Elizabeth Wall	Form Letter	447
Claudia Kaplan	Form Letter	448
David Wells	Form Letter	449
Erv and Jane Kelman	Form Letter	450
Jackson Boone	Form Letter	451
Alyson Winters	Form Letter	452
Judith Rose	Form Letter	453
Anya Gordon	Form Letter	454
Bette Bates	Form Letter	455
Cassie Whiteside	Form Letter	456
Samuel Speciale	Form Letter	457
Joan Grant	Form Letter	458
Gerri Moringello	Form Letter	459

Name	Representing	Page
Frank Moore	Form Letter	460
Jane Carroll	Form Letter	461
Clay Denman	Form Letter	462
Aurelie Ward	Form Letter	463
Amelia Schroeder	Form Letter	464
Joseph Jacob	Form Letter	465
Mary T. Boatwright	Form Letter	466
Jean Ann Wheelock	Form Letter	467
James Randall Walsh	Form Letter	468
Anthony Bond	Form Letter	469
Michael Markham	Form Letter	470
Carol Rados	Form Letter	471
David Traxler	Form Letter	472
Stephanie Fitzpatrick	Form Letter	473
Carol Carlson	Form Letter	474
Kathy Cox	Form Letter	475
Robin Smithwick	Form Letter	476
Ryan Robertson	Form Letter	477
Swann Lander	Form Letter	478
Karen Noftsier	Form Letter	479
E. Anne Felty	Form Letter	480
Karen Langelier	Form Letter	481
Elizabeth Anne Brown	Form Letter	482
Erica Kitchen	Form Letter	483
Jane D. Turner	Form Letter	484
Meghan Prior	Form Letter	485
Ruth Bauer	Form Letter	486
Farzana Ismail	Form Letter	487
Karin Hess	Form Letter	488
Ken Bosch	Form Letter	489
Frank Stroupe	Form Letter	490
Stephen Blundell	Form Letter	491
Steve Roberts	Form Letter	492
Helen Cleereman	Form Letter	493
Rebecca Nussbaum	Form Letter	494
Dottie Bell	Form Letter	495
Ray Flynn	Form Letter	496
Alice Wieting	Form Letter	497
Carmen Plummer	Form Letter	498
Barry Auman	Form Letter	499
Carrie Blair	Form Letter	500
Julie Frey	Form Letter	501
Walter Kross	Form Letter	502
Bev Warner	Form Letter	503

Name	Representing	Page
Claudio Niedworok	Form Letter	504
Tracey Manning	Form Letter	505
Dana Bartelt	Form Letter	506
Carol Keeser	Form Letter	507
Jamie Rasmussen	Form Letter	508
Kelly Martinez	Form Letter	509
Doug Wingeier	Form Letter	510
Richard George	Form Letter	511
Milagros Guzman	Form Letter	512
John Freeze	Form Letter	513
Lawrence East	Form Letter	514
Lauren Flanagan	Form Letter	515
Marcia Greenstein	Form Letter	516
Hellen Shore	Form Letter	517
Jane Rose	Form Letter	518
Cecil Fisher	Form Letter	519
Stephen Weissman	Form Letter	520
Frances Mearoy	Form Letter	521
Cathy Crallejones Jones	Form Letter	522
Jesse Sable	Form Letter	523
Todd Fields	Form Letter	524
Cindy Degrave	Form Letter	525
Joanne Purnell	Form Letter	526
Rebecca Reid	Form Letter	527
Carla Skuce	Form Letter	528
David Fairall	Form Letter	529
Samantha S	Form Letter	530
Jennifer Sparrow	Form Letter	531
Kendall Field	Form Letter	532
Brett Nachman	Form Letter	533
Peggy Fry	Form Letter	534
Ellyn and Neil Kirschner	Form Letter	535
Candace L	Form Letter	536
Valerie Whitfield	Form Letter	537
Jim Atkins	Form Letter	538
Phil Buchanan	Form Letter	539
Patricia Brown	Form Letter	540
M Woolley	Form Letter	541
Katherine Cregger-Marshsll	Form Letter	542
Elizabeth Celli	Form Letter	543
Angie Hendricks	Form Letter	544
Barbara Roberman	Form Letter	545
Susan Redding	Form Letter	546
Theresa Joan Rosenberg	Form Letter	547

Name	Representing	Page
Ruth Van Sickle	Form Letter	548
Bijan Foroutan	Form Letter	549
Tina Vazquez	Form Letter	550
David Loven	Form Letter	551
WJ Richardson	Form Letter	552
Jeffery Blanton	Form Letter	553
Barry Anderson	Form Letter	554
Kicab Castaneda-Mendez	Form Letter	555
Neil Infante	Form Letter	556
Sandra Resner	Form Letter	557
David Linebaugh	Form Letter	558
Cathy Nieman Msn	Form Letter	559
Paul O"Neil	Form Letter	560
Elizabeth Cruise	Form Letter	561
K Packard	Form Letter	562
Joanne Mcgrath	Form Letter	563
Kieta Osteen-Cochrane	Form Letter	564
L Franklin	Form Letter	565
Fred Coppotelli	Form Letter	566
Sh Mur	Form Letter	567
Mara Wooten	Form Letter	568
Jayce Getz	Form Letter	569

4.4. **Effectively Equivalent Comments from Individuals, Mailed Postcards**

Table I-4-4 includes the list of commenters who submitted effectively equivalent post cards through the NPCA, via the US Postal Service.

Table I-4-4. Index of Commenters – Postcard Campaign

Name	Representing	Page
Leslie Jones	Postcard	571
Joe Hart	Postcard	572
Bailey Oliver	Postcard	573
Michael Quillen	Postcard	574
Bradley Libby	Postcard	575
Andy Madewell	Postcard	576
Emily Madewell	Postcard	577
Sue Rice	Postcard	578
Brian Johnson	Postcard	579
Mikayla Sharf	Postcard	580
Elizabeth Kelchner	Postcard	581
Zay Stanley	Postcard	582
Leah Garland	Postcard	583
Sarah Jane Harrell	Postcard	584

Name	Representing	Page
Jennifer Menscer	Postcard	585
Nathaniel Hasking	Postcard	586
Megan Keim	Postcard	587
Elizabeth Taylor*	Postcard	588
Brian Langdon	Postcard	589
Dakota Kramer	Postcard	590
Olivia Stanley	Postcard	591
John Quinn	Postcard	593
Lester Ledbetter	Postcard	594
Joe Thompson	Postcard	595
Robert Ahearn	Postcard	596
Julie Bennett	Postcard	597
Jessica Tugman	Postcard	598
Marylou Diener	Postcard	599
Joey Maines	Postcard	600
Jordan Pierce	Postcard	601
Nancy Rader	Postcard	602
Jen Miller	Postcard	603
J. D. Paschal	Postcard	604
Robert Culler	Postcard	605
Alex Teixeira	Postcard	606
Lona Shockley	Postcard	607
Paul Rose	Postcard	608
Dreydan Wiskes	Postcard	609
Christian Jerome	Postcard	610
Caara Hunter*	Postcard	611
Jeff Hunter	Postcard	612
Robert Hatch	Postcard	613
Jack Mazza	Postcard	614
Victoria Freeman	Postcard	615
Adam Bensley	Postcard	616
Dave Dupont	Postcard	617
Wyatt Salvs	Postcard	618
John Beeken	Postcard	619
Grace Cadigan	Postcard	620
Kevin Cadigan	Postcard	621
Bill Duschek	Postcard	622
Julie Cadigan	Postcard	623
Jarrold Greene	Postcard	624
Shannon Landrum	Postcard	625
Donna Duschek	Postcard	626
Jamie Cook	Postcard	627
Rachel Kushner	Postcard	628
Alison Kelley	Postcard	629

Name	Representing	Page
Kelly DeMalio	Postcard	630
Alec Hougdahl	Postcard	631
Shaylee Walker	Postcard	632
Willard Kelchner	Postcard	633
Kevin Mullen	Postcard	634
Catherine Bilger	Postcard	635
T. Hannon	Postcard	636
Micah Bardo	Postcard	637
Catherine Ottley	Postcard	638
Wyndham Freeman	Postcard	639
Mark Chase	Postcard	640
Seth Johnson	Postcard	642
Krista Young	Postcard	643
Greg Keyser	Postcard	644
Josh Carpenter	Postcard	645
Ethan Davis	Postcard	646
Aimee Quillen	Postcard	647
*Submitted duplicate postcard		

Comments Received



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 14, 2021

Mr. Michael Abraszinskas
Director
Division of Air Quality
North Carolina Department of Environmental Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Dear Mr. Abraszinskas:

Thank you for your letter dated August 30, 2021, transmitting a prehearing package regarding the Regional Haze State Implementation Plan (SIP) for North Carolina Class I Federal Areas for Second Planning Period (2019-2028). These revisions were the subject of a public hearing via Cisco's WebEx teleconference on Wednesday, October 6, 2021. We have completed our review of the submittal and offer the attached comments.

We look forward to continuing to work with you and your staff. If you have any questions, please contact Ms. Pepa Sassin, Chief, Air Regulatory Management Section at (404) 562-9075, or your staff contact Mr. Evan Adams at (404) 562-9009.

Sincerely,
**LYNORAE
BENJAMIN**

Lynorae Benjamin
Chief
Air Planning and Implementation Branch

Digitally signed by LYNORAE
BENJAMIN
Date: 2021.10.14 11:34:00
-04'00'

The U.S. Environmental Protection Agency Preliminary Comments on North Carolina's August 30, 2021, Regional Haze Pre-Hearing Plan

Key Comment

- 1. PCS Phosphate and Domtar Paper Company (Domtar):** Permit conditions for PCS Phosphate and Domtar which are proposed for adoption into the North Carolina State Implementation Plan (SIP) are under further evaluation. The EPA will provide comments in the future and will work with the State to address those comments.
- 2. Interstate Consultation:** Once interstate consultations regarding four-factor analyses requested for specific sources affecting North Carolina's Class I areas have concluded (see Section 8.3.3), please document the outcomes pursuant to 40 CFR 51.308(f)(2)(ii), including among other things: a) whether the State agrees with the assessment from other states, b) whether there were any disagreements, and c) if there is disagreement, any steps taken to resolve the disagreement.
- 3. Identification of Class I areas affected by the State and Interstate Consultation:** Please add a clarifying statement in the discussion related to Table 7-14 identifying the Class I areas that the State believes it is reasonably anticipated to contribute to and whether the State consulted with the states with those Class I areas pursuant to 40 CFR 51.308(f)(2)(ii).

General Comments

- 1. Reasonable Progress Goals (RPGs):** The 2028 RPGs for the clearest days at North Carolina's Class I areas are higher than current visibility conditions during the 20 percent clearest days (see "Table Ex-1-3", p.v). Consider referencing the 2028 clearest days numbers in the EPA visibility modeling and explaining why the 2028 clearest days RPG is biased high.¹
- 2. Domtar:**
 - a.** The EPA suggests augmenting the basis for the State's conclusion on page 299 that adding a wet scrubber on Domtar's Hog Fuel Boiler 2 is not cost effective.
 - b.** Please clarify in section 7.8.1.2. that the visibility benefits modeling for the wet scrubber option related to the Domtar Hog Fuel Boiler 2 four-factor analysis is supplementary information and is not being relied upon by the State for its conclusions as noted in section 7.8.2.2.

¹ See "Future Year (2028) 20% Clearest Days (dv)" in Table 3-2 of the *Technical Support Document for EPA's Updated 2028 Regional Haze Modeling* available at: https://www.epa.gov/sites/default/files/2019-10/documents/updated_2028_regional_haze_modeling-tsd-2019_0.pdf.



United States Department of the Interior



NATIONAL PARK SERVICE

Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

IN REPLY REFER TO:

10.D. (SERO-NR)

October 12, 2021

Randy Strait
NC Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Dear Mr. Strait:

The National Park Service (NPS) appreciates the opportunity to review and provide comments on the Regional Haze State Implementation Plan for North Carolina Class I Areas (2019–2028 Planning Period). Following our consultation meeting on May 25, 2021, North Carolina provided detailed responses on NPS feedback in their updated North Carolina draft State Implementation Plan (SIP). This letter is in response to North Carolina Department of Environmental Quality’s (NCDEQ) detailed responses.

Thank you in advance for your clean air leadership and continuing efforts to assist Great Smoky Mountains, Shenandoah, and Mammoth Cave National Parks regional haze efforts.

Under the Clean Air Act (§169A and B) and Federal Regional Haze Rule (40 CFR §51.308) states are required to develop a State Implementation Plan (SIP) and substantively engage with agencies that manage national parks and wildernesses designated as Class I areas. States are also required to update SIPs every 10 years to address haze-causing air pollution and ensure progress is made toward achieving the overall program goal which is “the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I Federal areas which impairment results from manmade air pollution.”

The NPS manages 48 of the 156 mandatory Class I areas across the country where visibility is an important attribute including North Carolina’s and Tennessee’s Great Smoky Mountains National Park. The NPS additionally manages Mammoth Cave National Park, in Kentucky, and Shenandoah National Park, in Virginia, which are also Clean Air Act designated Class I areas in the region. These special places are home to diverse vegetation and wildlife, unique geology, and inspiring vistas that lift the human spirit. As National Parks, they are to be preserved unimpaired for the benefit and enjoyment of the American public.

Because the clarity of the views associated with these three nationally designated areas is affected by haze from air pollution that comes, in part, from sources in North Carolina, the NPS offers the response and recommendations below (detailed in enclosure) to strengthen the SIP and

further reduce haze-causing pollution in this planning period. This is provided to fulfill our responsibilities under §169A of the Clean Air Act to protect visibility in Class I areas managed by the NPS.

While we appreciate the North Carolina Department of Environmental Quality's (NCDEQ) detailed responses to our consultation feedback, we find that North Carolina has not made any substantive adjustments to their Regional Haze SIP or their Reasonable Progress determinations in response to this input. Given this, we are now addressing NCDEQ's response to NPS comments and clarifying that concerns raised during our consultation period remain. Further, based on recent clarification from the Environmental Protection Agency regarding evaluation of "effective controls," we have adjusted our recommendations with respect to existing controls at North Carolina's Duke Energy Facilities. In summary, we recommend the following:

1. NCDEQ implement cost-effective nitrogen oxide emission reduction opportunities in this round of regional haze planning and not defer these reductions into the third planning period. As acknowledged by NCDEQ in their monitoring data review, ammonium nitrate is an increasingly important component of anthropogenic haze on the 20% most impaired days.
2. NCDEQ evaluate opportunities to optimize both NO_x and SO₂ pollution control efficiency from the Duke Energy facilities identified by the NPS.

More detailed NPS conclusions regarding the draft SIP and response to FLM consultation comments are provided in the enclosures to this letter. We appreciate having the opportunity to review and comment on this important SIP and look forward to continuing to work with North Carolina toward achieving clean air and clear views for our national parks now and into the future. Through this pursuit of interagency collaboration and incremental improvement, the State of North Carolina can achieve the goal set forth in the Clean Air Act of restoring natural visibility in Class I areas.

If you have any questions, please contact Denesia Cheek (404-562-5809) with the NPS Regional Office (DOI Region 2) or Melanie Peters (720-644-7632) with the NPS Air Resources Division.

Sincerely,



Pedro M. Ramos
Acting Regional Director

Enclosure

October 12, 2021

Randy Strait
North Carolina Department of Environmental Quality, Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

RE: Pre-hearing draft of the Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)

Dear Mr. Strait:

The Mid-Atlantic/Northeast Visibility Union (MANE-VU) appreciates the opportunity to comment on the North Carolina Department of Environmental Quality, Division of Air Quality's pre-hearing draft Regional Haze State Implementation Plan for the Second Implementation Period dated August 30, 2021 (hereinafter, the pre-hearing draft). MANE-VU is the regional visibility planning organization of the air agencies in the Mid-Atlantic and Northeast. MANE-VU consists of eleven states, two tribal nations, and the District of Columbia. It coordinates regional haze planning activities to help its members reduce visibility impairment at Class I areas in the MANE-VU region in furtherance of achieving the national visibility goals of EPA's Regional Haze Rule (RHR). To facilitate reasonable progress in visibility protection at its own Class I areas, and at all Class I areas throughout the U.S., MANE-VU is providing comments on the pre-hearing draft.

North Carolina's pre-hearing draft is of interest to MANE-VU because North Carolina emissions were identified by MANE-VU to significantly contribute to visibility impairment at Class I areas in the region. MANE-VU consulted with North Carolina and other states identified as "contributing" and North Carolina was included in the list of states receiving the MANE-VU Inter-RPO "Ask" for contributing states.¹ The North Carolina response and resolution to this Ask must be described in its draft regional haze SIP for review and action by EPA and Federal Land Managers (FLMs) prior to approval. MANE-VU's comments below relate to meeting the MANE-VU Inter-RPO Ask.

¹ *Statement of the Mid-Atlantic/Northeast Visibility Union (MANE-VU) States Concerning a Course of Action in Contributing States Located Upwind of MANE-VU Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)*, August 25, 2017. Available at <https://otcair.org/MANEVU/Upload/Publication/Formal%20Actions/MANE-VU%20Inter-Regional%20Ask%20Final%208-25-2017.pdf>.

MANE-VU Ask

MANE-VU's technical analysis identified haze-impairing emissions from North Carolina and other upwind states as reasonably anticipated to contribute to visibility impairment at MANE-VU Class I areas. Based on this analysis, MANE-VU developed a "MANE-VU Ask" that was sent to North Carolina and the other identified states with five requests for consideration during the upwind states' second haze SIP planning effort. MANE-VU is now providing below our overarching perspective on how well North Carolina's pre-hearing draft addresses each of these areas.

Ask #1: EGUs ≥ 25 MW with installed controls, ensure that controls are run year round.

Consistent with this Ask, MANE-VU notes that there is an enforceable agreement requiring Duke Energy to continuously operate NO_x and SO₂ controls on GC Allen Units 1 and 2 until their retirement in 2024, as described on page 124 of the pre-hearing draft.

Ask #2: For emissions sources having a 3.0 Mm⁻¹ impact or greater at MANE-VU Class I areas, perform a four-factor analysis.

Kapstone Kraft Paper Corporation (EIS Facility ID 8048011) was originally identified by MANE-VU technical analysis as a facility with the potential for 3.0 Mm⁻¹ impact or greater at one or more of MANE-VU's Class I areas. However, after North Carolina identified an input error made by MANE-VU, subsequent MANE-VU analysis showed that this facility's impact was less than 3.0 Mm⁻¹. Because no other individual North Carolina emissions units were identified as having an impact of 3.0 Mm⁻¹ or greater at MANE-VU's Class I areas, Ask #2 is not applicable to North Carolina.

Ask #3: Ultra-low sulfur fuel oil standard

North Carolina did not address the MANE-VU ultra-low sulfur fuel oil Ask. MANE-VU respectfully re-iterates its request of North Carolina to adopt ultra-low sulfur fuel oil standards as part of its long-term strategy or demonstrate in its SIP why it would not be feasible to do so. For distillate oil, this would be essentially the equivalent of on-road diesel, which is already widely available. We note that all MANE-VU states have successfully adopted low sulfur fuel oil requirements.

Ask #4: EGUs and other large sources, pursue enforceable mechanisms to lock in lower emission rates.

MANE-VU notes the enforceable agreements to reduce NO_x and SO₂ emissions as described in Section 7.2.2.2 of North Carolina's pre-hearing draft.

Ask #5: Energy efficiency and clean technologies

MANE-VU recognizes the efforts that North Carolina has made in the area of renewable energy and energy efficiency as described in Section 7.2.7.1 of the pre-hearing draft.

Thank you for your efforts and your consideration of these comments. If you would like further clarification or discussion on any of these comments, please contact the MANE-VU Lead Manager Paul Miller (pmiller@nescaum.org) or the Chairs of the MANE-VU Technical Support Committee, Sharon Davis of the New Jersey Department of Environmental Protection (sharon.davis@dep.nj.gov) and David Healy of the New Hampshire Department of Environmental Services (david.s.healy@des.nh.gov).

Sincerely,

Sharon Davis, New Jersey Department of Environmental Protection

David Healy, New Hampshire Department of Environmental Services

Co-Chairs, MANE-VU Technical Support Committee



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

401 EAST STATE STREET
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PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

SHAWN M. LATOURETTE
Commissioner

FRANCIS C. STEITZ
Director

October 15, 2021

Submitted via email: DAQ.publiccomments@ncdenr.gov

Randy Strait
NC Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Dear Mr. Strait:

Thank you for providing the New Jersey Department of Environmental Protection (NJDEP) the opportunity to comment on North Carolina's pre-hearing draft, titled, *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019- 2028)*, dated August 30, 2021. This SIP pre-hearing draft addresses visibility impacts in North Carolina's five Class I areas: Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area, and Swanquarter Wilderness Area (SWAN).

As a member of the Mid-Atlantic Visibility Union (MANE-VU), NJDEP has reviewed North Carolina's pre-hearing draft and concurs with the comments that are being submitted by MANE-VU. North Carolina must ensure that it addresses the enforceable measures necessary for reasonable progress presented in the MANE-VU Inter-RPO "Ask" in its final regional haze SIP for review and action by EPA. According to the federal Regional Haze rule (40 CFR § 51.308 (f)(2)(ii)(B)), "The State must consider the emission reduction measures identified by other States as being necessary to make reasonable progress in the mandatory Class I Federal area." NJDEP concurs with MANE-VU's comments as follows:

Emission Reduction Measures Identified in the MANE-VU "Asks"

North Carolina's regional haze SIP pre-hearing draft does not adequately address New Jersey and MANE-VU's "Ask"¹ of upwind contributing states as required by 40 CFR § 51.308(f)(2)(ii)(A), "The State must demonstrate that it has included in its implementation plan all measures agreed to during state-to-state consultations or a regional planning process, or measures that will provide equivalent visibility

¹ *Statement of the Mid-Atlantic/Northeast Visibility Union (MANE-VU) States Concerning a Course of Action in Contributing States Located Upwind of MANE-VU Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)*, August 25, 2017.
(<https://otcair.org/manevu/document.asp?fview=Formal%20Actions>)

improvement." New Jersey and MANE-VU's technical analysis identified emissions from North Carolina and other upwind states as reasonably anticipated to contribute to visibility impairment at multiple MANE-VU Class I areas. Based on this analysis, New Jersey and MANE-VU developed a "MANE-VU Ask" that was sent to North Carolina and the other identified states with five requests for consideration during the upwind states' second haze SIP planning effort. The Asks are discussed below:

Ask #1: Electric Generating Units (EGUs) \geq 25 MW with installed controls, ensure that controls are run year-round.

As described in North Carolina's pre-hearing draft, there is an enforceable agreement that requires Duke Energy to continuously operate NO_x and SO₂ control on GC Allen Units 1 and 2 until their retirement in 2024. New Jersey acknowledges these efforts.

Ask #2: Emissions sources with 3.0 Mm⁻¹ impact or greater at MANE-VU Class I areas, perform a four-factor analysis.

Kapstone Kraft Paper Corporation (EIS Facility ID 8048011) was originally identified by New Jersey and MANE-VU technical analysis as a facility with the potential for 3.0 Mm⁻¹ impact or greater at one or more of MANE-VU's Class I areas. However, after North Carolina identified an input error made by MANE-VU, a subsequent MANE-VU analysis showed that this facility's impact was less than 3.0 Mm⁻¹. Because no other individual North Carolina emissions units were identified as having an impact of 3.0 Mm⁻¹ or greater at MANE-VU's Class I areas, Ask #2 is not applicable to North Carolina.

Ask #3: Ultra-low sulfur fuel oil standard

North Carolina did not address this MANE-VU Ask. North Carolina should adopt an ultra-low fuel oil standard consistent with the MANE-VU Ask as part of its long-term strategy (LTS) or demonstrate in its SIP why it would not be reasonable to do so. For distillate oil, this would be essentially the equivalent of on-road diesel, which is already widely available. It should be noted that all MANE-VU states have successfully adopted low sulfur fuel oil standards.

Ask #4: EGUs and other large sources, pursue enforceable mechanisms to lock in lower emission rates.

New Jersey notes the enforceable agreements to reduce NO_x and SO₂ emissions as described in Section 7.2.2.2 of North Carolina's pre-hearing draft.

Ask #5: Energy efficiency and clean technologies

New Jersey recognizes the efforts that North Carolina has made in renewable energy and energy efficiency as described in Section 7.2.7.1 of the pre-hearing draft.

Thank you for the opportunity to comment on North Carolina's pre-hearing draft Regional Haze SIP. If you have any questions regarding this letter or wish to discuss further, please do not hesitate to contact me at Sharon.Davis@dep.nj.gov.

Sincerely,

Sharon Davis, Chief
Bureau of Evaluation and Planning

c:

Richard Ruvo, EPA Region 2
Caroline Freeman, EPA Region 4
Francis C. Steitz, NJDEP
Kenneth Ratzman, NJDEP
Judy Rand, NJDEP
Stella Oluwaseun-Apo, NJDEP



October 15, 2021

Randy Strait
NC Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Comments submitted via email to: daq.publiccomments@ncdenr.gov

Re: Conservation Organizations Comments on North Carolina’s Proposed Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 - 2028)

Dear Mr. Strait:

The National Parks Conservation Association, Sierra Club, Southern Environmental Law Center, CleanAIRE NC, Coalition to Protect America’s National Parks, and NC League of Conservation Voters, Appalachian Voices, Alliance to Protect our People and the Places We Live, NAACP Stokes County Branch,

Center for Biological Diversity, Environment North Carolina and North Carolina Conservation Network (“Conservation Organizations”) submit the following and attached comments regarding the North Carolina Department of Environmental Quality, Division of Air Quality’s (DAQ), Proposed Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 - 2028).

National Parks Conservation Association (“NPCA”) is a national organization whose mission is to protect and enhance America's National Parks for present and future generations. NPCA performs its work through advocacy and education. NPCA has over 1.64 million members and supporters nationwide with its main office in Washington, D.C. and 24 regional and field offices. NPCA is active nation-wide in advocating for strong air quality requirements to protect our parks, including submission of petitions and comments relating to visibility issues, regional haze State Implementation Plans, global warming and mercury impacts on parks, and emissions from individual power plants and other sources of pollution affecting National Parks and communities. NPCA’s members live near, work at, and recreate in all the national parks, including those directly affected by emissions from North Carolina’s sources.

The **Sierra Club** is a national nonprofit organization with 67 chapters and about 830,000 members dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth’s ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. The Sierra Club has long participated in Regional Haze rulemaking and litigation across the country in order to advocate for public health and our nation’s national parks.

The **Coalition to Protect America’s National Parks** (“Coalition”) is a non-profit organization composed of over 1,900 retired, former and current employees of the National Park Service (“NPS”). The Coalition studies, speaks, and acts for the preservation of America’s National Park System. As a group, we collectively represent over 40,000 years of experience managing and protecting America’s most precious and important natural, cultural, and historic resources.

CleanAIRE NC (Action and Innovation to Restore the Environment North Carolina [CANC]) is a North Carolina non-profit advocacy organization. We represent healthcare professionals, educators, scientists, and thousands of other advocates from communities across North Carolina. Together we advance solutions that address three powerful determinants of health in North Carolina: climate change, air pollution, and environmental justice. Through advocacy, education, and research, we are working to protect what connects us and ensure that all North Carolinians have access to clean air and a livable climate.

Southern Environmental Law Center is the largest nonprofit, nonpartisan environmental legal advocacy organization rooted in and focused on the South. The mission of the Southern Environmental Law Center is to protect the basic right to clean air, clean water, and a livable climate; to preserve our region's natural treasures and rich biodiversity; and to provide a healthy environment for all.

The **North Carolina League of Conservation Voters** is a pragmatic, results-oriented, nonpartisan advocacy organization whose mission is to protect the health and quality of life for all North Carolinians. We elect environmental champions, advocate for environmental policies that protect our communities, and hold elected leaders accountable for their decisions. We have worked for over 50 years to create the political environment that will protect our natural environment.

Founded in 1997, **Appalachian Voices** brings people together to protect the forests, land, air, and water of Central and Southern Appalachia and advance a just transition to a generative and equitable clean energy economy.

The **Alliance to Protect our People and the Places We Live** (APPL) is a grassroots organization working on statewide climate change and environmental justice issues, with a particular focus on eastern North Carolina.

The **Stokes County Branch of the NAACP** is a non-profit public interest organization with members who live near and experience air and water pollution from Duke Energy's Belews Creek coal-fired power plant. The NAACP is the nation's oldest and largest civil rights organization whose mission is to ensure the political, educational, social and economic equality of rights of all persons and to eliminate racial hatred and discrimination.

The **Center for Biological Diversity** works to protect endangered species and save life on Earth through science, legal action, media, and policy advocacy. The Center has won protections for more than 440 rare species and secured 230 million acres of critical habitat.

Environment North Carolina is a statewide, citizen-based environmental advocacy organization working for a cleaner, greener, healthier future.

NC Conservation Network is a state-level environmental group that advocates for a safer, healthier North Carolina. Our members and supporters across the state visit the wilderness areas and parks that the haze plan is supposed to protect, and breathe the air harmed by ongoing emissions.

As detailed below, DAQ's proposed SIP will not result in reasonable progress towards improving visibility at the Class I areas its sources impact, including those located in North Carolina: the Great Smoky Mountains National Park; Shining Rock, Linville Gorge and Joyce Kilmer-Slickrock Wilderness Areas; and Swanquarter National Wildlife Refuge as well as Class I areas in neighboring states. To satisfy the Clean Air Act ("Act") and Regional Haze Rule ("RHR") the flaws identified in these comments and in the attached technical reports by Joe Kordzi¹ and D. Howard Gebhart^{2, 3} must be corrected before submittal to EPA, including:

- DAQ's technical analyses for its sources are inconsistent with the Act and RHR requirements;
- DAQ's draft SIP lacks requirements for new emission reductions during this planning period, there are no practically enforceable emission limitations and therefore the plan does not make reasonable progress;
- Despite the Act's four-factor analysis requirements, DAQ dismisses cost-effective upgrades and new controls, asserting that visibility considerations are too small to warrant them;
- DAQ fails to meaningfully consider and adapt its SIP to address the Federal Land Managers' ("FLMs") comments; and
- DAQ fails to analyze environmental justice impacts and ensure the SIP will reduce emissions and minimize harms to disproportionately affected communities.

¹ Joe Kordzi, "A Review of the North Carolina Regional Haze State Implementation Plan" (Oct. 2021). Mr. Kordzi is an independent air quality consultant and engineer with extensive experience in the regional haze program. ("Kordzi Report") (Enclosure 1)

² D. Howard Gebhart, "Technical Review of North Carolina Regional Haze State Implementation Plan Second Round of Regional Haze State Implementation Plans Supplemental Report" (Oct. 2021). ("Gebhart October 2021 Report") (Enclosure 2) Mr. Gebhart is an air quality meteorologist with 40 years of experience in air quality permitting, specializing in air dispersion modeling; and his CV is attached to his report.

³ D. Howard Gebhart, "Technical Review of VISTAS Visibility Modeling for the Second Round of Regional Haze State Implementation Plans" (May 2021). ("Gebhart October 2021 Report") (Enclosure 3)

We incorporate by reference and attach the two technical reports. Additionally, we incorporate by reference and attach the testimony presented by D. Howard Gebhart and Ulla Reeves at DAQ’s public hearing on October 6, 2021.^{4, 5}

⁴ D. Howard Gebhart, “Testimony of Howard Gebhart on Behalf of NPCA and Other Conservation Organizations” (Oct. 6, 2021) (Mr. Gebhart opened his remarks by providing a brief summary of his qualifications and expertise. He explained that he has “more than 40 years experience as an air quality professional with a specialized expertise in air quality modeling.” Further, that his “comments here focus on the air quality modeling, but address general air modeling concerns like emission inputs and how the modeling results have been applied.” Finally he explained that his “comments are not specific to the technical details of the CAMx model, but instead are generic concerns that are applicable to any modeling study.” (Enclosure 9)

⁵ Ulla Reeves, Senior Advocacy Manager in the Clean Air Program of the NPCA, “Testimony of Ulla Reeves on Behalf of NPCA” (Oct. 6, 2021). (Enclosure 10)

Table of Contents

I. Introduction and Background	7
II. Requirements for Periodic Comprehensive Revisions for Regional Haze SIPs	8
III. DAQ’s Source Selection Methodology is Flawed	11
A. Significant Flaws in VISTAS Regional Haze CAMx Modeling and Methods	12
1. Summary of VISTAS Flawed Modeling Input and Methodology Used to Identify Sources	12
2. VISTAS’ High Thresholds and Flawed Methodology Excluded Polluting Facilities that Should be Addressed and Considered for Emission Reducing SIP Measures	13
B. DAQ Unreasonably Excluded Sources	13
C. Source DAQ Wrongly Exempted from the Four-Factor Analysis Requirement and Should Have Required Controls for NO_x and SO₂	14
1. Duke Energy Carolinas, LLC, Marshall Steam Station	14
2. Duke Energy Carolinas, LLC, Belews Creek Steam Station	15
3. Duke Energy Progress, Roxboro Steam Electric Plant	16
4. Duke Energy Carolinas, LLC, Cliffside Steam Station Facility	16
IV. DAQ’s Reliance on the “Glide Path” Violates the Clean Air Act and Regional Haze Rule	17
V. DAQ Improperly Refuses to Require Emission Reductions Based on Purported Emission Reductions from Existing Clean Air Act Programs.	17
VI. DAQ Must Reconsider and Adapt Its SIP to Address Comments from the FLMs	18
VII. DAQ’s Analyses are Inconsistent with the Clean Air Act and Regional Haze Rule Requirements	21
VIII. DAQ’s State-to-State Consultation Process was Inadequate	21
A. DAQ Failed to Consult with Ohio	22
1. Cardinal Power Plant	23
2. Kyger Creek Power Plant	23
B. DAQ Failed to Consult with Pennsylvania	23
IX. Even for Selected Sources, DAQ’s SIP Falls Short	24
A. Blue Ridge Paper Product Canton Mill	24
B. Domtar Plymouth Mill	25
C. PCS Phosphate Aurora Plant	26
X. The Proposed SIP Does Not Contain New Provisions to Ensure Emission Limitations are Permanent, Enforceable and Apply at All Times	27

XI. DAQ Should Analyze the Environmental Justice Impacts of its Regional Haze SIP, and Should Ensure the SIP Will Reduce Emissions and Minimize Harms to Disproportionately Impacted Communities	27
A. Environmental Justice in North Carolina	27
B. Consideration of Environmental Justice to Comply with Executive Orders	28
C. EPA’s Regional Haze Guidance and Clarification Memo for the Second Implementation Period	299
D. DAQ’s Environmental Justice Analysis is Inadequate	29
E. EPA has a Repository of Material Available for Considering Environmental Justice	29
F. EPA Must Consider Environmental Justice	30
G. DAQ Must Consider Environmental Justice under Title VI of the Civil Rights Act	30
Conclusion	31
List of Enclosures	33

I. Introduction and Background

Congress set aside national parks and wilderness areas to protect our natural heritage for generations. Our national parks and wilderness areas are iconic, treasured landscapes. These special places are designated “Class I Areas” under the CAA and as such, their air quality is entitled to the highest level of protection. To improve air quality in our most treasured landscapes, Congress passed the visibility protection provisions of the CAA in 1977, establishing “as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in the mandatory class I Federal areas which impairment results from manmade air pollution.”⁶ “Manmade air pollution” is defined as “air pollution which results directly or indirectly from human activities.”⁷ In order to protect Class I Areas’ “intrinsic beauty and historical and archeological treasures,” the regional haze program establishes a national regulatory floor and requires states to design and implement plans to curb haze-causing emissions within their jurisdictions. Each state must submit for EPA review a SIP designed to make reasonable progress toward achieving natural visibility conditions.⁸

A regional haze SIP must provide “emissions limits, schedules of compliance and other measures as may be necessary to make reasonable progress towards meeting the national goal.”⁹ Two of the most critical features of a regional haze SIP are the requirements for Best Available Retrofit Technology (“BART”) limits on pollutant emissions and a long-term strategy for making reasonable progress towards the national visibility goal.¹⁰ The haze requirements in the CAA present an unparalleled opportunity to protect and restore regional air quality by curbing visibility-impairing emissions from a host of polluting facilities that harm our communities and muddy our skies.

Unfortunately, the promise of natural visibility is unfulfilled because the air across Class I Areas remains polluted by industrial sources, including the sources covered in our comments. Notably, as detailed in the Kordzi Report and summarized below, DAQ excluded from a four-factor analysis the following facilities:

- Duke Energy Carolinas, LLC, Marshall Steam Station;
- Duke Energy Carolinas, LLC, Belews Creek Steam Station;
- Duke Energy Progress, Roxboro Steam Electric Plant; and
- Duke Energy Carolinas, LLC, Cliffside Steam Station Facility.

⁶ 42 U.S.C. § 7491(a)(1).

⁷ *Id.* § 7491(g)(3).

⁸ *Id.* § 7491(b)(2).

⁹ 40 C.F.R. § 51.308(d)(3).

¹⁰ *Id.*

Where DAQ is relying on retirements or operation changes to justify a no control and no upgrade option, DAQ should make those changes enforceable as SIP measures. To the extent that a state declines to evaluate additional pollution controls for any source based on that source's planned retirement or decline in utilization, it must incorporate those operating parameters or assumptions as enforceable limitations in the second planning period SIP. The Clean Air Act requires that "[e]ach state implementation plan . . . shall" include "enforceable limitations and other control measures" as necessary to "meet the applicable requirements" of the Act.¹¹ The Regional Haze Rule similarly requires each state to include "enforceable emission limitations" as necessary to ensure reasonable progress toward the national visibility goal.¹² Moreover, where a source plans to permanently cease operations or projects that future operating parameters (*e.g.*, limited hours of operation or capacity utilization) will differ from past practice, and if this projection affects whether additional pollution controls are cost-effective or necessary to ensure reasonable progress, then the state "must" make those parameters or assumptions into enforceable limitations.¹³

Our comments and the Kordzi Report further identify issues with DAQ's proposed four-factor analysis for the following sources:

- Blue Ridge Canton Mill;
- Domtar Plymouth Mill; and
- PCS Phosphate Aurora Plant.

Finally, given the impacts to North Carolina's Class I areas from sources in Ohio and Pennsylvania, DAQ should have engaged with Ohio and Pennsylvania requesting that the states evaluate and mitigate emissions from the:

- Cardinal and Kyger Creek coal-fired power plants in Ohio; and
- Seward coal-fired power plant in Pennsylvania.¹⁴

Implementing the regional haze requirements promises benefits beyond improving views. Pollutants that cause visibility impairment also harm public health. For example, oxides of nitrogen ("NO_x") are a precursor to ground-level ozone which is associated with respiratory disease and asthma attacks. NO_x also reacts with ammonia, moisture and other compounds to form particulates that can cause and/or worsen respiratory diseases, aggravate heart disease, and lead to premature death. Similarly, sulfur dioxide ("SO₂") increases asthma symptoms, leads to increased hospital visits, and can also form particulates. NO_x and SO₂ emissions also harm terrestrial and aquatic plants and animals through acid rain as well as through deposition of nitrates (which in turn cause ecosystem changes including eutrophication of mountain lakes).

II. Requirements for Periodic Comprehensive Revisions for Regional Haze SIPs

In developing its long-term strategy, a state must consider its anthropogenic sources of visibility impairment and evaluate different emission reduction strategies including and beyond those prescribed by the

¹¹ 42 U.S.C. § 7410(a)(2)(A).

¹² See generally 40 C.F.R. § 51.308(d)(3).

¹³ See 40 C.F.R. pt. 51, App. Y § (IV)D.4.d.2.

¹⁴ North Carolina did not engage Ohio or Pennsylvania. Proposed SIP, Appendix F-1.

BART provisions.¹⁵ A state should consider “major and minor stationary sources, mobile sources and area sources.”¹⁶ At a minimum, a state must consider the following factors in developing its long-term strategy:

- (A) Emission reductions due to ongoing air pollution control programs, including measures to address reasonably attributable visibility impairment;
- (B) Measures to mitigate the impacts of construction activities;
- (C) Emissions limitations and schedules for compliance to achieve the reasonable progress goal;
- (D) Source retirement and replacement schedules;
- (E) Smoke management techniques for agriculture and forestry management purposes including plans as currently exist within the State for these purposes;
- (F) Enforceability of emission limitations and control measures; and
- (G) The anticipated net effect on visibility due to projected changes in point, area, and mobile emissions over the period addressed by the long-term strategy.¹⁷

Additionally, a state:

Must include in its implementation plan a description of the criteria it used to determine which sources or groups of sources it evaluated and how the four factors were taken into consideration in selecting the measures for inclusion in its long-term strategy.¹⁸

In developing its plan, the state must document the technical basis for the SIP, including monitoring data, modeling, and emission information, including the baseline emission inventory upon which its strategies are based.¹⁹ All of this information is part of a state’s revised SIP and subject to public notice and comment. A state’s reasonable progress analysis must consider the four factors identified in the CAA and regulations. *See* CAA 169A(g)(1); 40 C.F.R. § 51.308(f)(2)(i) (“the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and the remaining useful life of any potentially affected anthropogenic source of visibility impairment.”)

EPA’s 2017 RHR Amendments made clear that states are to first conduct the required four-factor analysis for selected sources, and then use the results from its four-factor analyses and determinations to develop the reasonable progress goals.²⁰ Specifically, EPA explained in its final notice that it proposed, took and responded to comments and amended 40 C.F.R. § 51.308(f) to eliminate the cross-reference to 40 C.F.R. §51.308(d) to “codify ...[its] long-standing interpretation of the way in which the existing regulations were intended to operate” to track “the actual [SIP] planning sequence” as follows, thus, states are required to:

- [C]alculate baseline, current and natural visibility conditions, progress to date and the [Uniform Rate of Progress] URP;
- [D]evelop a long-term strategy for addressing regional haze by evaluating the four factors to determine what emission limits and other measures are necessary to make reasonable progress;

¹⁵ 40 C.F.R. § 51.308(f).

¹⁶ *Id.* § 51.308(f)(2)(i).

¹⁷ *Id.* § 51.308(f)(2)(iv).

¹⁸ 40 C.F.R. § 51.308(f)(2)(i).

¹⁹ 40 C.F.R. § 51.308(f)(2)(i).

²⁰ 82 Fed. Reg. 3078, 3090-1 (Jan. 10, 2017).

- [C]onduct regional-scale modeling of projected future emissions under the long-term strategies to establish RPGs and then compare those goals to the URP line; and
- [A]dopt a monitoring strategy and other measures to track future progress and ensure compliance.²¹

Moreover, in promulgating the RHR EPA stated that:

The CAA requires states to determine what emission limitations, compliance schedules and other measures are necessary to make reasonable progress by considering the four factors. The CAA does not provide that states may then reject some control measures already determined to be reasonable if, in the aggregate, the controls are projected to result in too much or too little progress. Rather, the rate of progress that will be achieved by the emission reductions resulting from all reasonable control measures is, by definition, a reasonable rate of progress. ... [I]f a state has reasonably selected a set of sources for analysis and has reasonably considered the four factors in determining what additional control measures are necessary to make reasonable progress, then the state’s analytical obligations are complete if the resulting RPG for the most impaired days is below the URP line. *The URP is not a safe harbor*, however, and states may not subsequently reject control measures that they have already determined are reasonable.²²

Thus, the key determinant in whether a state’s “robust determination” obligation has been satisfied under Section 51.308(f)(3)(ii)(B) is not whether the Reasonable Progress Goal (“RPG”) of a Class I Area is below that Class I Area’s URP, but rather whether a state has considered and determined requirements to make reasonable progress based on the four factors. A state must consider the four factors *regardless* of the status of any Class I Area’s RPG.

The state’s SIP revisions must also meet certain procedural and consultation requirements.²³ The state must consult with the FLMs and look to the FLMs’ expertise of the lands and knowledge of the way pollution harms them to guide the state to ensure SIPs do what they must to help restore natural skies.²⁴ The rule also requires that in “developing any implementation plan (or plan revision) or progress report, the State must include a description of how it addressed any comments provided by the Federal Land Managers.”²⁵

In May 2020, NPCA shared the petition it submitted to the previous EPA Administrator – which sought reconsideration of the 2019 RH guidance²⁶ – alongside a cover letter to North Carolina.²⁷ In addition to NPCA, Sierra Club, Natural Resources Defense Council, Western Environmental Law Center, Appalachian Mountain

²¹ *Id.* at 3091.

²² *See*, 82 Fed. Reg. 3078, 3093 (Jan. 10, 2017) (emphasis added).

²³ For example, in addition to the RHR requirements, states must also follow the SIP processing requirements in 40 C.F.R. §§ 51.104, 51.102.

²⁴ 40 C.F.R. § 51.308(i).

²⁵ *Id.* § 51.308(i)(3).

²⁶ EPA issued the 2019 Final Guidance on August 20, 2019 via Memorandum from Peter Tsirigotis, Director at EPA Office of Air Quality Planning and Standards to EPA Air Division Directors. Guidance on Regional Haze State Implementation Plans for the Second Implementation Period, EPA-457/B-19-003 (Aug. 2019), https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf. (“EPA 2019 RH Guidance”)

²⁷ “Petition for Reconsideration of Guidance on Regional Haze State Implementation Plans for the Second Implementation Period,” submitted by National Parks Conservation Association, Sierra Club, Natural Resources Defense Council, Coalition to Protect America’s National Parks, Appalachian Mountain Club, Western Environmental Law Center and Earthjustice, to former EPA Administrator Andrew Wheeler (May 8, 2020). (“Conservation Organizations Petition”). (Enclosure 4)

Club, Coalition to Protect America's National Parks, and Earthjustice, signed the petition for reconsideration. As of the date of this comment letter, EPA has not responded to the Petition. Until EPA withdraws the illegal approaches in the 2019 guidance, we trust states will not follow those approaches, instead adhering closely to the regulation itself and working to achieve reasonable progress toward the CAA goal of Class I visibility restored to natural conditions.²⁸

On July 9, 2021, EPA issued a memorandum titled, “Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period.”²⁹ EPA’s July 2021 Memo provides important information regarding development of SIPs for all states for the regional haze second planning period in response to questions and information EPA is receiving from states and stakeholders and clarifies and provides information on existing statutory and regulatory requirements.³⁰ Because EPA’s Memo is directly relevant to—and in some cases, confirms—numerous flaws in the DAQ’s proposed SIP, as explained below and in the attached technical reports, we urge DAQ to reevaluate its proposed SIP. We strongly encourage DAQ to take the time necessary to carefully review and consider all the information in EPA’s July 2021 Memo and develop supporting information and make necessary adjustments to its proposed SIP.

Finally, the duty to ensure reasonable progress requirements are met for purposes of the SIP rests with the state. While a state may request information and analysis from its sources, and importantly collaborate with its regional planning organization throughout the haze planning process, the state is ultimately accountable for preparing, adopting, and submitting a compliant SIP to EPA. Further, North Carolina’s SIP must be supported by a reasoned analysis that includes and cites to the technical support documentation it proposes to rely on and use as part of its SIP revision.³¹

III. DAQ’s Source Selection Methodology is Flawed

DAQ’s source selection methodology screens out nearly all sources of visibility-impairing pollution from consideration. EPA’s July 2021 Memo made clear that DAQ’s source selection methodology is flawed and cannot be approved by EPA. EPA made clear that States must secure additional emission reductions that build on progress already achieved; there is an expectation that reductions add to ongoing and upcoming reductions under other CAA programs.³² In evaluating sources for emission reductions, EPA emphasized that:

²⁸ The Petition explained that, as issued, the Final Guidance conflicts with this statutory objective, previous rulemaking and guidance; misdirects states as to how they can go about complying with their legal obligations to make reasonable progress towards restoring natural visibility to protected public lands; and otherwise fails to set expectations that comport with legal requirements for the second planning period. Further, we petitioned the prior Administrator to replace it with guidance that comports with the CAA and the RHR, 42 U.S.C. §§ 7491, 7492; 82 Fed. Reg. 3078 (Jan. 10, 2017); 71 Fed. Reg. 60,612 (Oct. 13, 2006); 70 Fed. Reg. 39,104 (July 6, 2005); 64 Fed. Reg. 35,714 (July 1, 1999), and aids states in making progress towards achieving the national goal of natural visibility conditions at all Class I Areas. Conservation Organizations Petition at 1-2. The Petition includes a detailed analysis of the issues. As of the date of this comment letter, EPA has not responded to our Petition.

²⁹ EPA Memorandum from Peter Tsirigotis, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors, “Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period,” (July 9, 2021) (“EPA July 2021 Memo”), <https://www.epa.gov/visibility/clarifications-regarding-regional-haze-state-implementation-plans-second-implementation>. (Enclosure 5)

³⁰ *Id.*

³¹ *See, e.g.*, 40 C.F.R. §§ 51.100, 51.102, 51.103, 51.104, 51.105 and Appendix V to Part 51.

³² *EPA July 2021 Memo* at 2.

Source selection is a critical step in states’ analytical processes. All subsequent determinations of what constitutes reasonable progress flow from states’ initial decisions regarding the universe of pollutants and sources they will consider for the second planning period. States cannot reasonably determine that they are making reasonable progress if they have not adequately considered the contributors to visibility impairment. Thus, while states have discretion to reasonably select sources, this analysis should be designed and conducted to ensure that source selection results in a set of pollutants and sources the evaluation of which has the potential to meaningfully reduce their contributions to visibility impairment.³³

Therefore, it is generally not reasonable to exclude from further evaluation larger sources of visibility-impairing pollution. Yet DAQ selected only three sources for a four-factor analysis and excluded all of Duke Energy’s coal-fired power plants in the state. DAQ also does not appear to have requested four-factor analyses for any sources in other states.

A. Significant Flaws in VISTAS Regional Haze CAMx Modeling and Methods

As explained in the May 12, 2021, letter to the Air Division Directors of the VISTAS states, we commissioned an expert modeler to better understand the VISTAS approach and found critical problems with the VISTAS model itself as well as the approach recommended to Southeastern states.³⁴

1. Summary of VISTAS Flawed Modeling Input and Methodology Used to Identify Sources

NPCA’s commissioned independent review revealed that the VISTAS modeling effort suffers from four serious flaws summarized in Table I and further discussed below.

Figure 1. Summary of VISTAS II CAMx Modeling Flaws and Consequences

	Flawed Modeling Inputs and Methods	Consequences of Reliance on VISTAS Inputs By States in Preparing SIPs
1	Inaccurately reflects sulfate concentrations in the Southeast U.S.	Would excuse heavy sulfur dioxide (SO ₂) polluters from review.
2	Used Electric Generating Unit (EGU) emission profiles from 2011 to project the EGUs emissions in 2028, inaccurately assuming that EGUs will operate in 2028 as they did in 2011.	Would fail to identify EGUs that must be analyzed for emission reductions because the model results do not accurately reflect the actual/most recent EGUs’ contributions to visibility impairment.
3	Used outdated monitoring data that does not represent the dramatic shift in nitrate contribution to visibility impairment in	Would erroneously exclude problematic sources from review and avoid emission controls for large NO _x emitting sources

³³ *Id.* at 3.

³⁴ Letter from Stephanie Kodish, NPCA, Leslie Griffith, SELC, and David Rogers, Sierra Club to VISTAS State Air Directors, “Significant Flaws in VISTAS Regional Haze CAMx Modeling and Methods; Recommendations to Develop Compliant State Implementation Plans” (May 12, 2021). (Enclosure 6)

	the Southeast over the last 5-10 years. This shift was not reflected in future predictions.	because the modeling inputs failed to properly identify EGUs and other point sources with large NO _x emissions as contributing to Class I area visibility impairment.
4	Used high thresholds and unnecessary filters to select sources to analyze for emission reducing measures.	Would result in an unreasonably low number of industrial sources selected by each state for an emission control reasonable progress four-factor analysis.

2. VISTAS’ High Thresholds and Flawed Methodology Excluded Polluting Facilities that Should be Addressed and Considered for Emission Reducing SIP Measures

By relying on the flawed VISTAS modeling to select which polluting sources to review for emission reductions, the Southeastern states plan to ignore hundreds of significant emission sources. According to NPCA’s analysis, by solely relying on the VISTAS’ approach North Carolina:

- Selected only three point sources affecting Class I sites. In contrast, NPCA identified 27 major industrial facilities in North Carolina that likely degrade visibility in 24 regional Class I Areas;
- Failed to require any further emission reduction measures from the three selected facilities;
- Is allowing 45,273 tons of NO_x and 36,313 tons of SO₂ emissions from major industrial sources to continue dirtying the air in our national parks and wilderness areas and communities;³⁵ and
- Ignores the fact that many of these major sources are located in communities of color and where many people live below the poverty line.

DAQ must revise its SIP to the extent it proposes to rely on these and other flawed methods discussed in these comments and in the May 12, 2021 letter.

B. DAQ Unreasonably Excluded Sources

In its proposed SIP, DAQ explains that it relied on the VISTAS approach, explaining that: “[f]or Class I areas in North Carolina, a total of 19 facilities exceeded the ≥1.00% PSAT threshold for sulfate only” but only “[t]hree of these facilities are located in North Carolina, and the NCDAQ requested four-factor analyses from those facilities for the reduction of SO₂ emissions.”³⁶

As discussed in detail in the Kordzi and Gebhart Reports, there are numerous issues with DAQ’s source selection methodology. For example:

³⁵ Emissions data was obtained from EPA’s 2017 National Emissions Inventory (NEI) and EPA’s 2019 Air Markets Data Program (AMPD) for power plants.

³⁶ PRE-HEARING DRAFT Regional Haze State Implementation Plan for North Carolina Class I Areas (2019 – 2028 Planning Period) at v.

- DAQ fails to address important contributors to visibility impairment at North Carolina’s Class I areas and as such, fails to generate “reasonable progress” toward the national goal of achieving natural visibility conditions.³⁷
- DAQ must assess nitrate.³⁸
- The 2028 projected emissions that DAQ relies on to rule out selecting coal-fired power plants are based on unsecured future assumptions.^{39, 40} Notably, DAQ relies on projections that show reduced emissions that are not assured. If DAQ intends to keep relying on these assumptions, it needs to make them a reality by incorporating retirements or other process changes into the SIP as enforceable requirements.
- DAQ must explain its decision to base its source selection on projected 2028 emissions instead of actual emissions.⁴¹
- The Fractional Bias Analysis presented by North Carolina was flawed as it was predicated on the unsubstantiated assumption that the PSAT modeling results were a true and accurate representation of the existing visibility impairment at North Carolina’s Class I areas.⁴² Additionally, use of the fractional bias calculation approach is suspect because when comparing the model’s output to observed values, DAQ did not use monitored or measured values for the observed values, and instead used the Area of Influence (AoI) values.⁴³ The “AoI values are not known values and are simply other predicted values...”⁴⁴
- DAQ does not provide a reasoned basis for using a 1.00% PSAT threshold for selecting facilities.⁴⁵
- DAQ’s reply to the FLM’s criticism of its source selection strategy is inadequate.⁴⁶

C. Source DAQ Wrongly Exempted from the Four-Factor Analysis Requirement and Should Have Required Controls for NO_x and SO₂

1. Duke Energy Carolinas, LLC, Marshall Steam Station

The Marshall Steam Station is fired by coal and located on Lake Norman in Catawba County. The 2,090 MW power plant has four coal-fired units. DAQ did not examine the four coal-fired units, despite the fact that the facility emits significant visibility impairing pollution. Upon evaluation, it is apparent that emission control systems are underperforming.⁴⁷ All four units are equipped with wet scrubbers⁴⁸ and “Units 1, 2 and 4 are

³⁷ *Gebhart October 2021 Report* at 1-3.

³⁸ *Kordzi Report* at 2.

³⁹ *Id.*

⁴⁰ *Gebhart October 2021 Report* at 5-6.

⁴¹ *Id.*

⁴² *Gebhart October 2021 Report* at 3-5

⁴³ *Id.* at 3-6

⁴⁴ *Id.* at 10.

⁴⁵ *Id.* at 8.

⁴⁶ *Id.*

⁴⁷ *Kordzi Report* at 15.

⁴⁸ *Id.*

equipped with SNCR systems and Unit 3 is equipped with a SCR system.”⁴⁹ The “wet scrubber systems on all four units are operated erratically, but during 2010 – 2011 have demonstrated the ability to continuously operate well below 0.10 lbs/MMBtu.”⁵⁰ While “during 2010 – 2011, the SNCR systems for Units 1, 2, and 4 appear to have previously operated at a lower NO_x level of approximately 0.20 lbs/MMBtu, with some months significantly below that level.”⁵¹ Similarly, “the SCR system for Unit 3 is operated very erratically, but has demonstrated the ability from 2010 – 2011 to consistently operate below 0.05 lbs/MMBtu.”⁵² Therefore, as the Kordzi Report explains:

Thus, without any capital upgrade cost (and likely minimal operating and maintenance costs), the Marshall units are quite capable of much better NO_x and SO₂ performance. It appears the only reason they do not is that they are not required by permit condition to do so. Additional reductions may also be possible with very moderate and likely cost-effective upgrades. NC DEQ should therefore have required—and should require—that the Marshall units undergo four-factor analyses.⁵³

To the extent DAQ relies on increased natural gas burning, that should be made practically enforceable in the SIP.

2. Duke Energy Carolinas, LLC, Belews Creek Steam Station

The Belews Creek Steam Station, bypassed by DAQ for a four factor analysis, is located on Belews Lake and the Dan River in Stokes County and is a 2,240 MW facility consisting of two nearly identical 1,120 MW units.⁵⁴ Both of the units have wet scrubbers and SCR systems to control pollutants.⁵⁵

DAQ’s 2028 SO₂ and NO_x emission projections from the Belews Creek Steam Station are significantly less than the facility emitted in 2020. However, DAQ fails to include any SIP emission limitations that would ensure that 2028 projections become reality. “NC DEQ should either base its projected 2028 emissions on historical data, or ensure that any significant deviations from historical data are made enforceable in the SIP.”⁵⁶

Additionally, similar to the underperformance of the wet scrubber and SCR systems at the Marshall coal-fired plant discussed above, the Belews Creek facility’s emission control systems are also underperforming.⁵⁷ As explained in the Kordzi Report:

Likely, the reason for the lax performance of these control systems is that Belews Creek’s permit doesn’t require better performance. Thus, very cost-effective controls are available for both units for likely just the increase in reagent, potentially better catalyst management and additional electricity for running all absorber pumps.⁵⁸

DAQ should require a four-factor analysis for this facility, investigate these issues and require reductions at this plant.

⁴⁹ *Id.*

⁵⁰ *Id.* at 18.

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.* at 19.

⁵⁷ *Id.* at 19-21.

⁵⁸ *Id.* at 21.

3. Duke Energy Progress, Roxboro Steam Electric Plant

The Roxboro Steam Electric Plant is a 2,422 MW coal-fired facility located on Hyco Lake in Semora and not selected for a four factor analysis. The plant consists of four units. As explained in the Kordzi Report, the units are controlled with Electrostatic Precipitators (ESPs) and SCR systems, but share a wet scrubber and a stack.⁵⁹ Neither DAQ’s projections for 2028 for NO_x nor SO₂ are based on historical data.⁶⁰ DAQ’s SIP projections for 2028 must either be based on historical emission data or made enforceable in the SIP.

Finally, both the wet scrubber and SCR systems are underperforming.⁶¹ For example, the SCR systems “all have demonstrated the ability to continuously operate at approximately 0.10 lbs/MMBtu,”⁶² and “[i]t is likely all the SCR systems could operate at 0.05 lbs/MMBtu on a monthly average basis, as discussed in the review of the Cardinal facility.”⁶³

DAQ should require a four-factor analysis for this facility, investigate these issues and require commensurate emission reductions.

4. Duke Energy Carolinas, LLC, Cliffside Steam Station Facility

The Cliffside facility is located in Cleveland and Rutherford counties and consists of two remaining coal-fired units: 621 MW and 910 MW, both of which are fitted with wet scrubbers and SCR systems to control emissions. Neither were evaluated for reasonable progress reductions. As discussed above for the other Duke Energy plants, there is a large discrepancy between the Cliffside actual historical emissions and DAQ’s projected 2028 emissions.⁶⁴ DAQ’s SIP projections for 2028 must either be based on historical emission data or made enforceable in the SIP.⁶⁵

Given the addition of natural gas to the station for both units, there is likely considerable room for emission reductions.⁶⁶ Moreover, both units have demonstrated the capacity to control SO₂ and NO_x below present levels.⁶⁷ Therefore, despite emission increases at one of the units, which is likely because the permit does not require better performance, cost-effective controls are likely available for these units.⁶⁸

DAQ should require a four-factor analysis for this facility, investigate these issues and require emission reductions at these units.

In recent years, the Cliffside, Marshall, and Belews Creek plants have been permitted to co-fire coal and natural gas in varying amounts. However, none of these plants are required to burn any minimum amount of natural gas. If DAQ ruled out four-factor analysis for these plants based on assumptions that they will increasingly burn natural gas instead of coal by 2028, those assumptions need to be made into enforceable requirements in the SIP.

⁵⁹ *Id.*

⁶⁰ *Id.* at 22.

⁶¹ *Id.* at 22-24.

⁶² *Id.* at 24.

⁶³ *Id.*

⁶⁴ *Id.* 24-25.

⁶⁵ *Id.*

⁶⁶ *Id.* at 26.

⁶⁷ *Id.*

⁶⁸ *Id.*

IV. DAQ's Reliance on the "Glide Path" Violates the Clean Air Act and Regional Haze Rule

DAQ attempts to justify deferring any further emission reductions for every major source in the state by pointing out that Class I areas appear to be trending below these area's glide path or URP, which DAQ suggests is sufficient to achieve reasonable progress.⁶⁹ EPA has made clear, however, that meeting or exceeding the URP does *not* obviate the need for states to conduct a robust analysis and making a technical demonstration that additional controls or emission reductions are not reasonable. "[A]n evaluation of the four statutory factors is required . . . regardless of the Class I area's position on the glidepath . . . the URP does not establish a 'safe harbor' for the state in setting its progress goals."⁷⁰ Rather, states must "determine what emission limitations, compliance schedules and other measures are necessary to make reasonable progress by considering the four factors" and must not reject "control measures determined to be reasonable" based on the degree of progress.⁷¹ Indeed, in its July 8, 2021 Memo, EPA reiterated that the uniform rate of progress is "not a safe harbor," and that it is not appropriate to reject cost-effective emission reductions on the basis that visibility in a particular Class I area is on the glide path. Instead, states are required to "evaluate and determine emission reduction measures that are necessary to make reasonable progress *by considering the four statutory factors*."⁷² Here, DAQ's decision to defer reasonable and cost-effective controls to another planning period, simply because Class I areas are on the glidepath, is contrary to the Clean Air Act and the Regional Haze Rule.

DAQ's "glide path" rationale is also misplaced because the agency failed to evaluate the Clean Air Act's reasonable progress factors in determining whether emission reductions may be necessary to ensure reasonable progress towards natural visibility in each Class I area that North Carolina sources affect, as required by the Regional Haze Rule.⁷³ Indeed, the Regional Haze Rule explicitly requires North Carolina to make meaningful reductions to ensure reasonable progress towards the national goal of restoring visibility. In so doing, North Carolina must provide a "robust demonstration," including documenting the criteria used to determine which sources or groups of sources were evaluated and how the four factors were taken into consideration. As discussed above, the Kordzi Report considers each of the sources with the greatest impacts at the Class I areas, and concludes that there are cost-effective control measures available, or at a minimum, that those facilities should have their emissions limits tightened to ensure current levels do not rise.

V. DAQ Improperly Refuses to Require Emission Reductions Based on Purported Emission Reductions from Existing Clean Air Act Programs.

DAQ relies heavily on the continued implementation of various air quality rules and programs to ensure reasonable progress.⁷⁴ DAQ's reliance on existing air quality programs is misplaced. First, as discussed above

⁶⁹ See, e.g., Proposed SIP at 231.

⁷⁰ 81 Fed. Reg. 66,331, 66,631 (Sept. 27, 2016); see also 81 Fed. Reg. 296, 326 (Jan. 5, 2016) (determining, as part of the reasonable progress federal implementation plan for Texas, "the uniform rate of progress is not a 'safe harbor' under the Regional Haze Rule."); EPA, Responses to Comments at 120, Promulgation of Air Quality Implementation Plans; State of Texas; Regional Haze and Interstate Visibility Transport Federal Implementation Plan: Best Available Retrofit Technology and Interstate Transport Provisions, EPA Docket No. EPA-R06-OAR-2016-6011 (June 2020) ("EPA has repeatedly and consistently taken the position that meeting a specific reasonable progress goal is not, itself, a "safe harbor," and does not relieve the state of the obligation to consider additional measures for reasonable progress. If it is reasonable to make more progress than the URP, a state must do so, as EPA explained in the 1999 regional haze rule) (citing 64 Fed. Reg. at 35732); see also 81 Fed. Reg. at 66,370 ("EPA's longstanding interpretation of the regional haze rule is that 'the URP does not establish a 'safe harbor' for the state in setting its progress goals.'" (quoting 79 Fed. Reg. 74818, 74834)).

⁷¹ 82 Fed. Reg. at 3093; see also 81 Fed. Reg. at 66,631.

⁷² EPA July 2021 Memo at 15-16 (emphasis added).

⁷³ See 40 C.F.R. § 51.308(f)(2) ("Each State must submit a long-term strategy that addresses regional haze visibility impairment for each mandatory Class I Federal area within the State *and for each mandatory Class I Federal area located outside the State that may be affected by emissions from the State.*") (emphasis added); *id.* § 51.308(f)(3)(ii)(A)-(B).

⁷⁴ See, e.g., Proposed SIP at 231.

and in the attached Kordzi Report, there are cost-effective pollution control measures that are readily achievable for many of North Carolina's sources. In fact, several of the sources are already capable of achieving on a continuous basis better emission rates than they are currently displaying. Second, reasonable progress requires that states consider the four statutory factors and adopt and include in their SIPs enforceable emission limitations to achieve reasonable progress toward the elimination of all anthropogenic pollution in Class I areas. This means that states must secure meaningful emission reductions that build on progress already achieved. There is an expectation that reductions are additive to ongoing and upcoming reductions under other CAA programs. Indeed, as EPA's July 2021 Memo makes clear:

[A] state should generally not reject cost-effective and otherwise reasonable controls merely because there have been emission reductions since the first planning period owing to other ongoing air pollution control programs or merely because visibility is otherwise projected to improve at Class I areas. More broadly, we do not think a state should rely on these two additional factors to summarily assert that the state has already made sufficient progress and, therefore, no sources need to be selected or no new controls are needed regardless of the outcome of four-factor analyses.⁷⁵

VI. DAQ Must Reconsider and Adapt Its SIP to Address Comments from the FLMs

The RHR and the CAA require that states consult with the FLMs that manage the Class I Areas impacted by a state's sources.⁷⁶ Because the FLMs' role is to manage their resources – including air quality – DAQ should meaningfully consider and adapt its SIP measures to address comments and suggestions from the FLMs.

DAQ has neither fully considered nor adapted its proposed SIP to reflect concerns raised and information received during FLM consultation. Representations at public meetings with stakeholders that the FLMs are satisfied with the DAQ's proposed SIP are contrary to the comments the NPS and Forest Service ("USFS" provided to the State.⁷⁷ The DAQ should reconsider the NPS and USFS comments and make changes to resolve the serious concerns these agencies raised. For example the NPS consultation explained that:

- "[S]ignificant additional progress is necessary before the ultimate visibility goal of no human caused visibility impairment is realized at Great Smoky Mountains NP. It is with this in mind that we provided SIP review feedback during our consultation call, summarized here.⁷⁸
- The NPS Air Resource Division's May 17, 2021, email to DAQ "outlined several concerns with the VISTAS and North Carolina analysis methods/approaches and outcomes in this round of SIP development. Our primary concerns relevant to the North Carolina draft SIP are the exclusion of NO_x from reasonable progress four-factor analyses and the screening thresholds used for source selection."⁷⁹

Regarding DAQ's proposed SIP approach to exclude NO_x emissions, the NPS explained that:

Ammonium nitrate from NO_x emissions is a significant anthropogenic haze causing pollutant. Over the past ten years the importance of ammonium nitrate on the 20% most-impaired days has increased for many Class I areas in the VISTAS region, including at Great Smoky Mountains NP. As SO₂ emissions

⁷⁵ EPA July 2021 Memo at 13.

⁷⁶ 40 C.F.R. § 51.308(i)(2).

⁷⁷ E.g., DAQ Remarks at the public hearing on October 6, 2021.

⁷⁸ Proposed SIP, Appendix H1-H3 at pdf 64, Cover email from Melanie Peters, NPS, to Randy Strait, DAQ (June 4, 2021)

⁷⁹ *Id.*

decline and the seasonality of most-impaired days shifts, NO_x emissions are increasingly important for many VISTAS Class I areas.⁸⁰

NPS took issue with DAQ's modeling approach, explaining that:

The North Carolina rationale for excluding NO_x emissions from reasonable progress four-factor analyses is based on an outdated modeling base year (2011) and associated inaccurate assumptions about the current and future distribution of most-impaired days in the modeling assessment. We recognize that the modeling methods follow EPA guidance and are technically correct, however the result is not representative of current conditions. The importance of ammonium nitrate and the distribution of most-impaired days has changed significantly since the 2011 base year. In 2011, ammonium sulfate-dominated extinction on the 20% most-impaired days which occurred mostly during the warmer, summer months. Currently, ammonium nitrate extinction which is highest during the cooler months of the year is now included among the 20% most-impaired days. As a result, 2028 projections based on the 2011 most-impaired days miss the importance of ammonium nitrate extinction. This is supported by the past five-years of IMPROVE monitoring data.⁸¹

The NPS' detailed recommendations for the errors in the draft SIP explain that:

The NPS recommends that North Carolina acknowledge more recent monitoring data in their source selection process and consider NO_x emission reduction opportunities as relevant to addressing regional haze during this planning period. Reducing NO_x emissions would have additional regional co-benefits for ozone and nitrogen deposition. Great Smoky Mountains NP is currently part of two limited maintenance plans for ozone and has 12 acidified streams on the Clean Water Act 303(d) list for pH-impaired surface waters from excessive atmospheric nitrogen and sulfur deposition. A total maximum daily load (TMDL) of nitrogen and sulfur deposition was established to restore these streams which will require additional nitrogen and sulfur reductions to reach these protective critical loads. While much of the region's NO_x emissions come from mobile sources, emissions inventories also show a significant quantity of NO_x emissions from point sources in North Carolina that could be addressed under the regional haze program.⁸²

The NPS also expressed serious concerns regarding DAQ's source selection methodology, putting the VISTAS states on notice in April 2020: this concern "stems from the screening thresholds used that resulted in the selection of very few sources for analysis and offers less protection for the more-impacted Class I areas."⁸³ The metric used by North Carolina, which relied on the VISTAS approach "used a two-part screening process. Both steps used an individual-facility-percent-of-total-impact screening metric. This type of metric biases the results against the more-visually-impacted Class I areas."⁸⁴ The NPS explains that:

*[S]ource impacts would have to be 80 times larger to identify a source for analysis in the most-visually-impaired VISTAS Class I area compared to the least-visually-impaired Class I area.*⁸⁵

NPS concludes by noting that its evaluation indicates that NO_x controls at Blue Ridge Paper Products and the Duke Energy sources could be improved. It advised "that North Carolina undertake or require full four-factor analysis on the six identified facilities to assess the NO_x control opportunities available in this planning period

⁸⁰ *Id.*

⁸¹ *Id.* at 64-65.

⁸² *Id.* at 65.

⁸³ *Id.* at 66.

⁸⁴ *Id.*

⁸⁵ *Id.* (emphasis added)

... including the “35–39% NO_x emission control efficiency achieved by the existing SNCR at Duke Energy Marshall Steam Station units 1, 2, and 4.”⁸⁶

Concerns expressed by the USFS echo those from the NPS. In particular, the USFS requested that “NC DAQ consider evaluating NO_x sources, along with SO₂ sources, for reasonable progress during this planning period.”⁸⁷

DAQ did not meaningfully consider the FLM comments, instead DAQ’s responses summarizes the process it followed, ignored many of the FLM comments, and provided responses that fail to take into consideration the requirements of the Act, regional haze rule and EPA’s direction to states.⁸⁸ For example, DAQ’s:

- Suggestion that further research is needed to understand the factors contributing to the nitrate fraction at the Class I areas (*e.g.*, emission sources, weather, and meteorology),⁸⁹ is unavailing.⁹⁰ DAQ’s responses as to why it ignored NO_x are also inconsistent with EPA’s direction.⁹¹
- Response to the FLM’s that its source selection process is consistent with EPA’s direction is misplaced. DAQ erroneously suggests EPA’s direction to states allows it to rely on its progress to date as an offramp.⁹² As discussed in Section IV. these comments, there is no “offramp” to the reasonable progress four-factor analysis requirement. Moreover, DAQ’s response to the FLMs failed to consider and apply EPA’s July 2021 Memo.⁹³
- Assertion that its source selection process was “superior to the Q/d approach” is simply wrong.⁹⁴ As explained by the NPS – and in these comments and the attached reports – DAQ’s source selection process is significantly flawed and does not follow the requirements of the Act, RHR and EPA’s directions to states. Moreover, despite DAQ’s SIP release *after* EPA’s July 2021 Memo, DAQ’s response to the FLM comments fails to take into consideration EPA’s direction on source selection.
- Misses the mark in responding to the FLMs comments regarding a four-factor analysis for NO_x at the five Duke Energy coal-fired power plants:
 - Duke Energy Carolinas, LLC - Belews Creek Steam Station,
 - Duke Energy Carolinas, LLC - Cliffside Steam Station,
 - Duke Energy Progress, LLC - Roxboro Steam Electric Plant,
 - Duke Energy Progress, LLC - Mayo Electric Generating Plant, and
 - Duke Energy Carolinas, LLC - Marshall Steam Station.

⁸⁶ *Id.* at 66-67.

⁸⁷ Draft SIP, Appendix H1-H3, Letter and Attachment from James E. Melonas, Forest Supervisor, Forest Service, U.S. Department of Agriculture, to Michael Abraczinskas Director, North Carolina Division of Air Quality, at pdf 100 (June 3, 2021)

⁸⁸ *Draft SIP Narrative*, Section 10.

⁸⁹ *Draft SIP Narrative* at 332.

⁹⁰ Furthermore, it is inappropriate for DAQ to suggest that its reliance on EPA’s agreement that using an outdated 2011 modeling platform was sufficient, since EPA’s final action and decision on SIPs does not come until after public comment and notice. Finally, if fund were not available to update the modeling platform, then DAQ should have selected methodology that could use the more recent modeling data.

⁹¹ *EPA July 2021 Memo* at 4. (“Consistent with the first planning period, EPA generally expects that each state will analyze sulfur dioxide (SO₂) and nitrogen oxide (NO_x) in selecting sources and determining control measures.” (citation omitted))

⁹² *Draft SIP Narrative* at 347 (“...for a given Class I area, it is reasonable for a state to select more sources for four-factor analysis if the Class I area is just below or at the URP, and to select fewer sources if the Class I area is well below the URP”).

⁹³ *EPA 2021 July Memo* at 16-17 (“Additional consultation and coordination requirements of the RHR provide states with important information and considerations from FLMs and other states relevant to the reasonable progress analysis.”)

⁹⁴ *Draft SIP Narrative* at 345.

DAQ erroneously asserts that all these facilities are “well controlled for NO_x” and that it is not reasonable to request the facilities conduct a four-factor analysis.⁹⁵ As explained by the FLMs and detailed in these comments and the attached reports, there are cost-effective options to improve on the current NO_x control technologies, which as EPA has explained, the state’s SIP should consider.⁹⁶

Contrary to the RHR requirement that the Federal Land Managers’ recommendations are to “meaningfully inform the State’s decisions on the long-term strategy,”⁹⁷ DAQ’s responses to the FLMs are unreasonable. The FLM consultation process is designed to inform development of the SIP, which has not occurred here.

VII. DAQ’s Analyses are Inconsistent with the Clean Air Act and Regional Haze Rule Requirements

The RP and technical analyses must be based on accurate information that is consistent with the Act and EPA’s implementing regulations. As discussed in the attached report by Joe Kordzi, and fully incorporated by reference into these comments, DAQ’s proposed analyses rely on inflated cost effectiveness analysis by using incorrect information for interest rate, equipment life, control efficiency, and retrofit and other factors. Furthermore, the proposed SIP unreasonably screened sources from the required four-factor analysis based on faulty assumptions regarding the effectiveness of current controls, and does not require sources to support suggested assumptions and proposed conclusions.

VIII. DAQ’s State-to-State Consultation Process was Inadequate

“Congress was clear that both downwind states (*i.e.*, “a State in which any [mandatory Class I Federal] area . . . is located) and upwind states (*i.e.*, “a State the emissions from which may reasonably be anticipated to cause or contribute to any impairment of visibility in any such area”) must revise their SIPs to include measures that will make reasonable progress at all affected Class I areas.”⁹⁸ “This consultation obligation is a key element of the regional haze program. Congress, the states, the courts and the EPA have long recognized that regional haze is a regional problem that requires regional solutions. *Vermont v. Thomas*, 850 F.2d 99, 101 (2d Cir. 1988).”⁹⁹ Congress intended this provision of the Clean Air Act to “equalize the positions of the States with respect to interstate pollution,” (S. Rep. No. 95-127, at 41 (1977)) and EPA’s interpretation of this requirement accomplishes this goal by ensuring that downwind states can seek recourse from EPA if an upwind state is not doing enough to address visibility transport.¹⁰⁰

In developing a long-term strategy for regional haze, EPA’s regulation 40 C.F.R. § 51.308(f)(2) requires that a state take three distinct steps: consultation; demonstration; and consideration. Specifically, the regulation requires:

(ii) The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated

⁹⁵ *Draft SIP Narrative* at 349.

⁹⁶ *EPA 2021 July Memo* at 4.

⁹⁷ 40 C.F.R. § 51.308(i)(2).

⁹⁸ 82 Fed. Reg. 3078, 3094 (Jan. 10, 2017).

⁹⁹ *Id.* at 3085.

¹⁰⁰ *Id.*

emission management strategies containing the emission reductions necessary to make reasonable progress.

(A) The State must demonstrate that it has included in its implementation plan all measures agreed to during state-to-state consultations or a regional planning process, or measures that will provide equivalent visibility improvement.

(B) The State must consider the emission reduction measures identified by other States for their sources as being necessary to make reasonable progress in the mandatory Class I Federal area.¹⁰¹

The RHR also requires that the

[P]lan revision ... must provide procedures for continuing consultation between the State ... on the implementation of the visibility protection program required by this subpart, including development and review of implementation plan revisions and progress reports, and on the implementation of other programs having the potential to contribute to impairment of visibility in mandatory Class I Federal areas.¹⁰²

In its 2017 amendments to the RHR EPA explained that “states must exchange their four-factor analyses and the associated technical information that was developed in the course of devising their long-term strategies. This information includes modeling, monitoring and emissions data and cost and feasibility studies.”¹⁰³ In the event of a recalcitrant state, “[t]o the extent that one state does not provide another other state with these analyses and information, or to the extent that the analyses or information are materially deficient, the latter state should document this fact so that the EPA can assess whether the former state has failed to meaningfully comply with the consultation requirements.”¹⁰⁴

A. DAQ Failed to Consult with Ohio

Although DAQ consulted with several states, there is nothing in the record demonstrating that North Carolina and Ohio exchanged their four-factor analyses and the associated technical information, including modeling, monitoring and emissions data and cost and feasibility studies, to determine whether additional emission reductions are necessary to ensure reasonable progress. DAQ failed to consult with Ohio about the coal-fired power plants that impact North Carolina’s Class I areas. Thus, it has failed to meet the RHR provision that requires that “[t]he State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area *to develop coordinated emission management strategies* containing the emission reductions necessary to make reasonable progress (emphasis added).”¹⁰⁵ In Ohio these coal-fired power plants include the Cardinal and Kyger plants, both of which have additional emission reductions that are cost effective.

¹⁰¹ 40 C.F.R. § 51.308(f)(2) (emphasis added); see also, 64 Fed. Reg. 35,765, 35,735 (July 1, 1999) (In conducting the four-factor analysis, EPA explained that “...the State must consult with other States which are anticipated to contribute to visibility impairment in the Class I area under consideration ... any such State must consult with other States before submitting its long-term strategy to EPA.”)

¹⁰² 40 C.F.R. § 51.308(f)(4).

¹⁰³ 82 Fed. Reg. at 3088 (emphasis added).

¹⁰⁴ *Id.*

¹⁰⁵ 40 C.F.R. § 51.308(f)(2)(ii)

1. Cardinal Power Plant

The SCR and wet scrubbers are underperforming at the Cardinal Power Plant.¹⁰⁶ “[I]t appears the only thing preventing the Cardinal units from achieving ... [the level] of SCR performance [it historically achieved] ... is the lack of an enforceable NO_x limit requiring it.”¹⁰⁷ While Ohio performed a four-factor analysis on the three Cardinal units, it wrongly concluded no controls were necessary. As detailed in the Korzi Report, it appears likely that additional NO_x reductions could be achieved very cost-effectively.¹⁰⁸ DAQ should have instructed Ohio at the front end of the SIP development process that controls were needed at Cardinal to protect North Carolina’s Class I areas. DAQ did not. Furthermore, in addition to NO_x, additional SO₂ reductions could be a matter of Cardinal simply running its scrubber systems at full capacity continuously or utilizing common scrubber upgrades.¹⁰⁹

DAQ should have requested a four-factor analysis and mitigations for the Cardinal Power Plant from Ohio.

2. Kyger Creek Power Plant

As explained in the Kordzi Report, it appears the “it appears the only thing preventing the Kyger Creek SCR units from consistently achieving this level of performance is the lack of an enforceable NO_x limit requiring it.”¹¹⁰ And “although Ohio performed a four-factor analysis on the Cardinal units, it wrongly concluded no controls were necessary”¹¹¹ For example, “simply running its SCR systems at full capacity all year round would likely be very cost-effective. Further SCR optimization may result in even more cost-effective controls.”¹¹² More SO₂ reduction could be a matter of Kyger Creek simply running its scrubber systems at full capacity continuously or utilizing common scrubber upgrades.¹¹³

DAQ should have requested a four-factor analysis and mitigations for the Kyger Power Plant from Pennsylvania.

B. DAQ Failed to Consult with Pennsylvania

DAQ also failed to consult with Pennsylvania and the impacts from the Seward Power Plant, which consists of two 262.5 MW units that fire waste coal from abandoned refuse piles in the area.¹¹⁴ The plant is also permitted to burn pet coke.¹¹⁵ Both units utilize circulating fluidized bed combustors, which use limestone to control SO₂ emissions, and are also equipped with Novel Integrated Desulfurization (NID) systems. Both units are also equipped with SNCR to control NO_x.¹¹⁶ As demonstrated in the graphs presented in the Kordzi Report,

¹⁰⁶ *Id.* at 26-31.

¹⁰⁷ *Id.* at 31.

¹⁰⁸ *Id.*

¹⁰⁹ *Id.*

¹¹⁰ *Id.* at 35.

¹¹¹ *Id.*

¹¹² *Id.*

¹¹³ *Id.*

¹¹⁴ *Id.* at 36.

¹¹⁵ *Id.*

¹¹⁶ *Id.*

[T]he NO_x and SO₂ controls for these units are not operated at a consistent level and are capable of better performance than recently exhibited. For instance, at multiple times, the SNCR systems have controlled NO_x to below 0.8 lbs/MMBtu, but typically operate much above that level. Also, in 2010 – 2012, the NID systems have controlled SO₂ to below 0.4 lbs/MMBtu but have gradually risen over time to approximately 0.6 lbs/MMBtu. Thus, without any capital upgrade cost (and likely minimal operating and maintenance costs), the Seward units are quite capable of much better NO_x and SO₂ performance. It appears the only reason they do not is that they are not required by a permit condition to do so. Additional reductions may also be possible with very moderate and likely cost-effective upgrades.¹¹⁷

DAQ should have requested a four-factor analysis and mitigations for the Seward Power Plant from Pennsylvania.¹¹⁸

IX. Even for Selected Sources, DAQ's SIP Falls Short

The technical analyses DAQ includes in the proposed SIP are flawed in numerous ways, as explained in detailed in the attached Kordzi Report. Once these flaws are corrected, it is clear that there are cost-effective controls and emission reductions measures from these sources that would ensure reasonable progress toward natural visibility in the Class I areas affected by North Carolina sources.

A. Blue Ridge Paper Product Canton Mill

DAQ should require that the Blue Ridge Paper Product (BRPP) Canton Mill perform a four-factor analysis for NO_x. There are significant unabated NO_x emissions from several units at BRPP and the facility is located only 16.9 km from the Shining Rock Wilderness Area.¹¹⁹ Considering these large NO_x emissions, DAQ should require that the BRPP perform a NO_x four-factor analysis.

For SO₂ emissions, DAQ should also investigate upgrades to the BRPP scrubbers to obtain additional SO₂ reductions. DAQ also needs to confirm BRPP's 2028 emission projections for SO₂, which as explained in the Kordzi report, are not documented and emission limits do not correlate to annual totals.¹²⁰ While BRPP has reduced SO₂ at the Mill,¹²¹ neither the company nor DAQ provide information demonstrating the installed/upgraded SO₂ controls are in fact operating at their peak efficiencies, which should be explored, documented and integrated as enforceable limits in the haze SIP.¹²² Because all the scrubbers are required to do performance testing, DAQ should present this information and assess the performance potential of upgrading

¹¹⁷ *Id.* at 36-37.

¹¹⁸ *Id.*

¹¹⁹ *Id.* at 38.

¹²⁰ *Id.*

¹²¹ *Id.* at 37 (explaining the BRPP described these reductions as follows, "BRPP has reduced its SO₂ emissions by thousands of tons since 2016. BRPP has shutdown or modified several major SO₂ emissions sources in order to reduce facility-wide SO₂ emissions. BRPP installed two new gas-fired package boilers and shut down its Big Bill and Peter G coal-fired boilers in 2017, resulting in a reduction in total SO₂ emissions of 2,300 tons per year (tpy). In late 2018, BRPP transitioned the Nos. 10 and 11 Recovery Furnaces from startup and shutdown on No. 6 fuel oil to startup and shutdown on ultra-low sulfur diesel, resulting in an SO₂ emissions reduction of 1,050 tpy. In the summer of 2018, BRPP commenced operation of a new wet scrubber on its Riley Coal Boiler and a new wet scrubber on its No. 4 Power Boiler. The addition of these control devices has resulted in a reduction of SO₂ emissions by 2,050 tpy from Riley Coal Boiler and 1,175 tpy from No. 4 Power Boiler. BRPP optimized the operation of the Riley Bark Boiler's wet scrubber to improve SO₂ emissions control and reduce actual emissions by about 600 tpy. BRPP also installed an SO₂ ambient monitor and completed an SO₂ modeling exercise to establish enforceable permit limits that will be incorporated into the State Implementation Plan (SIP) and ensure these SO₂ emissions reductions are permanent. Average 2014-2016 actual SO₂ emissions were approximately 7,600 tpy but actual 2019 SO₂ emissions were only 405 tons.")

¹²² *Id.* at 39.

the scrubbers, which may be as simple as using more caustic.¹²³ While BRPP asserts adding more caustic is not possible, its assertion is not documented – and with the performance testing data information DAQ has the information to ascertain whether BRPP’s assertion is correct.¹²⁴ Finally, DAQ should require that BRPP evaluate use of lower sulfur coal as part of its four-factor analysis.¹²⁵

Finally, the Kordzi Report discusses six issues with the analysis of installation of a DSI systems for the Riley and No. 4 Power Boilers, which was prepared to analyze additional SO₂ controls for these boilers. DAQ should address and document the questions raised, and correct the DSI cost analyses as necessary.¹²⁶

B. Domtar Plymouth Mill

DAQ should require that the Domtar Plymouth Mill perform a NO_x four-factor analysis. The Mill has a number of large NO_x sources and is located only 69 km from the Swanquarter Wilderness Area.¹²⁷ Given the proximity to the Class I area and significant NO_x emissions, DAQ must require a NO_x four-factor analysis to be completed.

There are a number of issues with how DAQ treats the SO₂ reasonable progress assessment Domtar submitted to DAQ for Hog Fuel Boilers Nos. 1 and 2 at the Mill. For Hog Fuel Boiler No. 1, DAQ makes numerous assertions regarding controls, and did not require a four-factor evaluation.¹²⁸ However, while DAQ admits none of the fuel restrictions or controls are enforceable in the SIP, it did not require a four-factor evaluation. DAQ must either require the four-factor analysis or include enforceable measures in the SIP.

DAQ’s refusal to require a wet scrubber on the No. 2 Hog Boiler is erroneously based on the low visibility benefits at the Swanquarter Wilderness Area.¹²⁹ The scrubber is cost-effective, at \$3,600/ton.¹³⁰ DAQ’s justification is improper in light of EPA’s recent clarification memo, which explains that “a state should not use visibility to summarily dismiss cost-effective potential controls.”¹³¹ EPA’s memo further indicates that if a state “has identified cost-effective controls for its sources but rejects most (or all) such cost-effective controls across those sources based on visibility benefits [the state] is likely to be improperly using visibility as an additional factor.”¹³² Because wet scrubbers satisfy an accurate four factor analysis, DAQ should require it at Hog Boiler No. 2 and include enforceable provisions in the SIP for limiting emissions.

As described in detail in the Kordzi Report, DAQ must revise its SIP to address various issues with the Domtar four-factor review. As a first order concern, DAQ should require that the entire facility be reviewed for a NO_x four-factor analysis. In addition, the No. 1 Hog Fuel Boiler should be reviewed for a SO₂ four-factor analysis, and a wet scrubber should be required on the No. 2 Hog Fuel Boiler, while increasing Domtar’s wet

¹²³ *Id.*

¹²⁴ *Id.*

¹²⁵ *Id.*

¹²⁶ *Id.* at 39-40.

¹²⁷ *Id.* at 42.

¹²⁸ As discussed DAQ’s *Draft SIP Narrative* at 292, “Since the boiler [No. 1] now burns only low-sulfur fuels, it is no longer a significant source of SO₂ emissions. These fuel restrictions and emissions decreases are not state or federally enforceable, but they can be used to inform a reasonable projection of the actual emission level for 2028. For this reason, No. 1 Hog Fuel Boiler is considered to be effectively controlled for SO₂ and was not included in the four-factor analysis evaluation.”

¹²⁹ *Id.*

¹³⁰ *Id.*

¹³¹ *EPA July 2021 Memo* at 13.

¹³² *Id.*

scrubber efficiency based on what is it capable of controlling. Lastly, DAQ should address a number of incorrect and undocumented information in the analysis.¹³³

C. PCS Phosphate Aurora Plant

DAQ fails to provide documentation and propose SIP emission limitations that reflect the projected 2018 SO₂ emissions.¹³⁴ For example, there are no calculations to verify the 2028 emission projections provided by the company; the company relies on a periodic catalyst replacement schedule of every three years and yet there are no enforceable requirements that cover this commitment; and the SO₂ emission limits are not proposed for inclusion in the SIP, rather, DAQ proposes relying on a consent decree (that will ultimately be discharged by the court).¹³⁵

The CAA requires states to submit implementation plans that “contain such emission limits, schedules of compliance and other measures as may be necessary to make reasonable progress toward meeting the national goal” of achieving natural visibility conditions at all Class I Areas.¹³⁶ The RHR requires that states must revise and update its regional haze SIP, and the “periodic comprehensive revisions must include the “enforceable emissions limitations, compliance schedules, and other measures that are necessary to make reasonable progress as determined pursuant to [51.308](f)(2)(i) through (iv).”¹³⁷ The emission limitations and other requirements of the RHR must be adopted into the SIP. Under the RHR, RPGs adopted by a state with a Class I area must be based only on emission controls measures that have been adopted and are enforceable in the SIP.¹³⁸ EPA’s Guidance explains that the requirements in 40 C.F.R. § 51.308(d)(3)(v)(F):

[R]equires SIPs to include enforceable emission limitations and/or other measures to address regional haze, deadlines for their implementation, and provisions to make the measures practicably enforceable including averaging times, monitoring requirements, and record keeping and reporting requirements.¹³⁹

These requirements were confirmed in EPA’s recent clarification memo.¹⁴⁰ Of significant concern to commenters is that contrary to these requirements, there is no enforceable requirement in the SIP that the plant

¹³³ *Id.* at 43-46.

¹³⁴ *Id.* at 47.

¹³⁵ *Id.*

¹³⁶ 42 U.S.C. §§ 7491(a)(1), (b)(2).

¹³⁷ 40 C.F.R. § 51.308(f)(2); 40 C.F.R. § 51.308(d)(3)(v)(F)(Enforceability of emission limitations and control measures).

¹³⁸ 40 C.F.R. § 51.308(f)(3).

¹³⁹ “EPA Guidance on Regional Haze State Implementation Plans for the Second Implementation Period,” at 42-43 (Aug. 20, 2019), https://www.epa.gov/sites/production/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf. (While NPCA filed a Petition for Reconsideration regarding EPA’s issuance of the 2019 Guidance (Enclosure 4), it does not dispute the information in the Guidance referenced here regarding enforceable limitations, which cite to EPA’s longstanding statements found in the “General Preamble for the Implementation of Title I of the Clean Air Act Amendments of 1990, 74 Fed. Reg. 13498 (April 16, 1992).

¹⁴⁰ *EPA July 2021 Memo* at 9 (“The existence of an enforceable emission limit or other enforceable requirement (e.g., a work practice standard or operational limit) reflecting a source’s existing measures may also be evidence that the source will continue implementing those measures. A federally enforceable and permanent requirement provides the greatest certainty and, therefore, is the preferred and best evidence. EPA will consider these and other types of limits and operational requirements as part of its weight-of-evidence evaluation. To be relevant, the limit should reflect the emission rate the source is actually achieving with its existing measures. A limit that is significantly higher than the emission rate a source is actually achieving does not keep the source from increasing its rate in the future. States should provide information on any enforceable emission limits associated with sources’ existing measures. States should also clearly identify the instrument in which the relevant limit(s) exist (by providing, e.g., the applicable permit number and where it can be found) and provide information on the specific permit provision(s) on which they are relying. If the instrument is not publicly available or readily accessible, a state should provide a copy of the instrument to EPA with its SIP submission.”)

will meet the 2028 SO₂ projections upon which DAQ proposes to rely.¹⁴¹ DAQ's SIP must include enforceable emission limitations that reflect the SO₂ projections and emission reductions.

X. The Proposed SIP Does Not Contain New Provisions to Ensure Emission Limitations are Permanent, Enforceable and Apply at All Times

Contrary to the technical analysis presented in the Kordzi Report demonstrating cost-effective controls at numerous sources, the proposed SIP does not include any new controls at any source.¹⁴² Moreover, DAQ's analysis in excluding coal-fired power plants from analysis assumes significant emission reductions by 2028 at those facilities. However, contrary to the requirements in the Act and regulations, as discussed elsewhere in these comments, DAQ fails to make those reductions enforceable in the SIP. Furthermore, DAQ relies the retirements to avoid the four factor analysis and further measures to reduce emissions. If DAQ is relying in any way on possible or projected operations changes or retirements at Duke Energy's coal plants – which appears to be the case – the agency needs to make sure those changes will actually happen by incorporating them into the SIP.

DAQ does propose including some permit provisions into the SIP,¹⁴³ however, those SIP provisions reflect existing limits and existing controls for the Domtar Paper Company in Plymouth, North Carolina and the PCS Phosphate plant located in Aurora, North Carolina – no new emission reductions are proposed.

XI. DAQ Should Analyze the Environmental Justice Impacts of its Regional Haze SIP, and Should Ensure the SIP Will Reduce Emissions and Minimize Harms to Disproportionately Impacted Communities

DAQ has both state and federal obligations to meaningfully consider and advance environmental justice in its regional haze SIP. Unfortunately, the draft SIP's cursory consideration of environmental justice falls short of these commitments.

A. Environmental Justice in North Carolina

“The Environmental Justice Program at [North Carolina's Department of Environmental Quality (DEQ)] ... works to ensure the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.”¹⁴⁴ DEQ's website explains that:

The challenge ahead of the department is integrating this perspective into the core mission of the department, along with the legal and scientific lens guiding how DEQ employees pursue their work now. DEQ's mission, 'Provide science-based environmental stewardship for the health and prosperity of all North Carolinians,' can only be accomplished if fighting for Environmental Justice is part of every DEQ activity.¹⁴⁵

¹⁴¹ *Id.*

¹⁴² *Draft SIP Narrative* at 298-299.

¹⁴³ *Draft SIP Narrative* at 300-304.

¹⁴⁴ North Carolina Environmental Quality, “Environmental Justice,” <https://deq.nc.gov/outreach-education/environmental-justice>.

¹⁴⁵ *Id.*

Congruent with these statements, the DEQ’s mission, and the summary of the DEQ’s “EJ Program” in the SIP Narrative,¹⁴⁶ the DAQ’s scientific and legal efforts supporting development and implementation of the regional haze program *must* provide for environmental stewardship for all North Carolinians, including those in environmental justice communities.

B. Consideration of Environmental Justice to Comply with Executive Orders

There are additional legal grounds for considering environmental justice when determining reasonable progress controls. Under the CAA, states are permitted to include in a SIP measures that are authorized by state law but go beyond the minimum requirements of federal law.¹⁴⁷ Ultimately, EPA will review the haze plan that North Carolina submits, and EPA will be required to ensure that its action on North Carolina’s haze plan addresses any disproportionate environmental impacts of the pollution that contributes to haze. Executive Orders in place since 1994, require federal executive agencies such as EPA to:

[M]ake achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations”¹⁴⁸

On January 27, 2021, the current Administration signed “Executive Order on Tackling the Climate Crisis at Home and Abroad.”¹⁴⁹ The new Executive Order on climate change and environmental justice amended the 1994 Order and provides that:

It is the policy of [this] Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy; ... protects public health ... delivers environmental justice ...[and that] ... [s]uccessfully meeting these challenges will require the Federal Government to pursue such a coordinated approach from planning to implementation, coupled with substantive engagement by stakeholders, including State, local, and Tribal governments.¹⁵⁰

DAQ should facilitate EPA’s compliance with these Executive Orders by considering environmental justice in its SIP submission.

¹⁴⁶ *Draft SIP Narrative* at 350.

¹⁴⁷ *See Union Elec. Co v. EPA*, 427 U.S. 246, 265 (1976) (“States may submit implementation plans more stringent than federal law requires and . . . the Administrator must approve such plans if they meet the minimum requirements of s 110(a)(2).”); *Ariz. Pub. Serv. Co. v. EPA*, 562 F.3d 1116, 1126 (10th Cir. 2009) (quoting *Union Elec. Co.*, 427 U.S. at 265) (“In sum, the key criterion in determining the adequacy of any plan is attainment and maintenance of the national air standards . . . ‘States may submit implementation plans more stringent than federal law requires and [] the [EPA] must approve such plans if they meet the minimum [Clean Air Act] requirements of § 110(a)(2).’”); *BCCA Appeal Group v. EPA*, 355 F.3d 817, 826 n. 6 (5th Cir. 2003) (“Because the states can adopt more stringent air pollution control measures than federal law requires, the EPA is empowered to disapprove state plans only when they fall below the level of stringency required by federal law.”)

¹⁴⁸ Exec. Order No. 12898, § 1-101, 59 Fed. Reg. 7629 (Feb. 16, 1994), as amended by Exec. Order No. 12948, 60 Fed. Reg. 6381 (Feb. 1, 1995).

¹⁴⁹ Exec. Order No. 14008, 86 Fed. Reg. 7619 (Jan. 27, 2021).

¹⁵⁰ *Id.* at § 201.

C. EPA’s Regional Haze Guidance and Clarification Memo for the Second Implementation Period

EPA’s 2021 Clarification Memo directs states to take into consideration environmental justice concerns and impacts in issuing any SIP revision for the second planning period.¹⁵¹ EPA’s 2019 Regional Haze Guidance for the Second Planning Period specifies, “States may also consider any beneficial non-air quality environmental impacts.”¹⁵² This includes consideration of environmental justice in keeping with other agency policies. For example, EPA also pointed to another agency program that states could rely upon for guidance in interpreting how to apply the non-air quality environmental impacts standard.¹⁵³

When there are significant potential non-air environmental impacts, characterizing those impacts will usually be very source- and place-specific. Other EPA guidance intended for use in environmental impact assessments under the National Environmental Policy Act may be informative, but not obligatory to follow, in this task.

A collection of EPA policies and guidance related to the National Environmental Policy Act (“NEPA”) is available at <https://www.epa.gov/nepa/national-environmental-policy-act-policies-and-guidance>. One of these policies concerns Environmental Justice.¹⁵⁴ North Carolina should consider these sources in conducting a meaningful environmental justice analysis.

D. DAQ’s Environmental Justice Analysis is Inadequate

While we appreciate DAQ’s efforts to prepare an environmental justice analysis, it falls short. DAQ’s proposed SIP explains that it overlaid the State’s Class I areas with maps of potentially underserved block groups, which was then used to inform the specific EJ focused outreach for the RH program.¹⁵⁵ While this is a useful first step, DAQ must do more.

DAQ must involve and consider the environmental justice communities impacted by harms from the reasonable progress sources. DAQ’s SIP ignores the fact that many of the reasonable progress sources are located in communities of color and many live below the poverty line. For example, PCS Phosphate Company (Aurora) and Domtar Paper Company are located in vulnerable areas where the people of color is higher than 64% and the percentage of poverty rate is higher than 30%.

E. EPA has a Repository of Material Available for Considering Environmental Justice

In addition to the NEPA guidance materials referenced above, EPA provides a wealth of additional material.¹⁵⁶ The most important aspect of assessing Environmental Justice is to identify the areas where people

¹⁵¹ EPA July 2021 Memo at 16.

¹⁵² EPA 2019 RH Guidance at 49.

¹⁵³ *Id.* at 33.

¹⁵⁴ See, EPA Environmental Justice Guidance for National Environmental Policy Act Reviews, <https://www.epa.gov/nepa/environmental-justice-guidance-national-environmental-policy-act-reviews>.

¹⁵⁵ Draft SIP Narrative at 351. DAQ also includes two reports from EPA’S EJSCREEN tool, a one-mile radius around the Shining Rock Wilderness Area, and a one-mile radius around the Swanquarter Wilderness Area.

¹⁵⁶ See, EPA: Learn About Environmental Justice, <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>. (Enclosure 7)

are most vulnerable or likely to be exposed to different types of pollution. EPA’s EJSCREEN tool can assist in that task. It uses standard and nationally consistent data to highlight places that may have higher environmental burdens and vulnerable populations.¹⁵⁷

F. EPA Must Consider Environmental Justice

As occurred in the first planning period, if a state fails to submit its SIP on time, or if EPA finds that all or part of a state’s SIP does not satisfy the Regional Haze regulations, then EPA must promulgate its own Federal Implementation Plan to cover the SIP’s inadequacy (“FIP”). Should EPA promulgate a FIP that reconsiders a state’s four-factor analysis, it is completely free to reconsider any aspect of that state’s analysis. The two Presidential Executive Orders referenced above require that federal agencies integrate Environmental Justice principles into their decision-making. EPA has a lead role in coordinating these efforts, and recently EPA Administrator Regan directed all EPA offices to clearly integrate environmental justice considerations into their plans and actions.¹⁵⁸ Consequently, should EPA promulgate a FIP, it has an obligation to integrate Environmental Justice principles into its decision-making. The non-air quality environmental impacts of compliance portion of the third factor, is a pathway for doing so.

Consistent with legal requirements and government efficiency, we urge DAQ to take impacts to EJ communities, into consideration as it evaluates or reevaluates sources identified above that emit that visibility impairing pollution.

G. DAQ Must Consider Environmental Justice under Title VI of the Civil Rights Act

As EPA must consider Environmental Justice, so must the Department of Environmental Quality’s DAQ and all other entities that accept Federal funding. Under Title VI of the Civil Rights Act of 1964, “no person shall, on the ground of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity...”. DAQ has an obligation to ensure the fair treatment of communities that have been environmentally impacted by sources of pollution. That means going beyond the current analysis conducted to inform the “meaningful involvement” of impacted communities; environmental justice also requires the “fair treatment” of these communities in the development and implementation of agency programs and activities, including those related to the SIP.

DAQ should conduct a thorough analysis of the current and potential effects to impacted communities from sources considered in the SIP as well as those facilities identified by commenters and other stakeholders but not reviewed by DAQ. By not conducting this analysis and including the benefits of projected decline in emissions to these communities in their determination of the included emission sources, DEQ/DAQ is not fulfilling its obligations under the law. Moreover, the state is making a mockery of Title VI by not using the SIP requirements to bring about the co-benefits of stronger reductions measures and reduce harms based on continued emissions.

¹⁵⁷ See, EPA EJSCREEN: Environmental Justice Screening and Mapping Tool, Additional Resources and Tools Related to EJSCREEN, <https://www.epa.gov/ejscreen/additional-resources-and-tools-related-ejscreen>.

¹⁵⁸ See, EPA News Release, EPA Administrator Announces Agency Actions to Advance Environmental Justice, *Administrator Regan Directs Agency to Take Steps to Better Serve Historically Marginalized Communities* (April 7, 2021), <https://www.epa.gov/newsreleases/epa-administrator-announces-agency-actions-advance-environmental-justice>. (Enclosure 8)

Consistent with legal requirements and government efficiency, we urge DAQ to take impacts to EJ communities, into consideration as it evaluates or reevaluates sources identified above that emit that visibility impairing pollution.

Conclusion

We urge DAQ to reevaluate its proposed SIP in light of these comments and EPA's July 8, 2021 Memo, which confirms that the proposed SIP is fundamentally flawed. Due to the deficiencies outlined above and in the attached reports, the state must revise and reissue a valid haze SIP for public notice and comment. Please do not hesitate to contact us with any questions or to discuss the matters raised in these comments.

Sincerely,



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Enclosures

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List of Enclosures

1. Kordzi, Joe, “A Review of the North Carolina Regional Haze State Implementation Plan,” (Oct. 2021).
2. Gebhart, D. Howard, “Technical Review of North Carolina Regional Haze State Implementation Plan Second Round of Regional Haze State Implementation Plans Supplemental Report” (Oct. 2021).
3. Gebhart, D. Howard, “Technical Review of VISTAS Visibility Modeling for the Second Round of Regional Haze State Implementation Plans” (May 2021).
4. “Petition for Reconsideration of Guidance on Regional Haze State Implementation Plans for the Second Implementation Period,” submitted by National Parks Conservation Association, Sierra Club, Natural Resources Defense Council, Coalition to Protect America's National Parks, Appalachian Mountain Club, Western Environmental Law Center and Earthjustice, to former EPA Administrator Andrew Wheeler (May 8, 2020).
5. EPA Memorandum, from Peter Tsigotis, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors, “Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period,” (July 9, 2019), <https://www.epa.gov/visibility/clarifications-regarding-regional-haze-state-implementation-plans-second-implementation>.
6. Letter from Stephanie Kodish, NPCA, Leslie Griffith, SELC, and David Rogers, Sierra Club to VISTAS State Air Directions, “Significant Flaws in VISTAS Regional Haze CAMx Modeling and Methods; Recommendations to Develop Compliant State Implementation Plans” (May 12, 2021).
7. EPA: Learn About Environmental Justice, <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>.
8. EPA News Release, EPA Administrator Announces Agency Actions to Advance Environmental Justice, *Administrator Regan Directs Agency to Take Steps to Better Serve Historically Marginalized Communities* (April 7, 2021), <https://www.epa.gov/newsreleases/epa-administrator-announces-agency-actions-advance-environmental-justice>.
9. D. Howard Gebhart, “Testimony of Howard Gebhart on Behalf of NPCA and Other Conservation Organizations” (Oct. 6, 2021).
10. Ulla Reeves, Senior Advocacy Manager in the Clean Air Program of the NPCA, “Testimony of Ulla Reeves on Behalf of NPCA” (Oct. 6, 2021).

Enclosure 1

A Review of the North Carolina Regional Haze State Implementation Plan

Prepared by

Joe Kordzi, Consultant

On behalf of

**National Parks Conservation Association
Sierra Club
CleanAire NC
Southern Environmental Law Center**

October 2021

Table of Contents

Executive Summary	v
1 General	1
1.1 NC DEQ should Improve its Source Data Gathering.....	1
1.2 NC DEQ’s Documentation is Lacking	1
1.3 NC DEQ Should Have Considered Area Sources	1
2 NC DEQ’s Source Selection is Highly Flawed.....	2
2.1 NC DEQ Should have Assessed Nitrate.....	2
2.2 NC DEQ’s 2028 Projected Emissions are Based on Unsecured Future Assumptions	3
2.3 NC DEQ’s PSAT Source Selection Methodology is Flawed.....	6
2.4 NC DEQ’s Reply to FLMs Criticism of its Source Selection Strategy is not Adequate...	8
2.5 NC DEQ’s PSAT Threshold is not Supported	8
2.6 NC DEQ’s PSAT - AoI Correlation is a Misinterpretation of the Data	9
2.7 NC DEQ’s PSAT Documentation Should be Updated.....	12
2.8 NC DEQ’s Reasoning for not Selecting Duke Energy Sources is Flawed.....	13
3 NC DEQ Wrongly Ignored Likely Cost-Effective Controls	13
3.1 NC DEQ Should have Examined the Marshall Facility for Upgrades to NO _x and SO ₂ Controls	15
3.2 NC DEQ Should have Examined the Belews Creek Facility for Upgrades to NO _x and SO ₂ Controls.....	18
3.3 NC DEQ Should have Examined the Roxboro Facility for Upgrades to NO _x and SO ₂ Controls	21
3.4 NC DEQ Should have Examined the Cliffside Facility for Upgrades to NO _x and SO ₂ Controls	24
3.5 NC DEQ Should have Objected to Ohio not Improving Controls at the Cardinal EGU.	26
3.6 NC DEQ Should have Objected to Ohio not Improving Controls at the Kyger Creek EGU.....	31
3.7 NC DEQ Should have Objected to Pennsylvania not Improving Controls at the Seward EGU.....	35
4 Review of the Blue Ridge Canton Mill Four-Factor Analysis	37
4.1 NC DEQ should require that the BRPP Canton Mill perform a NO _x four-factor analysis	37
4.2 NC DEQ Should Confirm BRPP’s 2028 SO ₂ Projections.....	38
4.3 NC DEQ Should Investigate Upgrades to BRPP’s Scrubbers.....	39
4.4 NC DEQ Should Confirm or Correct Aspects of BRPP’s DSI Cost Analyses	39
5 Review of the Domtar Plymouth Mill Four-Factor Analysis.....	41
5.1 NC DEQ Should Revisit its SO ₂ Control Assumption for the No. 1 Hog Boiler.....	41
5.2 NC DEQ should Require the Domtar Plymouth Mill Perform a NO _x four-factor Analysis	41
5.3 NC DEQ Should Require a Wet Scrubber on Domtar Plymouth Mill’s No. 2 Hog Boiler	42
5.4 NC DEQ Should Increase Domtar’s Wet Scrubber Efficiency	43

5.5	There are a number of Apparently Incorrect or Undocumented Charges in Domtar’s Wet Scrubber Cost Analysis	43
6	Review of the PCS Phosphate Aurora Plant.....	46
6.1	NC DEQ Should not Assume Unsecured SO ₂ Reductions.....	46
7	Apparent Errata	48

List of Figures

Figure 1.	NC DEQ’s Figure 7-77: Ratio of AoI/PSAT % Contributions for Sulfate as a Function of Distance from the Facility to the Class I Area.....	9
Figure 2.	NC DEQ’s Figure 7-78: Fractional Bias for Sulfate as a Function of Distance from the Facility to the Class I Area.....	10
Figure 3.	Marshall Unit 1 Historical SO ₂ and NO _x Monthly Emissions.....	16
Figure 4.	Marshall Unit 2 Historical SO ₂ and NO _x Monthly Emissions.....	16
Figure 5.	Marshall Unit 3 Historical SO ₂ and NO _x Monthly Emissions.....	17
Figure 6.	Marshall Unit 4 Historical SO ₂ and NO _x Monthly Emissions.....	17
Figure 7.	Belews Creek Unit 1 Historical SO ₂ and NO _x Monthly Emissions.....	20
Figure 8.	Belews Creek Unit 2 Historical SO ₂ and NO _x Monthly Emissions.....	20
Figure 9.	Roxboro Unit 1 Historical SO ₂ and NO _x Monthly Emissions.....	22
Figure 10.	Roxboro Unit 2 Historical SO ₂ and NO _x Monthly Emissions.....	23
Figure 11.	Roxboro Unit 3B Historical SO ₂ and NO _x Monthly Emissions	23
Figure 12.	Roxboro Unit 4B Historical SO ₂ and NO _x Monthly Emissions	24
Figure 13.	Cliffside Unit 5 Historical SO ₂ and NO _x Monthly Emissions.....	25
Figure 14.	Cliffside Unit 6 Historical SO ₂ and NO _x Monthly Emissions.....	26
Figure 15.	Cardinal Unit 1 Monthly Average SO ₂ and NO _x emissions.....	27
Figure 16.	Cardinal Unit 2 Monthly Average SO ₂ and NO _x emissions.....	28
Figure 17.	Cardinal Unit 3 Monthly Average SO ₂ and NO _x emissions.....	28
Figure 18.	Cardinal Unit 1 Historical 30 Boiler Operating Day (BOD) NO _x Performance	30
Figure 19.	Cardinal Unit 1 Selected Historical 30 BOD NO _x Performance	30
Figure 20.	Kyger Creek Unit 1 Recent Monthly Average SO ₂ and NO _x emissions	32
Figure 21.	Kyger Creek Unit 3 Recent Monthly Average SO ₂ and NO _x emissions	33
Figure 22.	Kyger Creek Unit 1 Historical Monthly NO _x Emissions.....	34
Figure 23.	Seward Unit 1 Historical SO ₂ and NO _x Monthly Emissions.....	36

List of Tables

Table 1.	Cliffside Recent SO ₂ Annual Emissions.....	5
Table 2.	Cliffside Recent NO _x Annual Emissions	5
Table 3.	Belews Creek Recent SO ₂ Annual Emissions	19
Table 4.	Belews Creek Recent NO _x Annual Emissions.....	19
Table 5.	Roxboro Recent SO ₂ and NO _x Annual Emissions.....	21
Table 7.	Kyger Creek Unit 1 Pre-SCR Average Monthly NO _x Rates.....	34
Table 8.	Blue Ridge Paper Products Canton Mill Historic NO _x Emissions (tons)	38

Table 9. Comparison of BRPP Canton Mill 2028 SO ₂ Projections (tons)	38
Table 10. Domtar Plymouth Mill Historic NO _x Emissions (tons)	42
Table 11. Revised Domtar Wet Scrubber Cost-Effectiveness	45

Executive Summary

This is a report concerning a review of the North Carolina Regional Haze State Implementation Plan (SIP).¹ Emissions and controls information for all EGUs were downloaded from EPA's Air Markets Program Data (AMPD) website.² Additional information was obtained from the Energy Information Agency (EIA).³ Lastly, the most recently issued Title V operating permits for a number of units were reviewed.

This report indicates that the North Carolina Regional Haze State Implementation Plan (SIP) is significantly flawed in a number of areas. The most significant flaws include the following:

- The SIP only addresses visibility impairment from sulfate. Although sulfate does indeed dominate visibility impairment at all of North Carolina's Class I Areas, nitrate also contributes and a number of likely cost-effective NO_x controls are available and should have been examined.
- North Carolina wrongly uses the visibility progress achieved at its Class I Areas as a safe harbor against additional cost-effective controls.
- North Carolina's source selection process is flawed, as it resulted in few sources to examine for four-factor analyses. Much of this is due to the SIP's selection threshold and its exclusive reliance on Particulate Source Apportionment Technology (PSAT).
- North Carolina bases its modeling and control cost analyses on 2028 emission projections. In some cases, these emissions projections are much less than historical and current source emissions. In these cases, either more current emissions should have been used, or these assumed reductions should have been secured by enforceable commitments that were made a part of the SIP.
- North Carolina ignored likely cost-effective controls, mainly in the form of upgrades to Selective Catalytic Reduction (SCR) and scrubber systems at Electricity Generating Units (EGUs) located in North Carolina, and via the consultation process, in other states.
- The SIP suffers from a general lack of documentation, especially in its control cost analyses.

These flaws make it evident that the North Carolina Regional Haze SIP does not comply with the Regional Haze Rule in a number of key areas and must be revised.

¹ <https://deq.nc.gov/about/divisions/air-quality/air-quality-planning/state-implementation-plans/regional-haze-state-sip>.

² See <https://ampd.epa.gov/ampd/>. This information is compiled and assessed in spreadsheets that are included in this analysis.

³ See <https://www.eia.gov/electricity/data/eia923/>.

1 General

1.1 NC DEQ should Improve its Source Data Gathering

In preparation for this report, on July 18, 2021, the following request was made to the North Carolina Department of Environmental Quality (NC DEQ) through North Carolina's public records request process:

- (1) Documents in electronic format (spreadsheets, databases and the like) containing the unit-specific annual and/or monthly SO₂, NO_x, and particulate matter of all non-EGU stationary sources of pollution in North Carolina for the most current and the prior four years. Please note that I am requesting the information on a unit-specific basis.
- (2) Any information that summarizes the types of pollution controls currently installed on the units for which the emissions are provided.

On July 29, 2021, NC DEQ provided a partial response to Part (1). However, the provided spreadsheets contain formatting issues (e.g., numbers entered as text and improperly merged cells) that make it very difficult to properly analyze the data. Also, some of the data (e.g., Blue Ridge Paper Products Canton Mill) is inconsistent with that in NC DEQ's SIP. It is suggested that NC DEQ improve its data gathering and warehousing for its sources.

1.2 NC DEQ's Documentation is Lacking

Little documentation has been provided to support a number of assertions contained in some cost-effectiveness calculations. For those cost-analyses that do not employ Control Cost Manual approved algorithms or cost models, adequate documentation (e.g., vendor quotes, actual costs from a similar facility, generally accepted estimates) should be provided to support any of the capital control costs. It is assumed the NC DEQ has procedures to protect confidential business information, should that be asserted.

1.3 NC DEQ Should Have Considered Area Sources

Section 40 CFR 51.308(f)(2)(i) indicates that states should consider evaluating major and minor stationary sources or groups of sources, mobile sources, and area sources. NC DEQ barely mentions area (nonpoint) sources, only describing how its inventories were developed. However, Table 4-2 indicates that nonpoint sources are significant contributors to North Carolina's NO_x and SO₂ 2011 state inventory. Tables 7-15 through 7-19 indicate that nonpoint sources are often the second leading SO₂ source type contributor and the third leading NO_x source type contributor to North Carolina's Class I Areas. It is not apparent how NC DEQ satisfies section 51.308(f)(2)(i), when there does not appear to be any real consideration of how nonpoint sources could be analyzed and potentially controlled.

2 NC DEQ's Source Selection is Highly Flawed

2.1 NC DEQ Should have Assessed Nitrate

In Section 7.8.1, NC DEQ indicates that for the three facilities it identified for four-factor analyses,⁴ it only requested that the facilities assess SO₂. NC DEQ bases this position on the fact that SO₂ is the predominant visibility impairing pollutant for North Carolina Class I Areas, as evidenced by modeling information it has presented such as summarized in Figures 6-17 to 6-31. These figures do indeed indicate that SO₂ is the predominant anthropogenic visibility impairing pollutant. However, NC DEQ also states the following on page 113:

Unlike the data for the baseline period of 2000 to 2004, where nearly all days with poor visibility were heavily dominated by sulfate impairment, the 2014 to 2018 data show some 20% most impaired days having large organic matter or nitrate impacts at North Carolina's Class I areas. The organic matter components on poor visibility days are associated with episodic events while the nitrate components are associated with anthropogenic emissions.

Despite this clear evidence that nitrate impacts are increasing, NC DEQ has passed up many opportunities to require that sources perform NO_x four-factor analyses. In fact, Table 7-7 indicates that, excluding mobile sources, EGUs are the largest source of NO_x in North Carolina. As is detailed in a number of comments later in this report, many opportunities are cited that concern EGUs that already have installed the best NO_x control available—SCR systems. In every case, these EGU SCR systems have previously demonstrated an ability to control NO_x to a much higher level than they are currently achieving. The only apparent reason for this lax performance is that NC DEQ's permits do not require them to perform better. Thus, the "control" that would be evaluated would likely involve little to no capital expense, since the infrastructure is already present. Instead, the costs that would be evaluated may well be confined to additional reagent and perhaps better catalyst management.

On page 348, the NPS states that they recommended the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) EWRT*Q/d approach to source ID, which would have brought in an additional 5 Duke facilities into consideration. The NPS specifically noted:

However, our initial evaluation indicates that NO_x controls at these facilities could be improved. Specifically, we recommend that North Carolina evaluate options to improve on the current NO_x control efficiencies, especially the 35–39% NO_x emission control efficiency achieved by the existing SNCR at Duke Energy Marshall Steam Station units 1, 2, and 4. There were existing NO_x

⁴ Throughout this report, a "four-factor" analysis is a short hand reference to the requirements under 40 CFR 51.308(f)(2)(i): "The State must evaluate and determine the emission reduction measures that are necessary to make reasonable progress by considering the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and the remaining useful life of any potentially affected anthropogenic source of visibility impairment."

controls associated with these units when the SNCR was added. This percent control efficiency represents the additional control efficiency that the SNCR contributed. These numbers do not represent the overall control efficiency associated with these units.

EPA's recent Clarification Memo establishes an expectation that states will minimally consider SO₂ and NO_x, absent strong documentation such consideration would be unreasonable.⁵ As indicated in this report, it would have been relatively easy to identify opportunities to reduce NO_x, making NO_x consideration more than reasonable. NC DEQ should have included NO_x in its overall visibility strategy and (the problems relating to its use and interpretation of PSAT aside) required all sources that underwent four-factor analyses to do so for both SO₂ and NO_x. In addition, NC DEQ should have, regardless of the Area of Influence (AoI) and PSAT results and/or their interpretation, taken advantage of the low hanging fruit presented to them and assessed EGUs for SCR system upgrades. These upgrades are very likely to be very cost-effective.

2.2 NC DEQ's 2028 Projected Emissions are Based on Unsecured Future Assumptions

Beginning on page 178, NC DEQ discusses its strategy for ranking sources that impact the visibility of its Class I Areas. NC DEQ indicates that it used 2028 emission projections for its AoI analysis, consistent with the Regional Haze Guidance. However, the Regional Haze Guidance also cautions states regarding the use of 2028 emissions. For instance, it states:⁶

Generally, the estimate of a source's 2028 emissions is based at least in part on information on the source's operation and emissions in a representative historical period. However, there may be circumstances under which it is reasonable to project that 2028 operations will differ significantly from historical emissions. Enforceable requirements are one reasonable basis for projecting a change in operating parameters and thus emissions; energy efficiency, renewable energy, or other such programs where there is a documented commitment to participate and a verifiable basis for quantifying any change in future emissions due to operational changes may be another. A state considering using assumptions about future operating parameters that are significantly different than historical operating parameters should consult with its EPA Regional office.

Since it used projected 2028 emissions in lieu of actual emissions, NC DEQ has based its source selection strategy on unsecured assumptions of future emission profiles. EPA cautions states against this practice in its Clarification Memo:⁷

⁵ Memorandum from Peter Tsigotis, Dir., EPA, to Reg'l Air Dirs., Regions 1–10 (July 8, 2021), hereafter referred to as the "Clarification Memo," available here: <https://www.epa.gov/visibility/clarifications-regarding-regionalhaze-state-implementation-plans-second-implementation>. See page 4.

⁶ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period, EPA-457/B-19-003, August 2019." Hereafter referred to as the "Regional Haze Guidance." Page 17.

⁷ Clarification Memo. See page 9.

Information on a source’s past performance using its existing measures may help to inform the expected future operation of that source. If either a source’s implementation of its existing measures or the emission rate achieved using those measures has not been consistent in the past, it is not reasonable to assume that the source’s emission rate will remain consistent and will not increase in the future [emphasis added]. To this end, states should include data for a representative historical period demonstrating that the source has consistently implemented its existing measures and has achieved, using those measures, a reasonably consistent emission rate. For most sources, data from the most recent 5 years (if available) is sufficient to make this showing. Information pertinent to a source’s implementation of its existing measures going forward is also critical to a state’s demonstration. States should provide data and information on the source’s projected emission rate (e.g., for 2028), including assumptions and inputs to those projections. States should justify those assumptions and inputs and explain why it is reasonable to expect that the source’s emission rate will not increase in the future.

To the extent that a state declines to evaluate additional pollution controls for any source based on that source’s planned retirement or decline in utilization, it must incorporate those operating parameters or assumptions as enforceable limitations in the second planning period SIP. The Clean Air Act requires that “[e]ach state implementation plan . . . *shall*” include “enforceable limitations and other control measures” as necessary to “meet the applicable requirements” of the Act. 42 U.S.C. § 7410(a)(2)(A). The Regional Haze Rule, under Section 51.308(d)(3) similarly requires each state to include “enforceable emission limitations” as necessary to ensure reasonable progress toward the national visibility goal. Moreover, under EPA’s guidance document for the second planning period, states cannot rely on a source’s remaining useful life to avoid conducting a four-factor analyses unless the source has “an enforceable commitment to be retired or replaced by 2028.”⁸ This is consistent with EPA’s longstanding approach to control determinations under the mandatory BART Guidelines.⁹ Thus, consistent with EPA’s past practice, the agency’s regulations, and the requirements of the Clean Air Act itself, North Carolina cannot simply decline to evaluate additional cost-effective controls for a source that intends to retire or reduce operations unless those operating parameters are included as enforceable limitations in the second planning period SIP.

⁸ Guidance on Regional Haze State Implementation Plans for the Second Implementation Period, EPA-457/B-19-003 August 2019. See page 22. Also see page 34: “To the extent such a requirement is being relied upon for a reasonable progress determination, the measure would need to be included in the SIP and/or be federally enforceable. See 40 CFR 51.308(f)(2).”

⁹ 70 FR 39167 (July 6, 2005): “When you project that future operating parameters (e.g., limited hours of operation or capacity utilization, type of fuel, raw materials or product mix or type) will differ from past practice, and if this projection has a deciding effect in the BART determination, then you must make these parameters or assumptions into enforceable limitations. In the absence of enforceable limitations, you calculate baseline emissions based upon continuation of past practice.”

Therefore, NC DEQ should either have based its projected 2028 emissions on historical data, or ensured that any significant deviations from that historical data were made enforceable. Because, as is discussed in various places in this report, NC DEQ’s 2028 projected emissions have allowed facilities to avoid a four-factor analysis, this must be corrected.

For instance, in Table 7-41, NC DEQ indicates that it revised its 2028 projected SO₂ emissions for Cliffside from 1,082 to 161 tons. In Table 7-42, NC DEQ indicates that it revised its 2028 projected NO_x emissions from 1,948 to 327 tons. Below are Cliffside’s recent SO₂ and NO_x annual emissions:

Table 1. Cliffside Recent SO₂ Annual Emissions

Unit	2018 SO ₂ (tons)	2019 SO ₂ (tons)	2020 SO ₂ (tons)
5	441	628	320
6	908	754	499
Totals	1,349	1,383	819

Table 2. Cliffside Recent NO_x Annual Emissions

Unit	2018 NO _x (tons)	2019 NO _x (tons)	2020 NO _x (tons)
5	875	1,283	962
6	1,075	1,203	1,110
Totals	1,950	2,486	2,072

As can be seen from the above tables, NC DEQ’s revised SO₂ and NO_x 2028 emissions are multiples below what the facility emitted in 2020. The facility’s Title V permit (04044T45, effective March 18, 2021) indicates that the two active EGUs, Units 5 and 6, are permitted to burn coal, natural gas, or fuel oil in any percentage. Duke’s Consent Decree also does not appear to place any restrictions on these units as to operations or fuel.¹⁰ Thus, there does not appear to be any enforceable mechanism that would limit the facility’s future SO₂ emissions to the level projected by NC DEQ. The only potential insight to NC DEQ’s extreme underestimate of Cliffside’s 2028 emissions may be on page 276, where NC DEQ indicates that under Duke’s 2020 Integrated Resource Plan (IRP) Projections, Unit 5 is projected to be retired in 2026. The Regional Haze Guidance indicates, in order to implement this under Section 51.308(f)(2)(iv)(C) of the Regional Haze Rule, Source retirement and replacement schedules, North Carolina must include an enforceable commitment in its SIP.¹¹ That aside, even just Unit 6’s 2020 emissions alone are greater than NC DEQ’s 2028 facility-wide projections, making clear that the unit has

¹⁰ https://www.epa.gov/sites/default/files/2015-09/documents/duke-energy-consent-decree-civil-action-1cv1262_0.pdf.

¹¹ See Regional Haze Guidance, page 22.

the potential to emit significant SO₂ and should undergo a four-factor analysis to assess cost-effective, enforceable emission reductions.

A number of other examples of NC DEQ basing its source selection modeling on 2028 emissions that are significantly below recent emissions, without any apparent enforceable mechanism, are cited within this report. NC DEQ should reassess all of its projected 2028 point source emissions and only base deviations from recent historical emission data on enforceable commitments. After having done so, NC DEQ should then reassess whether additional sources should have been selected for four-factor analyses.

2.3 NC DEQ's PSAT Source Selection Methodology is Flawed

NC DEQ PSAT tagged facilities to determine their contribution to North Carolina Class I Areas if the AoI contribution was $\geq 3\%$ sulfate + nitrate. NC DEQ has not presented any real explanation to justify this threshold, other than stating on page 231 that this was the same threshold used by Tennessee. As noted by NC DEQ, "For the facilities selected for PSAT analysis by other VISTAS states, 8 facilities had an AoI contribution of $\geq 3\%$ and an additional 11 facilities had an AoI contribution of $\geq 1\%$ and $\leq 3\%$ for one or more Class I areas in the Southeast or neighboring regions (emphasis added). Thus, some states did indeed select a lower threshold for identifying sources for PSAT tagging, and it appears that NC DEQ's 3% threshold is a significant but arbitrary determinant in its SIP. The result of NC DEQ's 3% threshold is that only five facilities in North Carolina were PSAT tagged. Had NC DEQ selected a 1% threshold, then according to Tables 7-20 through 7-24, 13 sources would have been selected for PSAT tagging. NC DEQ further notes the following:

In addition, the NCDAQ also considered the fact that emissions are continuing to decline early in the second planning period and are expected to maintain a rate that is parallel with the URP for each of North Carolina's Class I areas based on the federal and state control programs and actions discuss in Section 7.2 of this SIP. Given these considerations, and the fact that the regional haze planning is an iterative process that requires the state to evaluate and adjust the LTS as needed during future planning periods, the NCDAQ believes that the facilities selected by North Carolina and other VISTAS states for PSAT modeling is a reasonable number of facilities for which to evaluate further for reasonable progress analyses.

This position is further reiterated in NC DEQ's reply to FLM comments on page 347 criticizing its source selection strategy that, "it is reasonable for a state to select more sources for four-factor analysis if the Class I area is just below or at the URP, and to select fewer sources if the Class I area is well below the URP."

As the above information indicates, NC DEQ acknowledges it could have selected a lower AoI threshold for PSAT tagging, but uses the progress its Class I Areas have made as a safe harbor against further reductions. As the Regional Haze Rule indicates, this is specifically prohibited:¹²

Treating the URP as a safe harbor would be inconsistent with the statutory requirement that states assess the potential to make further reasonable progress towards natural visibility goal in every implementation period. Even if a state is currently on or below the URP, there may be sources contributing to visibility impairment for which it would be reasonable to apply additional control measures in light of the four factors. Although it may conversely be the case that no such sources or control measures exist in a particular state with respect to a particular Class I area and implementation period, this should be determined based on a four-factor analysis for a reasonable set of in-state sources that are contributing the most to the visibility impairment that is still occurring at the Class I area. It would bypass the four statutory factors and undermine the fundamental structure and purpose of the reasonable progress analysis to treat the URP as a safe harbor, or as a rigid requirement.

Thus, the Regional Haze Rule makes it clear that states should not eliminate sources that could have cost-effective controls from consideration because a reasonable progress goal is below the URP. EPA's recent Clarification Memo reinforces this point.¹³

The 2017 RHR preamble and the August 2019 Guidance clearly state that it is not appropriate to use the URP in this way, i.e., as a "safe harbor." The URP is a planning metric used to gauge the amount of progress made thus far and the amount left to make. It is not based on consideration of the four statutory factors and, therefore, cannot answer the question of whether the amount of progress made in any particular implementation period is "reasonable progress." This concept was explained in the RHR preamble. Therefore, states must select a reasonable number [of] sources and evaluate and determine emission reduction measures that are necessary to make reasonable progress by considering the four statutory factors.

It is quite possible that had NC DEQ selected an AoI threshold lower than 3% sulfate + nitrate, additional sources would have had PSAT contributions greater than 1.00% for sulfate or nitrate, and would therefore have been selected for a four-factor analysis. NC DEQ's source selection strategy may therefore be predetermining the four-factor analysis methodology and therefore must be revised.¹⁴ As indicated elsewhere in this report, there are in fact a number of sources that likely do have cost-effective controls available.

¹² 82 FR 3099 (January 10, 2017).

¹³ Clarification Memo, page 15.

¹⁴ Note that as discussed in a subsequent comment, NC DEQ's PSAT-AoI correlation that it apparently uses to discount an AOI-only source selection criteria is flawed.

2.4 NC DEQ's Reply to FLMs Criticism of its Source Selection Strategy is not Adequate

As indicated above, the FLMs criticized NC DEQ's source selection strategy. One key comment from the NPS is summarized by NC DEQ on page 344 and in more detail in Appendix H2:

Our source selection concern stems from the screening thresholds used that resulted in the selection of very few sources for analysis and offers less protection for the more-impacted Class I areas. We advised VISTAS states of this concern in April 2020. VISTAS states, including North Carolina, used a two-part screening process. Both steps used an individual-facility-percent-of-total-impact screening metric. This type of metric biases the results against the more-visually impacted Class I areas. In fact, source impacts would have to be 80 times larger to identify a source for analysis in the most-visually-impaired VISTAS Class I area compared to the least-visually-impaired Class I area. The absolute value of the VISTAS thresholds to identify a source affecting Great Smoky Mountains NP is 19 times higher than was needed to identify a source affecting Everglades NP in Florida (the least-visually-impaired VISTAS Class I area).

In other words, use of a blanket percentage contribution threshold over many states with many Class I Areas is not appropriate. This is because source contributions at the most impaired Class I Areas would have to be much greater than at the least impacted Class I Areas in order to reach the percentage contribution threshold and be selected for a four-factor analysis. The FLM's concern is an eminently valid observation. NC DEQ does not dispute this point and instead simply offers up the invalid safe harbor response noted above.

2.5 NC DEQ's PSAT Threshold is not Supported

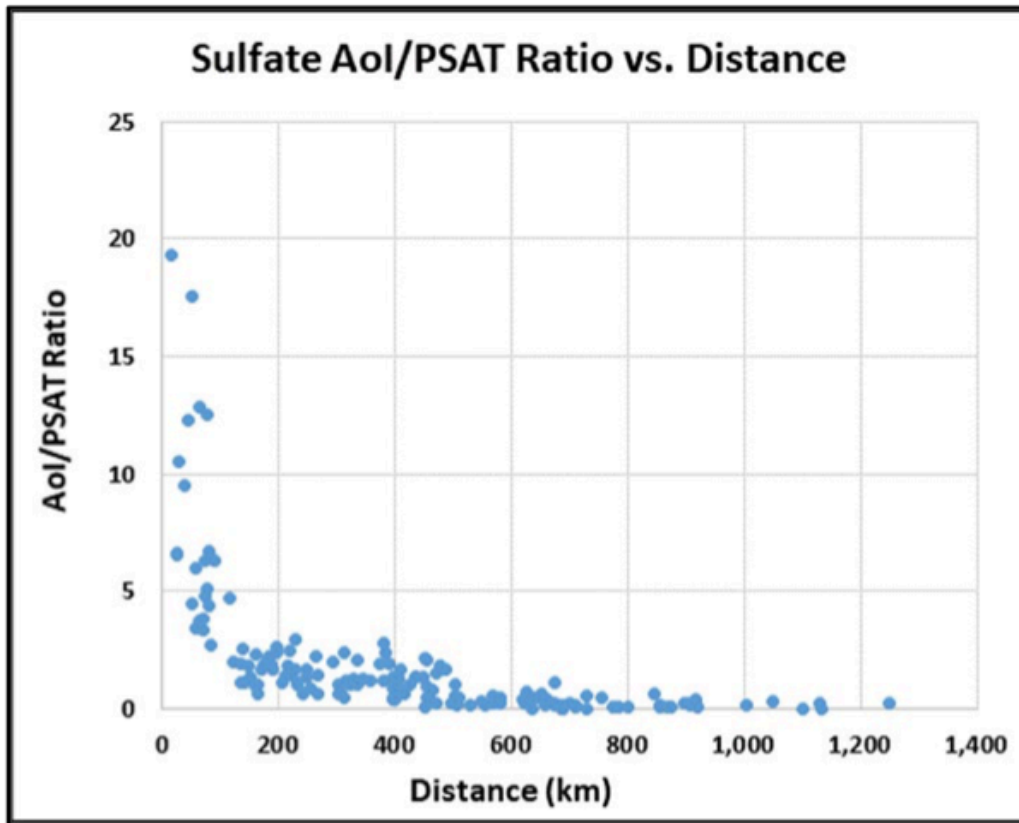
On page 266, NC DEQ states that it selected facilities to analyze for reasonable progress with at least a 1.00% PSAT threshold for sulfate or nitrate. NC DEQ doesn't explain this selection other than asserting that other VISTAS states used that threshold as well. NC DEQ should explain (1) why it selected this threshold, and (2) justify this threshold in light of the threshold EPA used to determine which Texas sources should receive a four-factor analysis in the Texas FIP.¹⁵ Here EPA determined it was reasonable in dirty background modeling (which is what VISTAS employed) to require any individual unit with at least a 0.3% extinction contribution at any Class I Area to undergo a four-factor analysis. As is demonstrated in detail in other comments, had NC DEQ selected just a slightly lower threshold, it would have conducted four-factor analyses on a number of sources with proven available and likely very cost-effective controls.

¹⁵ Technical Support Document for the Oklahoma and Texas Regional Haze Federal Implementation Plans, (FIP TSD), November 2014. See the discussion beginning on page A-49. Available here: <https://www.regulations.gov/document/EPA-R06-OAR-2016-0611-0052>.

2.6 NC DEQ's PSAT - AoI Correlation is a Misinterpretation of the Data

On page 262, NC DEQ compares its PSAT source selection results to the sources it would have selected had it stopped at AoI source selection. NC DEQ presents Figure 7-77, which consists of three graphs that indicate the ratios of AoI/PSAT contributions for sulfate, nitrate, and sulfate + nitrate as a function of distance from the facility to the Class I area. Below is the figure relating to sulfate:

Figure 1. NC DEQ's Figure 7-77: Ratio of AoI/PSAT % Contributions for Sulfate as a Function of Distance from the Facility to the Class I Area



In the above figure, each point represents one facility's ratio of its AoI to PSAT sulfate contribution at a Class I Area versus its distance to that Class I Area. At first glance, it appears to resemble an exponential decline function. However, inspection of the points closest to zero indicates that the scatter in the data greatly increases. For example, the point with the smallest distance has a value of about 19, whereas the next two closest points, that are only slightly farther away, have values of about 11 and 7. Moving only slightly farther away results in values that range from about 3 to 13. The amount of scatter in the data decreases with distance, but is still significant out to at least 400 km. This indicates that the correlation is likely invalid at distances of perhaps 100 km or less.

Following this NC DEQ makes a fractional bias calculation. This is a common technique that has long been used to compare a model's output to observed values. The equation is as follows:¹⁶

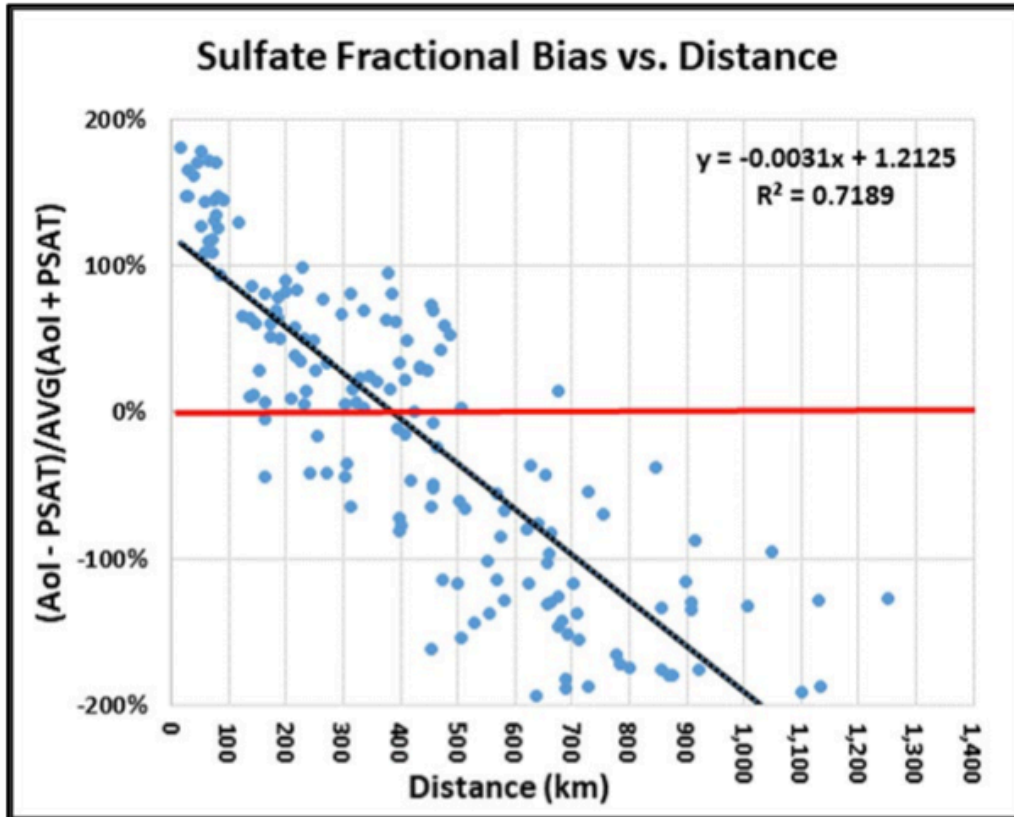
$$FB = 2 \times \left(\frac{OB - PR}{OB + PR} \right)$$

where OB = observed values, and PR = predicted (modeled) values.

Typically, the observed values are monitored or measured values that can be viewed as known values, against which the predicted (modeled) values are compared. In this case, NC DEQ uses the AoI values as the observed values and the PSAT values as the predicted values. However, the AoI values are not known values and are simply other predicted values; albeit predicted differently than the PSAT values. Therefore, NC DEQ's use of the fractional bias calculation in this instance is suspect. That aside, NC DEQ presents graphs of its fractional bias calculations. Below is the figure relating to sulfate:

Figure 2. NC DEQ's Figure 7-78: Fractional Bias for Sulfate as a Function of Distance from the Facility to the Class I Area

¹⁶ See for instance: https://www.epa.gov/sites/production/files/2020-10/documents/model_eval_protocol.pdf.



As can be seen from the above figure, there is again a great deal of scatter in the data. Calculated fractional bias values range from zero to 100% or greater for points that are essentially the same distance from the Class I Area. This means that at any given distance there is a wide range in the difference in correlation between the AoI and PSAT values. This is evident from an examination of the AoI and PSAT results in Tables 7-29 and 7-30. As a consequence, NC DEQ's conclusion on page 262 that "if the facility is <100 Km from the Class I area, the AoI results are generally (with a few exceptions for nitrates) three times or more higher than the PSAT results," is unfounded. NC DEQ also states, "Therefore, AoI impacts for nearby sources can be adjusted downward to remove the systematic bias in the contributions." As demonstrated, however, NC DEQ's correlation is invalid and the sources that NC DEQ eliminated from consideration based on that conclusion should be re-examined.

Furthermore, as Tables 7-29 and 7-30 indicate, there are very large differences in the AoI versus PSAT calculated percent contributions of key sources on North Carolina's Class I Areas. The above discussion does not adequately explain these differences. Such large differences cast doubt on the validity of NC DEQ's decision to only tag sources for PSAT if the AoI contribution was $\geq 3\%$ sulfate + nitrate.

In addition to the flaws identified above in NC DEQ's fractional bias calculation, there are also significant technical issues concerning whether PSAT modeling accurately represents visibility impacts from emission sources in close proximity to Class I areas.¹⁷ Thus, NC DEQ should revisit this issue.

2.7 NC DEQ's PSAT Documentation Should be Updated

On page 232 of its SIP, NC DEQ states:

The original PSAT results were based on the initial 2028 SO₂ and NO_x point source emissions, which may be found in Appendix B-1 (Task 2A and Task 3A reports). As previously discussed, the 2028 EGU and non-EGU point emissions were updated for a new 2028 model run, but PSAT modeling was not redone with the revised emissions because of time and resource constraints. Details of the updated emissions may be found in Appendix B-2 (Task 2B and Task 3B reports). Instead, the original PSAT results were linearly scaled to reflect the updated 2028 emissions. The details of the PSAT adjustments can be found in Appendix E-7b (Roadmap).

In its letters to sources informing them they must perform four-factor analyses, NC DEQ notes that it has in fact adjusted the PSAT modeling, presumably using the linear scaling described above. For example, in its letter to Blue Ridge Paper, NC DEQ states:

The DAQ used the revised 2028 SO₂ emissions you provided and recalculated BRPP's [Blue Ridge Paper Products] contribution to visibility impairment for the 20% most impaired days at Shining Rock Wilderness Area using the Particulate Matter Source Apportionment Technology (PSAT) modeling approach referenced in my June 18, 2020 letter. The revised PSAT results indicate that BRPP's contribution of SO₂ emissions to visibility impairment would increase from 1.08% to 1.30% in 2028.

On page 285, NC DEQ indicates that these revised PSAT results were revised again, "to account for issues imbedded in the modeled emissions for elv3 (see Appendix B of this SIP)." In BRPP's case, the 1.30% impact at Shining Rock Wilderness Area (SHRO) increased to 1.36%. NC DEQ provides the twice revised PSAT impacts only for BRPP, Domtar, and PCS Phosphate in Table 7-47. In Domtar's case, the impacts also increased but in PCS Phosphate's case, the impacts decreased. NC DEQ states these revisions did not change the selection of facilities for a reasonable progress assessment, and references Appendix B (Task 6 – Benchmark Run #7 Report Review and 2028 elv3 Reassessment) of the Task 3A report. However, a review of that material seemed to contain emission inventory revisions and does not appear to indicate how NC

¹⁷ See the accompanying report "Technical Review of North Carolina Regional Haze State Implementation Plan, Second Round of Regional Haze State Implementation Plans, Supplemental Report, by D. Howard Gebhart, October 2021."

DEQ actually revised its PSAT results. Further confusing this issue, Table 7-30 indicates that BRPP's sulfate + nitrate contribution to SHRO is 1.234, which does not seem to align with either of the above discussed revisions (similar apparent discrepancies occur in comparing the figures in cited in letters sent to the other two facilities). NC DEQ should explain these further apparent discrepancies.

Regarding all of this, NC DEQ should do the following:

- Make it absolutely clear in the body of its SIP, why it twice revised its PSAT results.
- Indicate how it made those revisions, including repeatable calculations.
- Revise the PSAT information in Tables 7-30 through 7-35 and any other references to PSAT results in the SIP.
- Revise the SIP narrative in section 7 to include this revised information.
- Discuss on a case-by-case basis (this report's objection to NC DEQ's 1% PSAT threshold aside) why it did or did not select facilities for a four-factor analysis.

2.8 NC DEQ's Reasoning for not Selecting Duke Energy Sources is Flawed

On page 270, NC DEQ discusses why it did not select any Duke Energy power plants to undergo four-factor analyses. Part of its reasoning is wrapped up in its conclusion that AoI results for sulfates are at least three times higher than the PSAT results for facilities that are <100 Km from a given Class I area. As discussed above, this blanket pronouncement is based on faulty analysis and thus cannot be used to exempt the Duke Energy sources from four-factor analyses. NC DEQ also reasons that it is likely that North Carolina's EGU fleet will undergo changes to mitigate carbon dioxide emissions that will require moving away from coal to less carbon intensive fuels, which has not been accounted for in the EGU projections supporting the AoI and PSAT analyses. Part of NC DEQ's reluctance to review Duke Energy sources also seems to be contained in its 2028 emission projections. NC DEQ presents Tables 7-41 and 7-42, which contrast Duke Energy power plant historical emissions with initial 2028 projections and revised projections. In many cases, NC DEQ's revised 2028 projections are greatly reduced from its original 2028 projections and in fact recent historical emissions. Again, as discussed above in other comments and reflected in regulations and guidance, absent an enforceable commitment memorialized in the SIP, NC DEQ cannot assume that any source's emissions will drop. NC DEQ should re-evaluate its 2028 emissions projections, and re-evaluate Duke Energy sources for four-factor analyses.

3 NC DEQ Wrongly Ignored Likely Cost-Effective Controls

On page 266 NC DEQ explains that all VISTAS states used a 1.00% PSAT threshold by facility for screening sources for reasonable progress. On page 267, NC DEQ states that 19 facilities exceeded the 1.00% PSAT threshold for sulfate but that it reviewed facilities with <1% sulfate or <1% nitrate contribution to one or more of the Class I areas in North Carolina. NC DEQ concluded that, "[b]ased on this review, the NCDAQ did not identify any uncontrolled or lightly controlled facilities that were large contributors to anthropogenic light extinction at any of North Carolina's Class I areas." NC DEQ does not present this analysis.

As a first order concern, it is unclear what NC DEQ means by “lightly controlled.” From a Regional Haze regulatory standpoint, such a term has no meaning. In fact, as this report indicates, easily performed preliminary analyses would have revealed that many of these sources have proven controls available that are likely very cost-effective. However, the Regional Haze Rule has long recognized that upgrades to scrubbers are also generally cost-effective and should be examined by states to ensure reasonable progress.¹⁸ More recently, the Clarification Memo reaffirmed that guidance when it stated:¹⁹

Considering efficiency improvements for an existing control (e.g., using additional reagent to increase the efficiency of an existing scrubber) as a potential measure is generally reasonable since in many cases such improvements may only involve additional operation and maintenance costs. States should generally include efficiency improvements for sources’ existing measures as control options in their four-factor analyses in addition to other types of emission reduction measures.

Given EPA’s previous findings that scrubber upgrades can achieve 98% control for Wet Flue Gas Desulfurization (WFGD, or “wet scrubber”) and 95% for Spray Dryer Absorber (SDA, or “dry scrubber”), NC DEQ must evaluate the cost-effectiveness of those emission limits under the four statutory factors. Many significant wet scrubber upgrades involve relatively low capital expenditures (e.g., liquid to gas improvements such as rings or trays, new spray headers/nozzles, etc.) and often consist of simply running all available absorbers and pumps and utilizing better reagent management or simply using more reagent and/or organic acid additives such as Dibasic Acid (DBA).

Similarly, as discussed above, many EGUs have demonstrated the ability of their SCR systems to consistently achieve much lower NO_x levels than they are currently emitting. In these cases, the only costs would be associated with additional reagent and/or better catalyst management practices. In almost all cases, as documented in the comments reviewing the Cardinal facility below, modern SCR systems should be capable of achieving NO_x levels of 0.05 lbs/MMBtu or lower, based on a 30 boiler operating day average.

It is acknowledged that, depending on the configuration, the reduced load that some of these EGUs have experienced introduces additional complications such as less than optimum exhaust gas temperature at the catalyst, and ammonium bisulfate deposition. In such instances, additional maintenance costs and possibly reheater or lower temperature catalyst capital costs may be justified. However, these costs do not relate to infeasibility. Rather, they are all

¹⁸ For instance, see the Final Regional Haze Rule update, 82 Fed. Reg. 3088 (January 10, 2017): Here, EPA explains that Texas’ analysis was in part rejected because it did not properly consider EGU scrubber upgrades. Also see the BART Final Rule, 70 Fed. Red. 39171 (July 6, 2005): “For those BART-eligible EGUs with preexisting post-combustion SO₂ controls achieving removal efficiencies of at least 50 percent, your BART determination should consider cost effective scrubber upgrades designed to improve the system’s overall SO₂ removal efficiency.”

¹⁹ Clarification Memo. See page 7.

identifiable, solvable, and ultimately can be included in the cost analysis. Duke Energy is highly experienced in this area, as evidenced by its work at the Gibson Station.²⁰

NC DEQ should therefore reassess its source selection process and look for opportunities, many of which are discussed within this report, to upgrade existing scrubber and SCR systems. It is very likely NC DEQ will find that these controls will in most cases be very cost-effective.

Below is a review of a number of these sources that demonstrates opportunities for scrubber and SCR system upgrades. This is not a comprehensive review and other examples may exist. Some of these sources are located in North Carolina and are therefore under NC DEQ's direct authority for review. Other sources are located in other states, but significantly impact the visibility at North Carolina Class I Areas. For these external sources, NC DEQ should have formally requested reductions through the consultation process, instead of merely requesting that these sources be reviewed.

3.1 NC DEQ Should have Examined the Marshall Facility for Upgrades to NO_x and SO₂ Controls

The Marshall Power Plant in North Carolina is listed in Tables 7-31 to 7-35 as having multiple PSAT impacts at Great Smoky Mountains National Park (GRSM) of 0.32%, 0.35% at Joyce Kilmer-Slickrock Wilderness Area (JOYC), 0.87% at Linville Gorge Wilderness Area (LIGO), 0.73% at SHRO, and 0.62% at Swanquarter Wilderness Area (SWAN). It consists of four coal-fired units of 350 MW, 350 MW, 711 MW, and 711 MW. All are equipped with wet scrubbers. Units 1, 2 and 4 are equipped with SNCR systems and Unit 3 is equipped with a SCR system. However, as indicated below, these controls are underperforming. Below are 30 day monthly averages for the Marshall Units:²¹

²⁰ <https://www.power-eng.com/coal/boilers/scr-performance/>.

²¹ See the workbook, "NC EGU Emissions.xlsx."

Figure 3. Marshall Unit 1 Historical SO₂ and NO_x Monthly Emissions

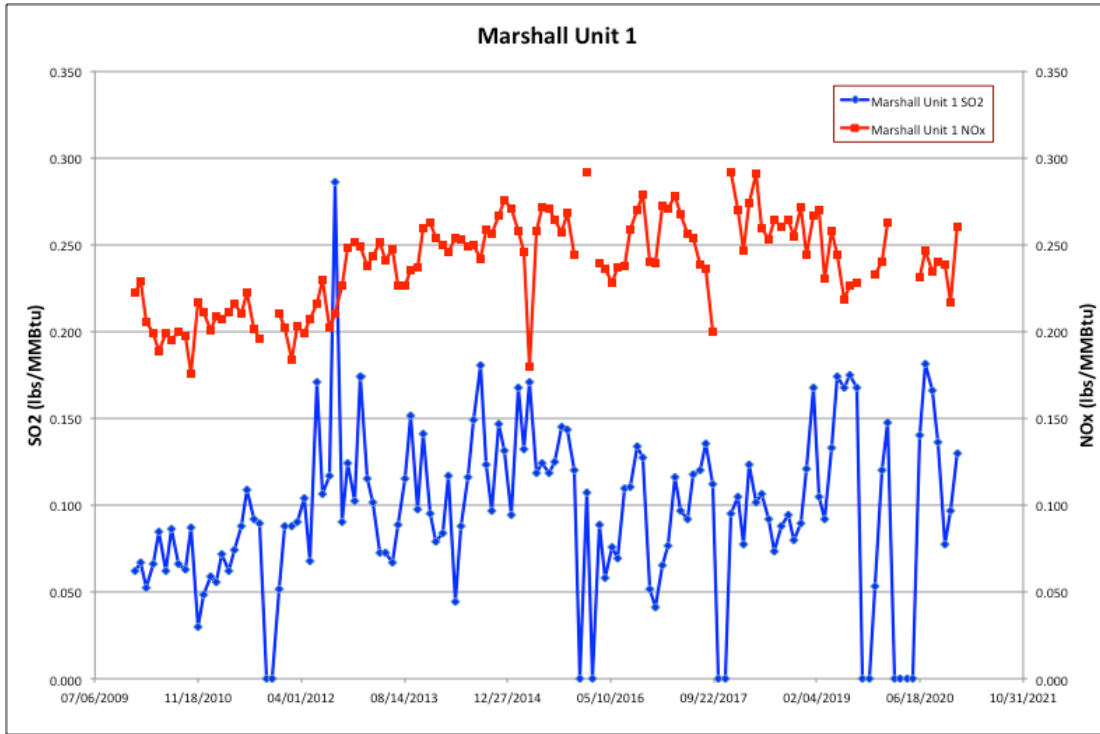


Figure 4. Marshall Unit 2 Historical SO₂ and NO_x Monthly Emissions

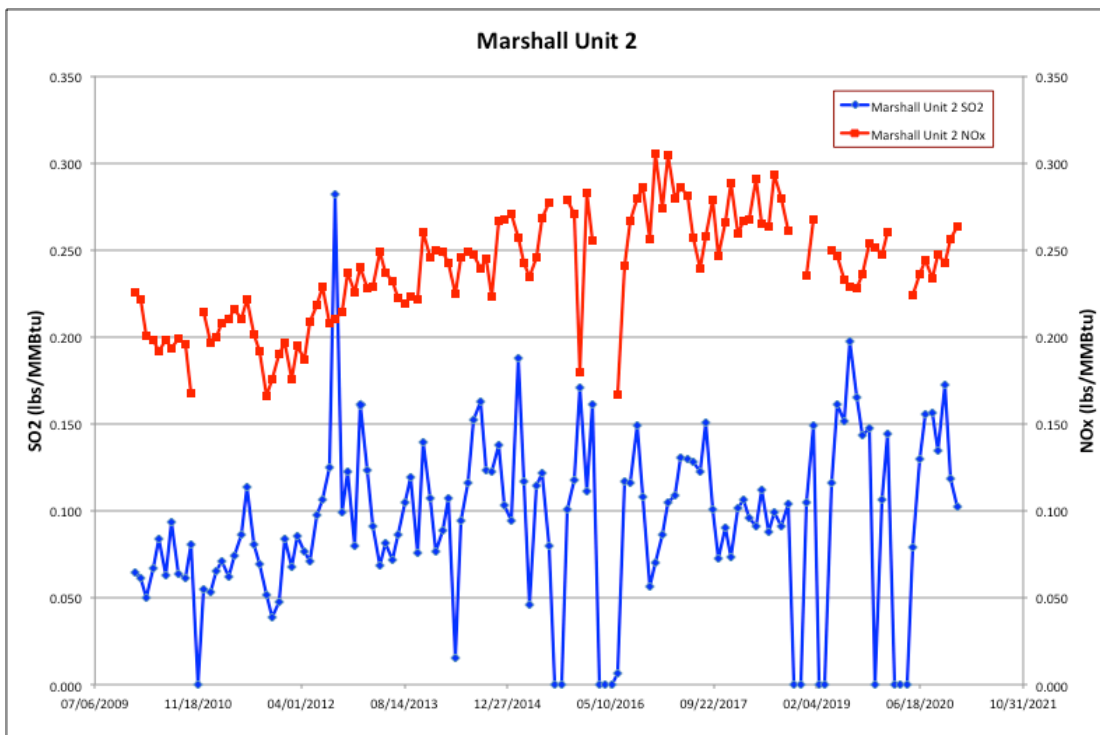


Figure 5. Marshall Unit 3 Historical SO₂ and NO_x Monthly Emissions

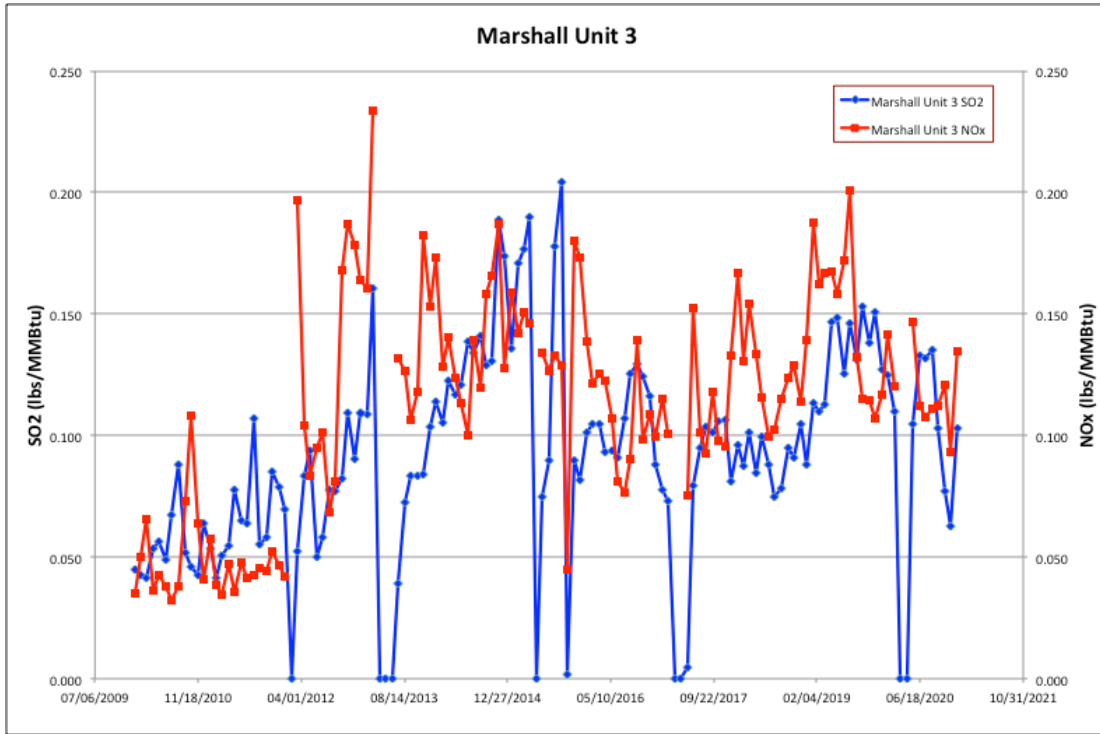
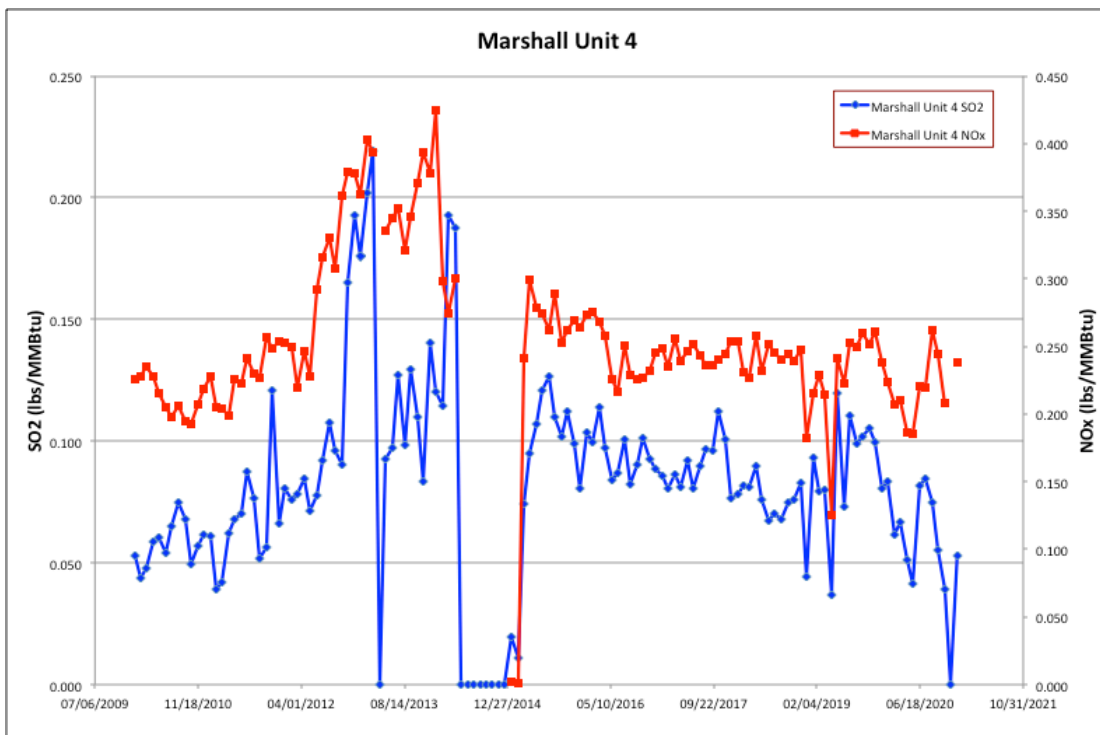


Figure 6. Marshall Unit 4 Historical SO₂ and NO_x Monthly Emissions



From the above graphs, it can be seen that the NO_x and SO₂ controls for all four units are not operated at a consistent level and are capable of better performance than recently exhibited.²² For instance, during 2010 – 2011, the SNCR systems for Units 1, 2, and 4 appear to have previously operated at a lower NO_x level of approximately 0.20 lbs/MMBtu, with some months significantly below that level. Also, the SCR system for Unit 3 is operated very erratically, but has demonstrated the ability from 2010 – 2011 to consistently operate below 0.05 lbs/MMBtu. This level of performance is in keeping with some of the best operated SCR systems in the U.S., as is discussed in the review of the Cardinal facility. Similarly, the wet scrubber systems on all four units are operated erratically, but during 2010 – 2011 have demonstrated the ability to continuously operate well below 0.10 lbs/MMBtu. Thus, without any capital upgrade cost (and likely minimal operating and maintenance costs), the Marshall units are quite capable of much better NO_x and SO₂ performance. It appears the only reason they do not is that they are not required by permit condition to do so. Additional reductions may also be possible with very moderate and likely cost-effective upgrades. NC DEQ should therefore have required—and should require—that the Marshall units undergo four-factor analyses.

On page 348, NC DEQ states “Coal units 3 and 4 currently have the capability to burn natural gas and coal units 1 and 2 are scheduled to be upgraded to burn natural gas in the fall of 2021.” Marshall’s Title V permit indicates that all four units are already permitted to burn natural gas without any apparent restriction. Therefore, NC DEQ should consider requiring provisions in the SIP for a complete switch to natural gas. Such a change would result in a SO₂ reduction of approximately 3,000 tpy, based on the facility’s 2020 SO₂ emissions.

3.2 NC DEQ Should have Examined the Belews Creek Facility for Upgrades to NO_x and SO₂ Controls

The Duke Energy Belews Creek Power Plant in NC was not selected for PSAT tagging. It consists of two nearly identical 1,120 MW units. Both are equipped with wet scrubbers and SCR systems. Both units are permitted to burn natural gas up to 50% of the boiler ratings. However, an examination of EIA-923 data indicates that Unit 2 has not reported burning any natural gas and Unit 1 has begun burning natural gas in 2020, with some, but inconsistent usage every month.

In Table 7-41, NC DEQ indicates that it revised its 2028 projected SO₂ emissions for Belews Creek from 4,946 to 1,385 tons. In Table 7-42, NC DEQ indicates that it revised its 2028 projected NO_x emissions from 5,264 to 1,867 tons. Below are Belews Creek’s recent SO₂ and NO_x annual emissions:

²² Note that because all units are permitted to also burn natural gas, EIA Form 923 (<https://www.eia.gov/electricity/data/eia923/>) was checked to determine which months indicated any unit did so from 2017 through 2020. This analysis indicated that only Unit 3 burned natural gas during 11/2020 – 12/2020. Thus, the analysis described herein is not impacted from burning natural gas.

Table 3. Belews Creek Recent SO₂ Annual Emissions

Unit	2018 SO ₂ (tons)	2019 SO ₂ (tons)	2020 SO ₂ (tons)
1	2,460	1,570	719
2	1,659	1,801	1,154
Totals	4,119	3,371	1,873

Table 4. Belews Creek Recent NO_x Annual Emissions

Unit	2018 NO _x (tons)	2019 NO _x (tons)	2020 NO _x (tons)
1	4,731	2,822	2,675
2	2,540	2,847	1,792
Totals	7,272	5,668	4,467

As can be seen from the above tables, NC DEQ’s revised SO₂ 2028 emissions are significantly less than the facility emitted in 2020. Presumably the SO₂ revision is connected to statements made by Duke Energy that recent infrastructure changes will “allow 40% natural gas co-firing on both units.”²³ However, there does not appear to be any permit or other enforceable requirement that Belews Creek fire any natural gas, except during startup. There does not appear to be any plausible explanation for NC DEQ’s very significant decrease in 2028 NO_x emissions. Current facility NO_x emissions are more than double NC DEQ’s revised 2028 emissions. Again, as has been discussed above, NC DEQ should either base its projected 2028 emissions on historical data, or ensure that any significant deviations from historical data are made enforceable in the SIP.

As indicated below, both the wet scrubber and SCR systems are underperforming. Below are 30-day monthly averages for the Belews Creek Units:²⁴

²³ See: <https://www.duke-energy.com/our-company/about-us/power-plants/belews-creek-steam-station>.

²⁴ See the workbook, “NC EGU Emissions.xlsx.”

Figure 7. Belevs Creek Unit 1 Historical SO₂ and NO_x Monthly Emissions

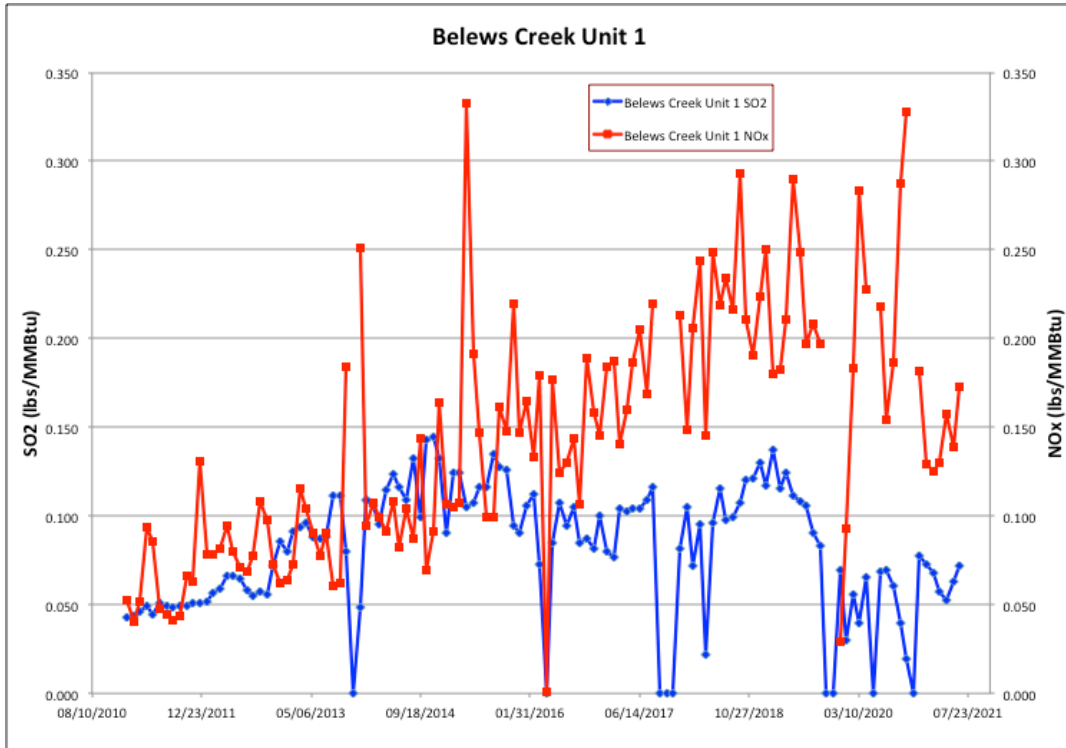
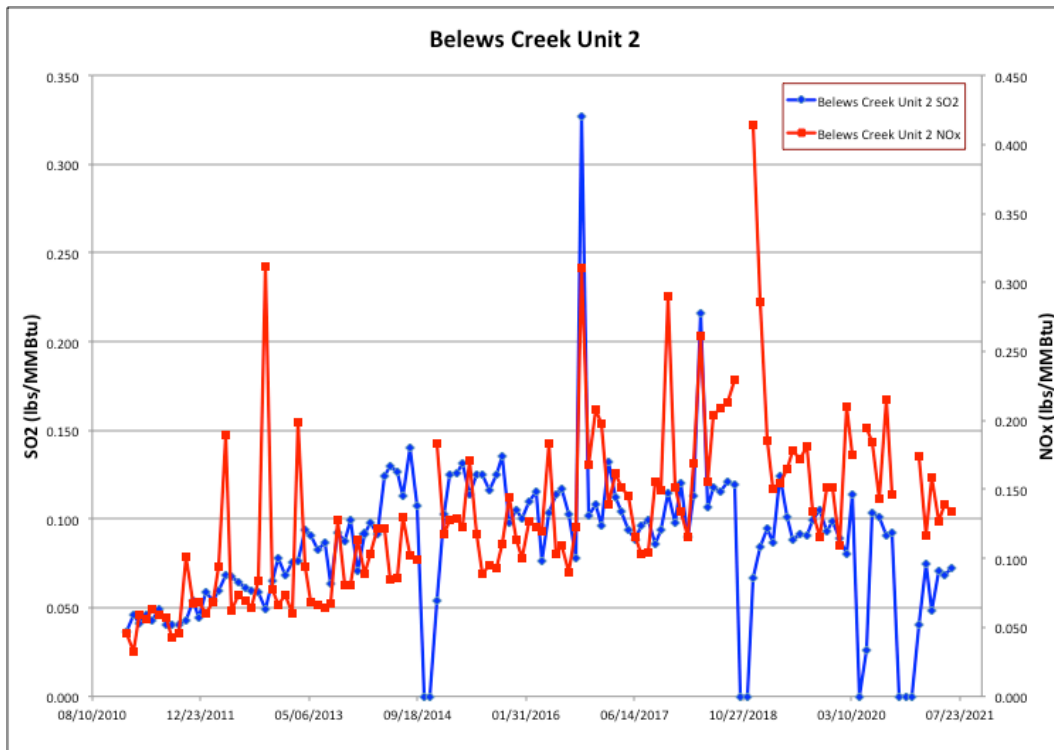


Figure 8. Belevs Creek Unit 2 Historical SO₂ and NO_x Monthly Emissions



As can be seen from the above graphs, both the SCR and scrubber systems have demonstrated the capability to consistently control SO₂ and NO_x to 0.05 lbs/MMBtu or better on a monthly average basis for both units (which are nearly identical and have identical controls). However, the performance of these systems has steadily degraded over time. In addition, NO_x control is especially erratic. Unit 1's SO₂ dip in 2020 is likely due to the start of its usage of natural gas. However, even with that, the SO₂ rate is still much higher than 0.05 lbs/MMBtu. Likely, the reason for the lax performance of these control systems is that Belews Creek's permit doesn't require better performance. Thus, very cost-effective controls are available for both units for likely just the increase in reagent, potentially better catalyst management and additional electricity for running all absorber pumps. NC DEQ should have required a four-factor analysis for this facility and investigated this issue.

3.3 NC DEQ Should have Examined the Roxboro Facility for Upgrades to NO_x and SO₂ Controls

The Duke Energy Roxboro Power Plant in North Carolina was not selected for PSAT tagging. It is commonly represented as consisting of four units: 411 MW, 657 MW, 745 MW, and 745 MW. However, it appears from an examination of aerial photography that Units 3 and 4 are each composed of dual boilers, each with separate Electrostatic Precipitators (ESPs) and SCR systems, but sharing a wet scrubber and a stack. Because emissions data are split into Units 1, 2, 3A, 3B, 4A, and 4B, it is assumed that each pair of twin units share a monitor with emissions data being apportioned, and this appears to be born out by the emissions data.

In Table 7-41, NC DEQ indicates that it revised its 2028 projected SO₂ emissions for Roxboro from 6,665 to 2,258 tons. In Table 7-42, NC DEQ indicates that it revised its 2028 projected NO_x emissions from 4,528 to 1,532 tons, but that does not appear to be an enforceable limitation. Below are Roxboro's recent SO₂ and NO_x annual emissions:

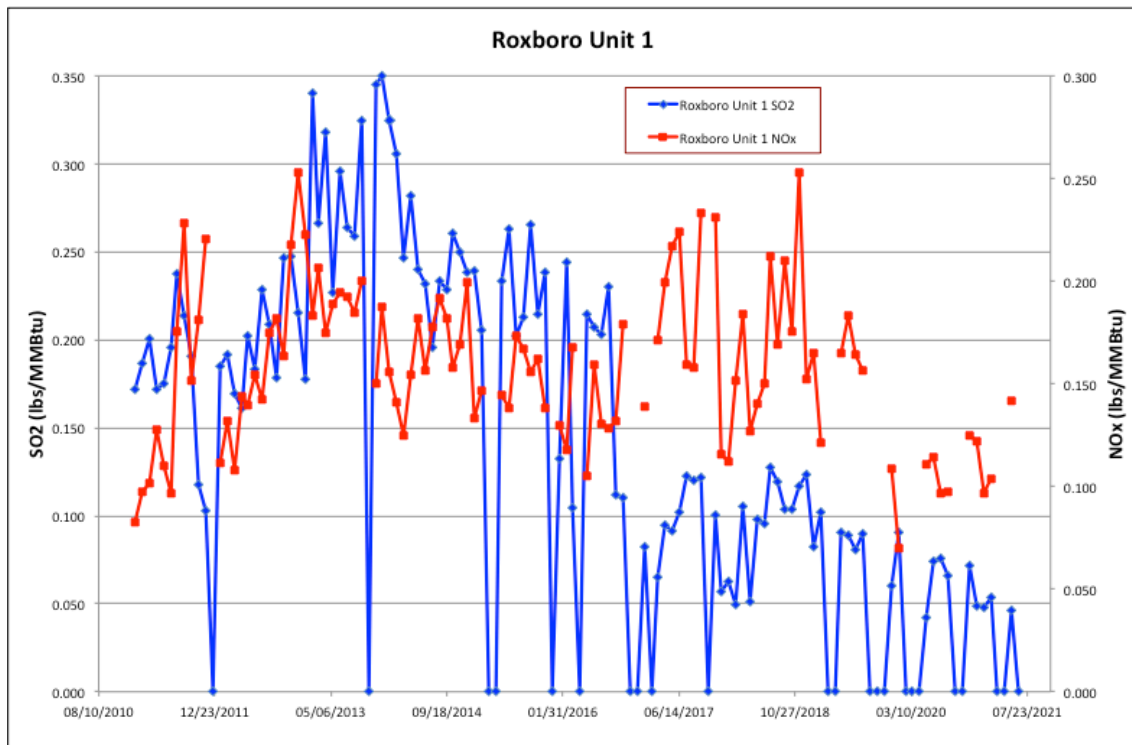
Table 5. Roxboro Recent SO₂ and NO_x Annual Emissions

Unit	2018 SO ₂ (tons)	2019 SO ₂ (tons)	2020 SO ₂ (tons)	2018 NO _x (tons)	2019 NO _x (tons)	2020 NO _x (tons)
1	444	278	203	709	452	317
2	1,207	615	740	1,762	827	998
3A	442	666	503	768	882	699
3B	471	656	508	878	694	768
4A	571	988	376	835	948	499
4B	470	940	307	689	898	395
Totals	3,605	4,143	2,637	5,641	4,701	3,676

As can be seen from the above tables, NC DEQ’s revised SO₂ 2028 emissions are slightly less than the facility emitted in 2020 and its revised NO_x 2028 emissions are much less. Current facility NO_x emissions are more than double NC DEQ’s revised 2028 emissions. Again, as has been discussed above, NC DEQ should either base its projected 2028 emissions on historical data, or ensure that any significant deviations from that historical data are made enforceable in the SIP.

As indicated below, both the wet scrubber and SCR systems are underperforming. Below are 30-day monthly averages for the Roxboro Units:²⁵

Figure 9. Roxboro Unit 1 Historical SO₂ and NO_x Monthly Emissions



²⁵ See the workbook, “NC EGU Emissions.xlsx.”

Figure 10. Roxboro Unit 2 Historical SO₂ and NO_x Monthly Emissions

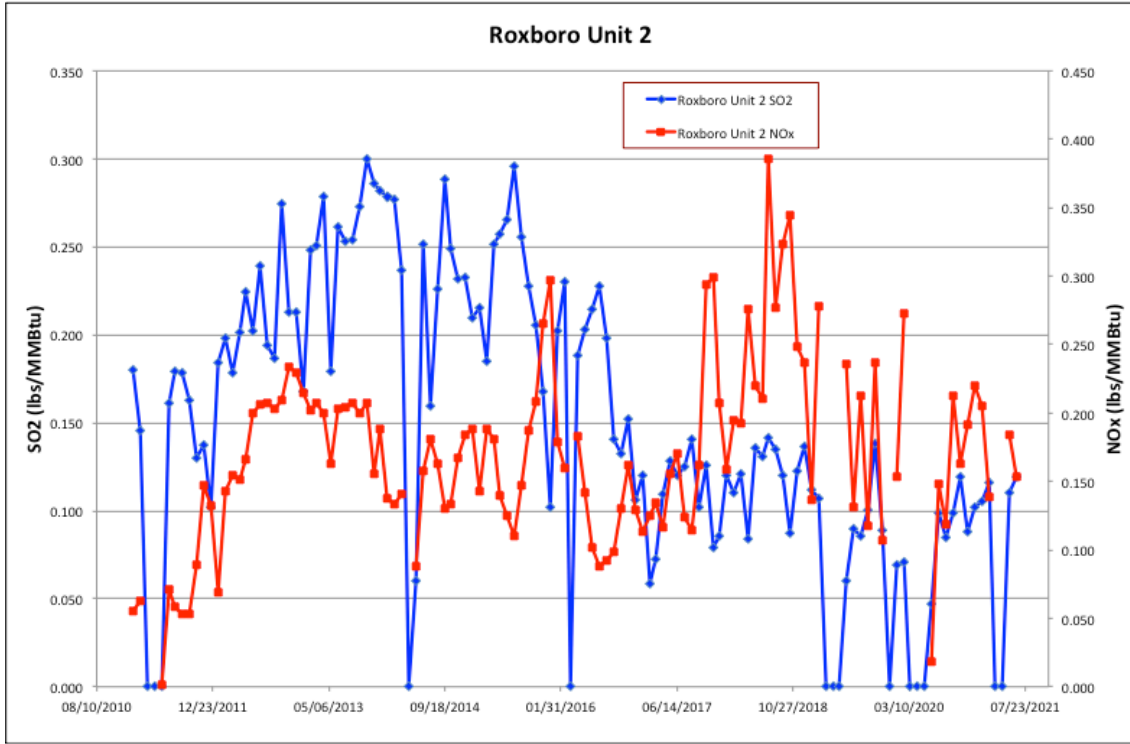


Figure 11. Roxboro Unit 3B Historical SO₂ and NO_x Monthly Emissions

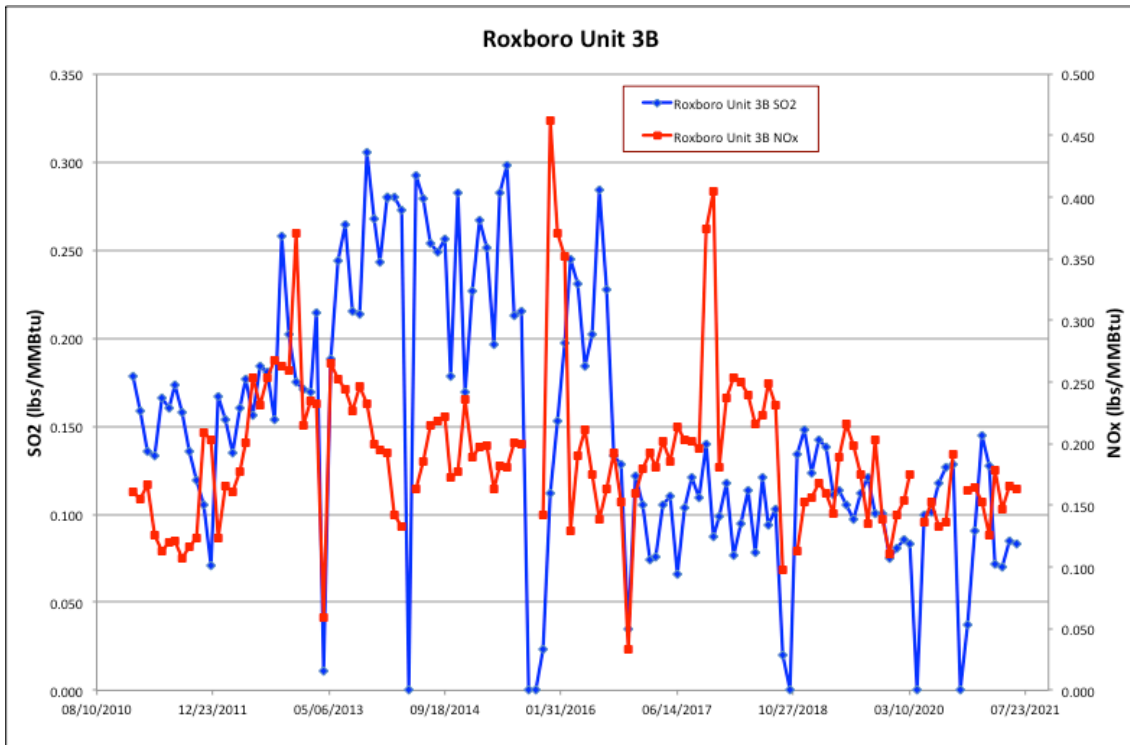
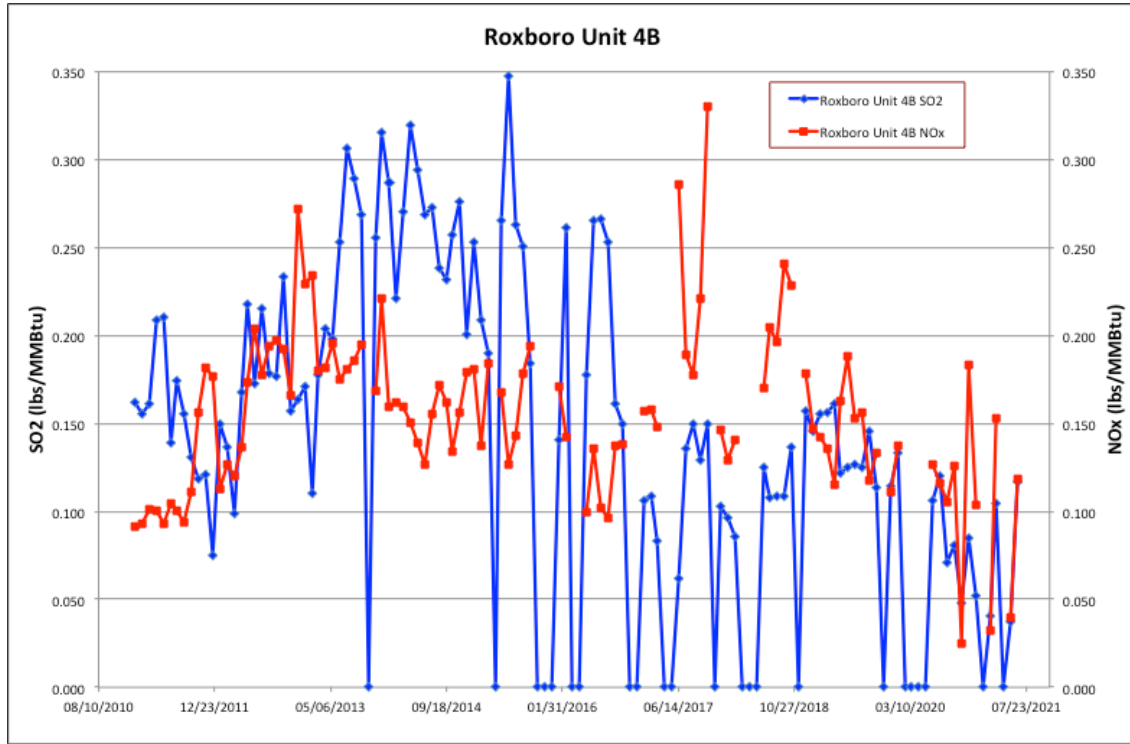


Figure 12. Roxboro Unit 4B Historical SO₂ and NO_x Monthly Emissions



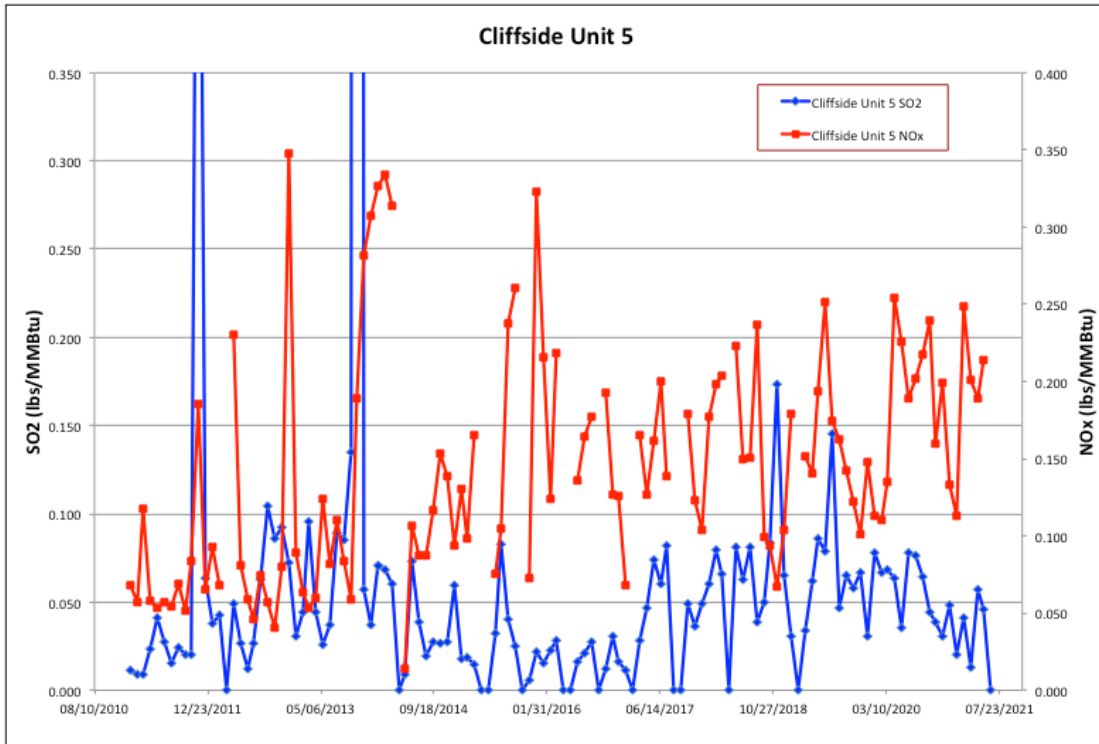
As can be seen from the above graphs, the scrubber systems have demonstrated the capability to consistently control SO₂ to approximately 0.075 lbs/MMBtu or better on a monthly average basis. Although the units have all decreased their SO₂ emissions beginning approximately in September 2016, the wet scrubber systems are still significantly underperforming. The SCR systems have been operated very erratically, although all have demonstrated the ability to continuously operate at approximately 0.10 lbs/MMBtu. It is likely all the SCR systems could operate at 0.05 lbs/MMBtu on a monthly average basis, as discussed in the review of the Cardinal facility. Thus, very cost-effective controls are available for all the scrubber and SCR systems for just the increase in reagent, potentially better catalyst management and additional electricity for running all absorber pumps. NC DEQ should have required a four-factor analysis for this facility and investigated this issue.

3.4 NC DEQ Should have Examined the Cliffside Facility for Upgrades to NO_x and SO₂ Controls

The Duke Energy Cliffside Power Plant in North Carolina was not selected for PSAT tagging. It consists of two remaining units: 621 MW and 910 MW. Both units are fitted with wet scrubber and SCR systems. As has been discussed above in another comment, there is a large difference between Cliffside's actual emissions and NC DEQ's projected 2028 emissions, which do not

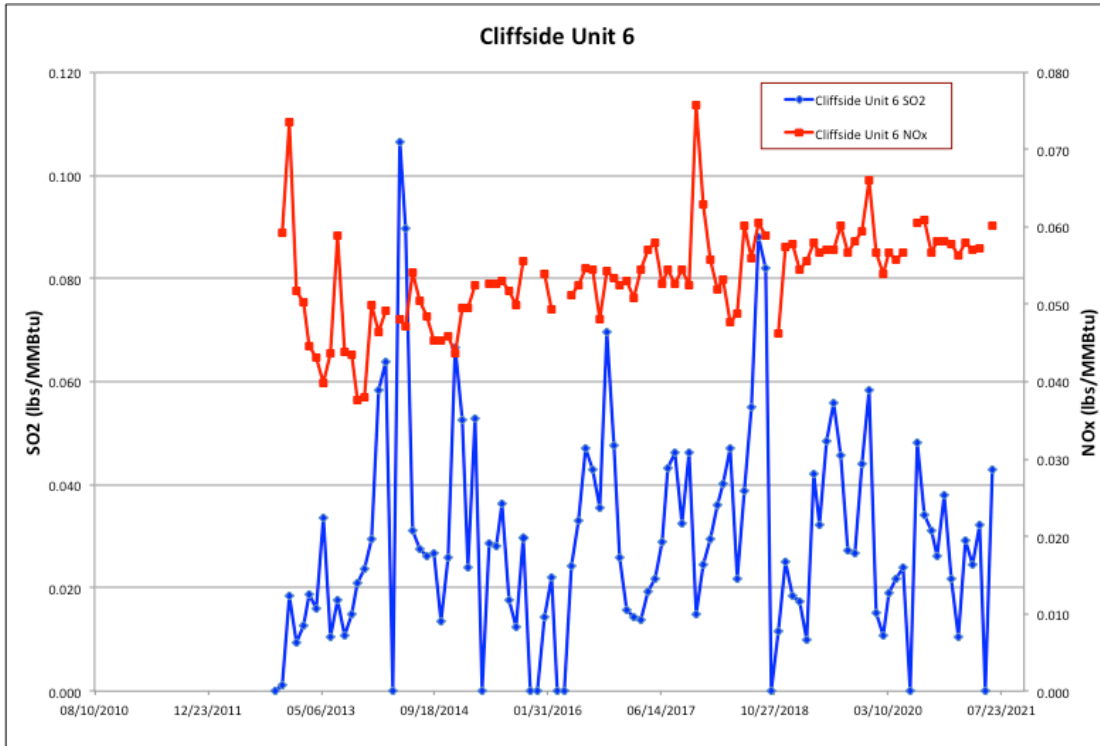
appear to be secured by an enforceable mechanism. Below are 30 day monthly averages for the Cliffside Units.²⁶

Figure 13. Cliffside Unit 5 Historical SO₂ and NO_x Monthly Emissions



²⁶ See the workbook, "NC EGU Emissions.xlsx."

Figure 14. Cliffside Unit 6 Historical SO₂ and NO_x Monthly Emissions



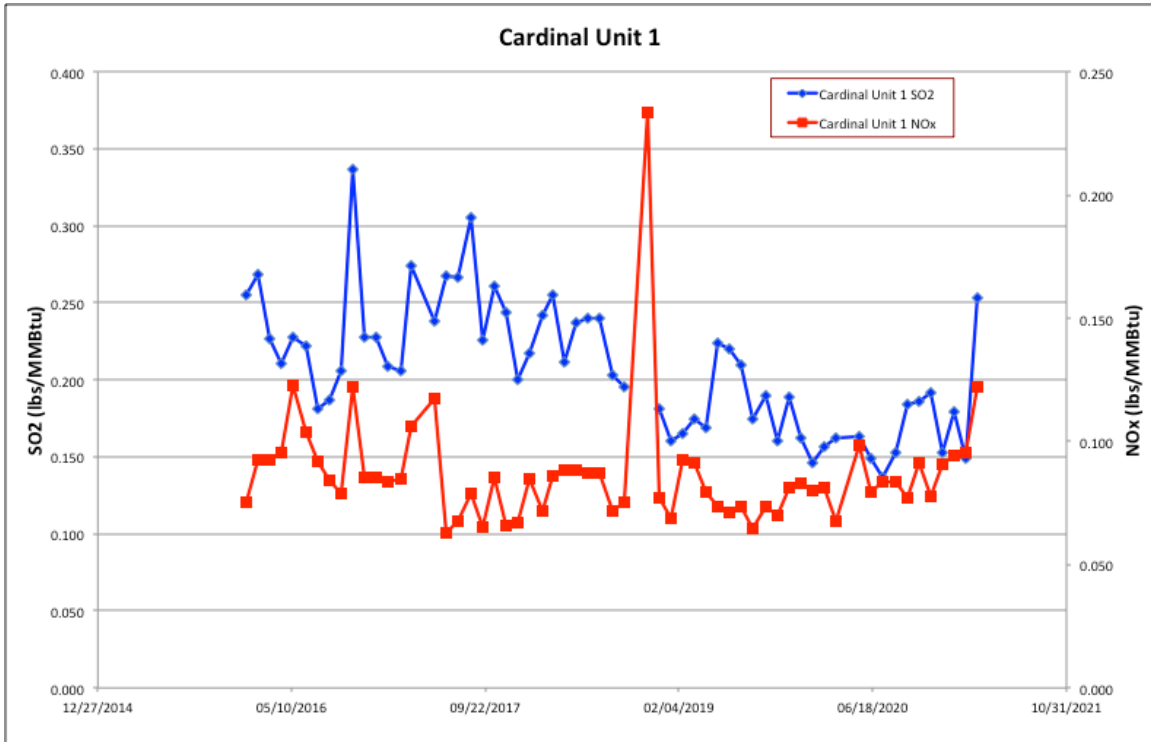
Duke Energy states that in 2018, natural gas was added to the station, allowing up to 40% natural gas co-firing on unit 5 and up to 100% on unit 6. EIA-923 data indicates that both units began using natural gas at the beginning of 2019. Unit 6 appears well controlled for NO_x and SO₂, but has demonstrated the capability to control NO_x slightly below its present levels. Considering that the facility is now burning natural gas in addition to coal, there is likely considerable room for improvement. Unit 5 has demonstrated the ability to consistently control SO₂ to below 0.04 lbs/MMBtu. However, recently Unit 5's SO₂ levels have climbed somewhat. Unit 5 has demonstrated the ability to consistently control NO_x to approximately 0.05 lbs/MMBtu on a monthly basis. However, over the past ten years Unit 5's NO_x level has steadily climbed. Likely, the reason for the lax performance of these control systems is that Cliffside's permit doesn't require better performance. Thus, very cost-effective controls are available for these units for likely just the increase in reagent and potentially better catalyst management and additional electricity for running all absorber pumps. NC DEQ should have required a four-factor analysis for this unit and investigated this issue.

3.5 NC DEQ Should have Objected to Ohio not Improving Controls at the Cardinal EGU

The Cardinal Power Plant in Ohio is listed in Tables 7-31 to 7-35 as having multiple PSAT SO₂ impacts at GRSM of 0.88%, 0.79% at JOYC, 0.61% at LIGO, 0.50% at SHRO, and 1.97% at SWAN. It consists of three coal-fired units of 615 MW, 615 MW, and 650 MW. All are

equipped with wet scrubbers and SCR systems. However, as indicated below, these controls are underperforming. Below are 30 day monthly averages for the Cardinal Units.²⁷

Figure 15. Cardinal Unit 1 Monthly Average SO₂ and NO_x emissions.



²⁷ See the workbook, "OH EGU Emissions.xlsx," worksheet "OH Selected Monthly." Note that in some cases the scales have been modified to separate the SO₂ and NO_x curves.

Figure 16. Cardinal Unit 2 Monthly Average SO₂ and NO_x emissions.

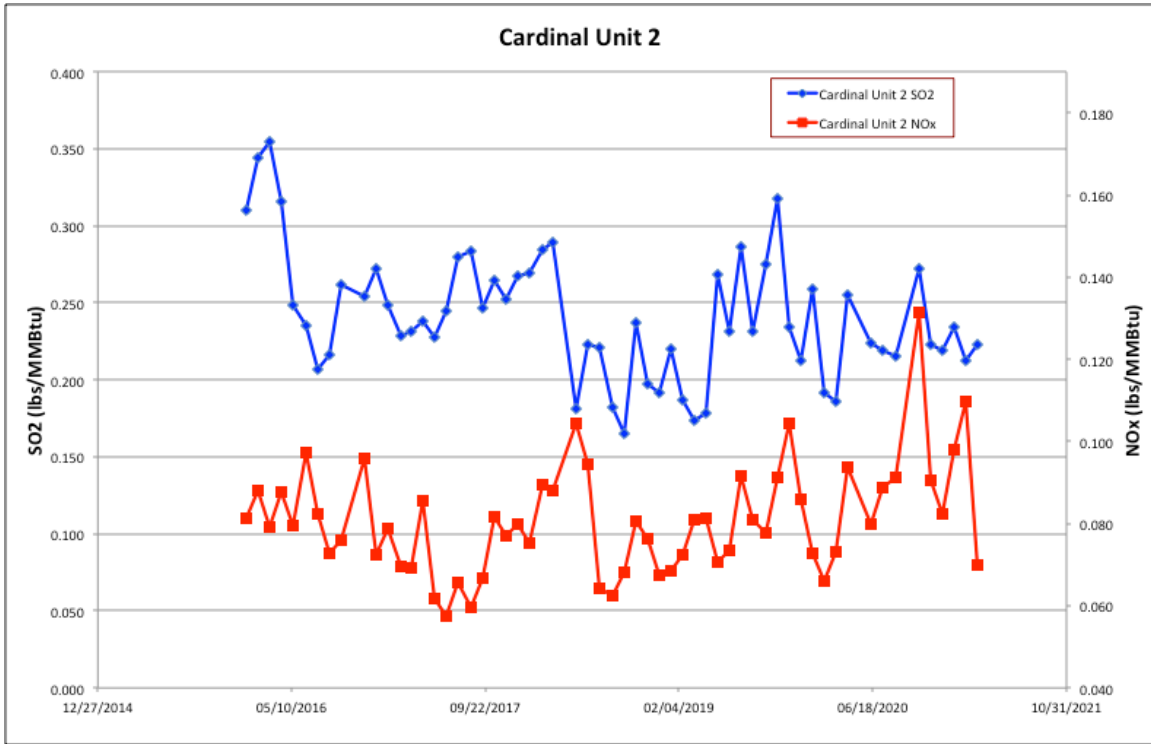
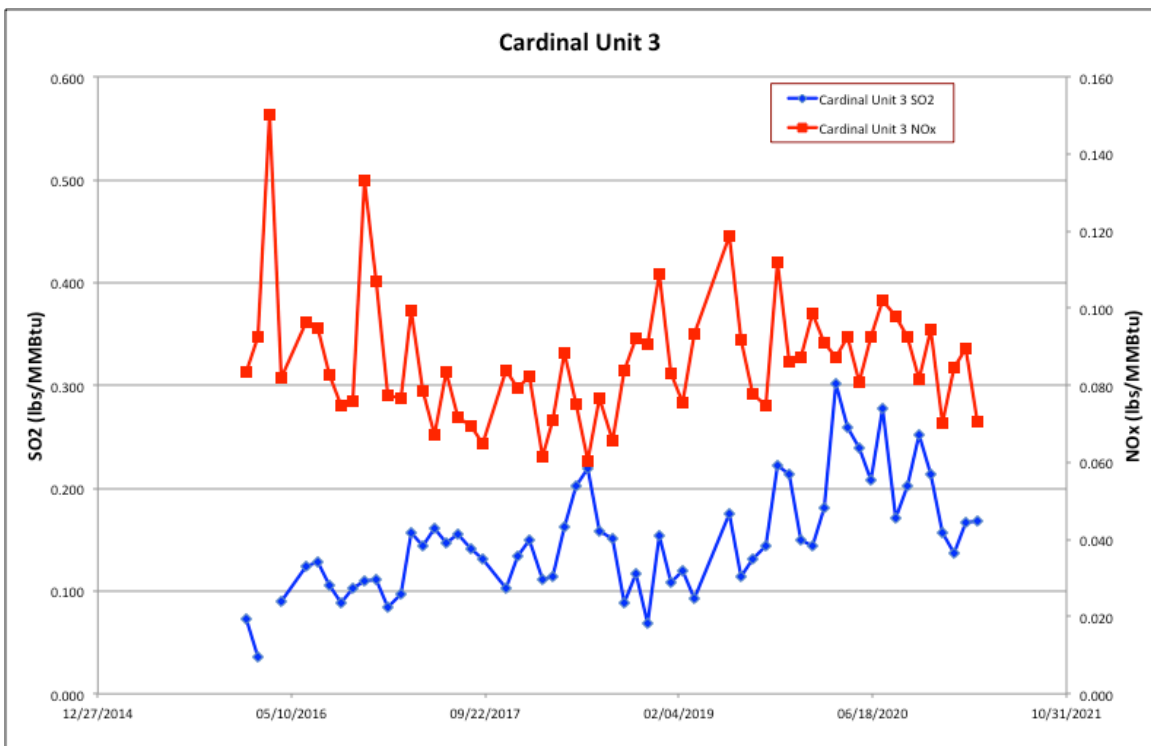


Figure 17. Cardinal Unit 3 Monthly Average SO₂ and NO_x emissions.



It can be seen from the above graphs, that the monthly SO₂ emissions for the Cardinal units are fairly variable, which suggests that Cardinal's scrubbers can be further optimized.

Similar observations can be made regarding the performance of the Cardinal SCR systems. It appears from the above graphs that the performance of Cardinal's SCR systems is suboptimal, with recent monthly NO_x averages typically ranging from 0.06 – 0.12 lbs/MMBtu.

SCR systems can often be upgraded very cost-effectively by selecting catalyst that is better optimized to the SCR inlet temperature, optimizing the ammonia injection system to improve the ammonia mixing and distribution, optimizing catalyst rejuvenation/regeneration, or simply using more reagent. As the Control Cost Manual states,²⁸

Theoretically, SCR systems can be designed for NO_x removal efficiencies up close to 100 percent. In practice, commercial coal-, oil-, and natural gas-fired SCR systems are often designed to meet control targets of over 90 percent. However, the reduction may be less than 90 percent when SCR follows other NO_x controls such as LNB or FGR [Flue Gas Recirculation] that achieve relatively low emissions on their own. The outlet concentration from SCR on a utility boiler is rarely less than 0.04 lb/million British thermal units (MMBtu).

Thus retrofit SCR systems for coal-fired EGUs can typically be relied upon to achieve at least 90% control with a floor of 0.04 lbs/MMBtu. In some cases, coal-fired EGU SCR systems can continuously achieve less than 0.04 lbs/MMBtu on a 30-day rolling average basis. In fact, Cardinal Unit 1 formerly had one of the best performing SCR units in the U.S., as the following graphs indicate:

²⁸ Control Cost Manual, Chapter 2 Selective Catalytic Reduction, June 2019. See pdf page 5.

Figure 18. Cardinal Unit 1 Historical 30 Boiler Operating Day (BOD) NOx Performance

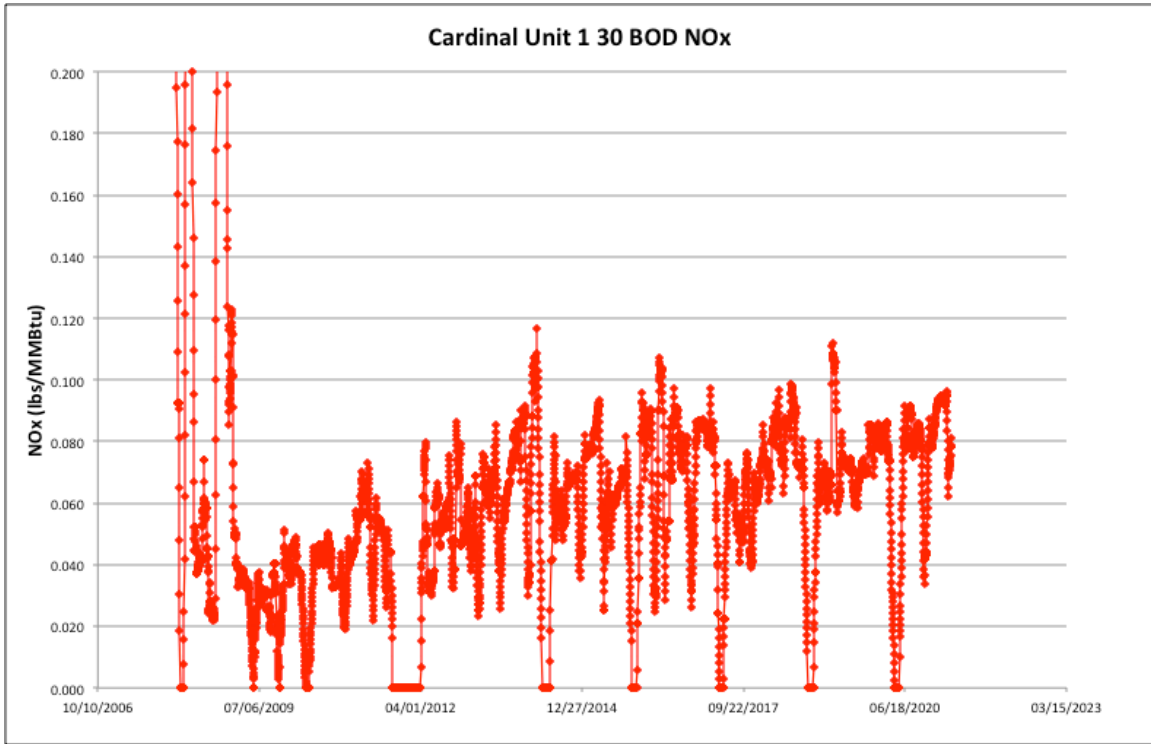
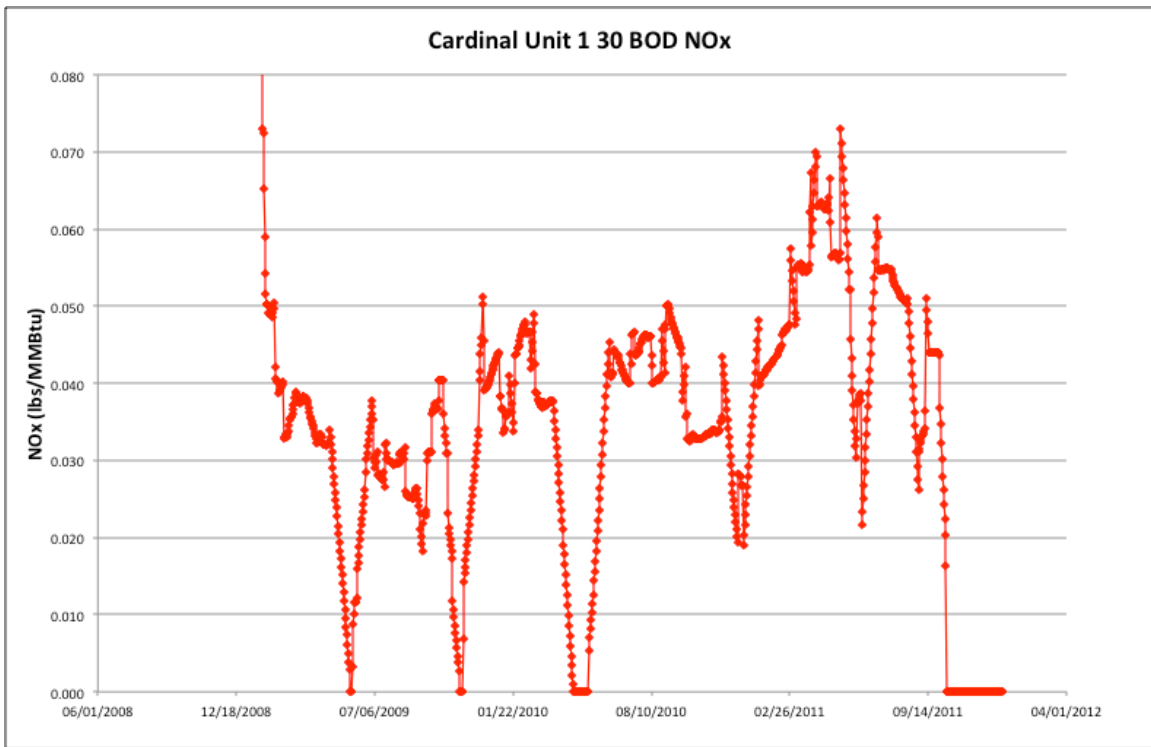


Figure 19. Cardinal Unit 1 Selected Historical 30 BOD NOx Performance



The above figures illustrate the Cardinal Unit 1 SCR system performance during two different time intervals. The NOx emissions are plotted based on a 30 BOD average.²⁹ As can be seen from **Figure 6**, the Cardinal Unit 1's SCR performance has gradually worsened over time. **Figure 7** illustrates the SCR performance for the first two years after it was first installed. As can be seen, the SCR system is capable of sustained performance under 0.04 lbs/MMBtu. An examination of Cardinal Units 2 and 3 SCR systems reveals similar capabilities. In fact, the performance of the Cardinal Units' SCR systems was formerly so good that EPA included it in its survey of the best coal-fired EGU SCR systems to support its New Mexico FIP, which concluded that SCR systems for the San Juan Generating Station were not only cost-effective, but should be required to meet a NOx rate of 0.50 on a 30 BOD average.³⁰ Cardinal's Title V permit does not appear to specify any NOx emission limits for the units that would approach 90% control.³¹ Thus, it appears that the only thing preventing the Cardinal units from achieving this level of SCR performance again is the lack of an enforceable NOx limit requiring it. Consequently, although Ohio performed a four-factor analysis on the Cardinal units, it wrongly concluded no controls were necessary.³² NC DEQ should have objected to this conclusion, as it appears likely that additional NOx reductions could be achieved very cost-effectively. More SO₂ reduction could be a matter of Cardinal simply running its scrubber systems at full capacity continuously or utilizing common scrubber upgrades discussed in another comment.

3.6 NC DEQ Should have Objected to Ohio not Improving Controls at the Kyger Creek EGU

The Kyger Creek Power Plant in Ohio is listed in Tables 7-31 to 7-35 as having multiple PSAT SO₂ impacts at GRSM of 0.85%, 0.74% at JOYC, 0.70% at LIGO, 0.56% at SHRO, and 0.43% at SWAN. It consists of five coal-fired units of 217 MW each. Units 1 and 2 share a scrubber

²⁹ Emissions were downloaded from <https://ampd.epa.gov/ampd/>. EGU emission limits based on rolling 30 BOD averages are preferred over those conditioned based on 30 day running averages because they de-emphasize emission spikes that occur when units are started, shut down, or malfunction. This results from only counting the days when the unit operates in the averaging. Note that EPA states that EGUs should in fact be conditioned on rolling 30 BOD averages in the BART Final Rule (70 FR 39172).

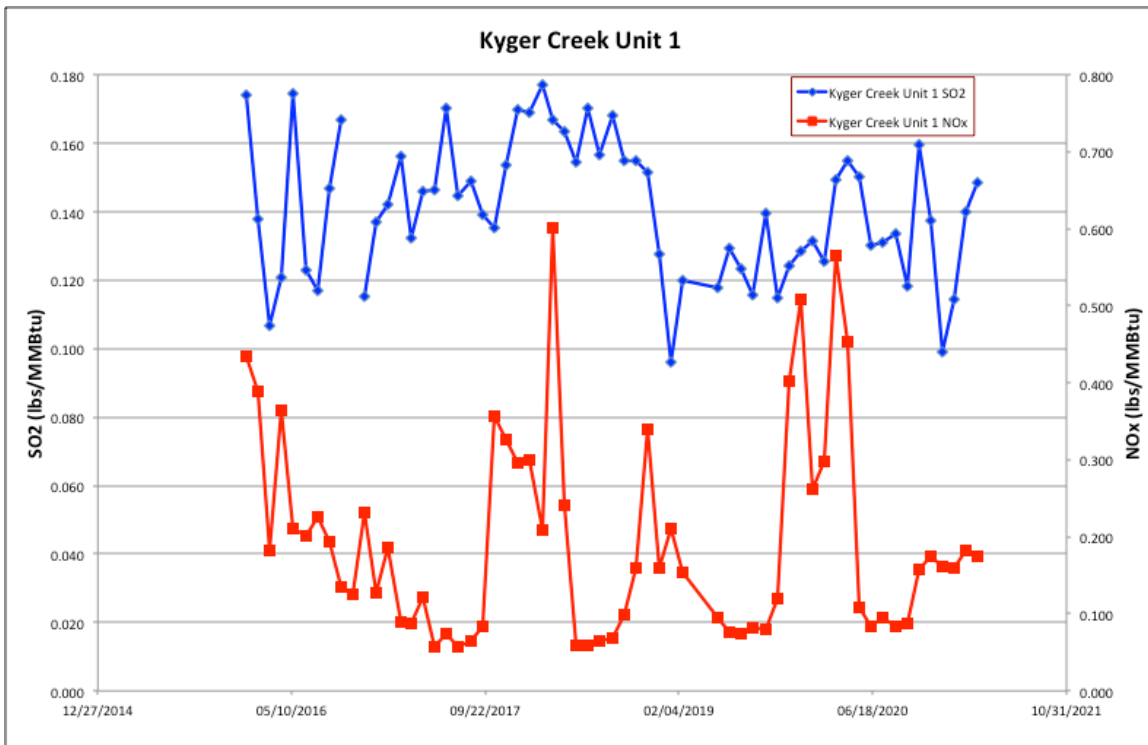
³⁰ See EPA's proposal at 76 FR 491 (January 11, 2011) and its final at 76 FR 52388 (August 22, 2011). In particular, see the discussion at 76 FR 52404: "The Havana Unit 9 data shows that it has operated under 0.05 lbs/MMBtu from mid-2009 to the end of 2010 on a continuous basis. In fact, this unit has operated under 0.035 lbs/MMBtu for much of that time. The Parish Unit 7 data shows that it has operated under 0.05 lbs/MMBtu from mid-2006 to mid 2010 on a continuous basis. In fact, this unit has operated for months at approximately 0.035 lbs/MMBtu, and for approximately 2 years at approximately 0.04 lbs/MMBtu. The Parish Unit 8 data show that it has operated almost continuously under 0.045 lbs/MMBtu since the beginning of 2006. Other units' data show months of continuous operation below 0.05 lbs/ MMBtu. We believe this data demonstrates that similar coal fired units that have been retrofitted with SCRs are capable of achieving NOx emission limits of 0.05 lbs/MMBtu on a continuous basis." Also see this document in which the SCR performance of the Cardinal and other top performing SCR systems discussed above was graphed: <https://www.regulations.gov/document/EPA-R06-OAR-2010-0846-0129>.

³¹ FINAL Division of Air Pollution Control Title V Permit for Cardinal Power Plant (Cardinal Operating Company), Facility ID: 0641050002, Permit Number: P0089700, Permit Type: Renewal, Issued: 01/07/2021, Effective: 01/28/2021, Expiration: 01/28/2026.

³² See Regional Haze State Implementation Plan for the Second Implementation Period, Prepared by: The Ohio Environmental Protection Agency Division of Air Pollution Control, DRAFT May 2021. Page 27.

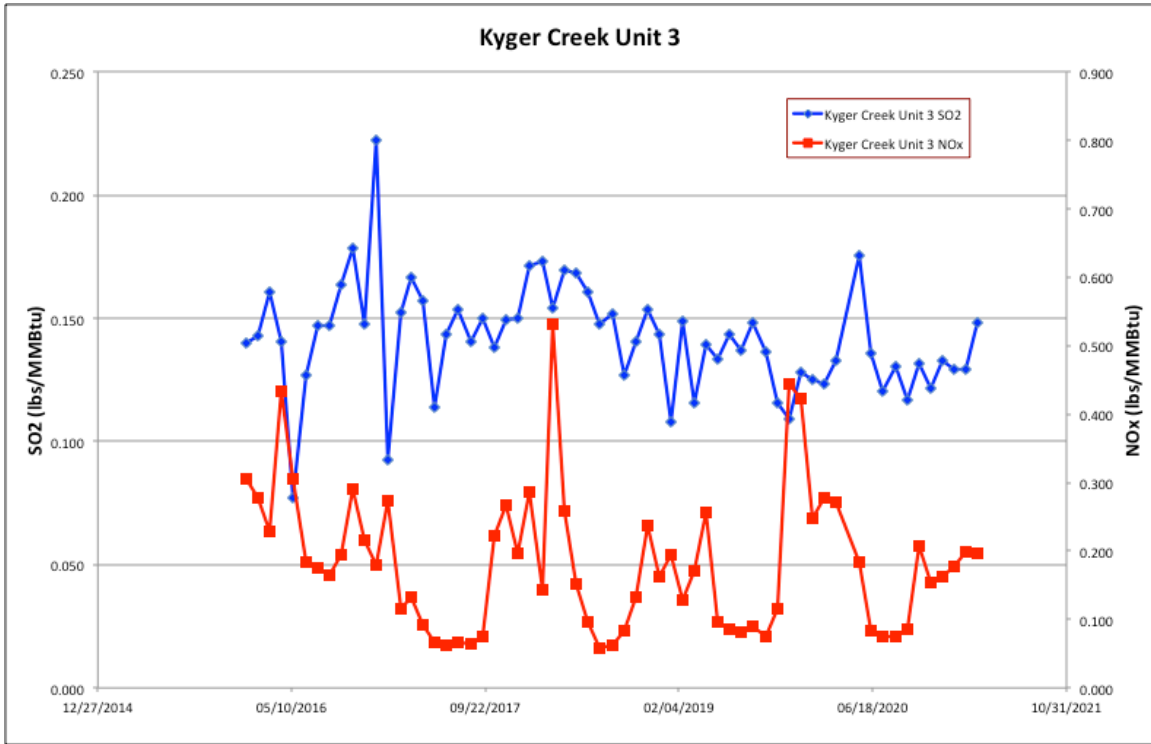
and CEMS and Units 3, 4, and 5 share a scrubber and CEMS. Thus, the monitoring data available from EPA's AMPD website is apportioned and cannot be thought of as being particular to each unit. Analysis indicates the NOx and SO₂ data for Units 1 and 2 are very similar and that for Units 3, 4, and 5 are very similar. Therefore, only monitoring data for Units 1 and 3 are referenced below.³³

Figure 20. Kyger Creek Unit 1 Recent Monthly Average SO₂ and NOx emissions



³³ See the workbook, "OH EGU Emissions.xlsx," worksheet "OH Selected Monthly." Note that in some cases the scales have been modified to separate the SO₂ and NOx curves.

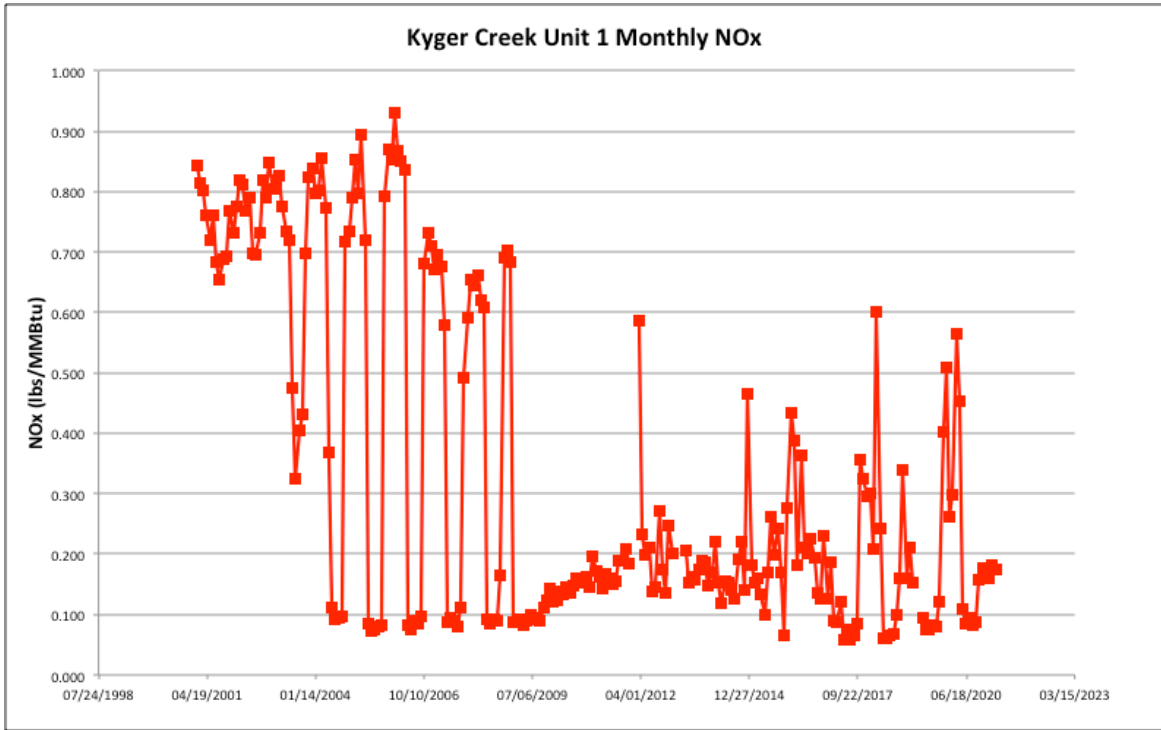
Figure 21. Kyger Creek Unit 3 Recent Monthly Average SO₂ and NO_x emissions



As can be seen from the above graphs, the monthly SO₂ emissions for the Kyger Creek units are fairly variable, which suggests that Cardinal’s scrubbers can be further optimized.

Also, the performance of the Kyger Creek SCR systems alternates between 3-4 month periods of good NO_x removal (approximately 0.06 – 0.08 lbs/MMBtu) with the rest of the time consisting of poor NO_x removal. It seems evident the facility only utilizes its SCR systems at their full capabilities during ozone season. This indicates that the true current performance potential of the Kyger Creek SCR systems is likely at least 0.06 lbs/MMBtu. The pre-SCR NO_x level of Unit 1 is shown below:

Figure 22. Kyger Creek Unit 1 Historical Monthly NOx Emissions



Averaging the monthly NOx rates prior to the SCR installation in May, 2003 yields the following:

Table 7. Kyger Creek Unit 1 Pre-SCR Average Monthly NOx Rates

Month	Year	Avg. NOx Rate (lb/MMBtu)
1	2001	0.843
2	2001	0.814
3	2001	0.802
4	2001	0.761
5	2001	0.719
6	2001	0.761
7	2001	0.684
8	2001	0.654
9	2001	0.687
10	2001	0.694
11	2001	0.768
12	2001	0.733

1	2002	0.775
2	2002	0.820
3	2002	0.811
4	2002	0.767
5	2002	0.790
6	2002	0.699
7	2002	0.694
8	2002	0.732
9	2002	0.819
10	2002	0.789
11	2002	0.849
12	2002	0.804
1	2003	0.820
2	2003	0.827
3	2003	0.775
4	2003	0.734
Avg. Monthly NOx		0.765

Therefore, assuming a relatively consistent coal nitrogen content, and a floor of 0.06 lbs/MMBtu, a gross approximation of the current continuous SCR system performance potential (again when operating during ozone season) is approximately 92%.³⁴

Thus, it appears the only thing preventing the Kyger Creek SCR units from consistently achieving this level of performance is the lack of an enforceable NOx limit requiring it. Consequently, although Ohio performed a four-factor analysis on the Cardinal units, it wrongly concluded no controls were necessary.³⁵ NC DEQ should have objected to this conclusion, as it appears likely that additional NOx reductions could be achieved very cost-effectively. At a minimum simply running its SCR systems at full capacity all year round would likely be very cost-effective. Further SCR optimization may result in even more very cost-effective controls. More SO₂ reduction could be a matter of Kyger Creek simply running its scrubber systems at full capacity continuously or utilizing common scrubber upgrades discussed in another comment.

3.7 NC DEQ Should have Objected to Pennsylvania not Improving Controls at the Seward EGU

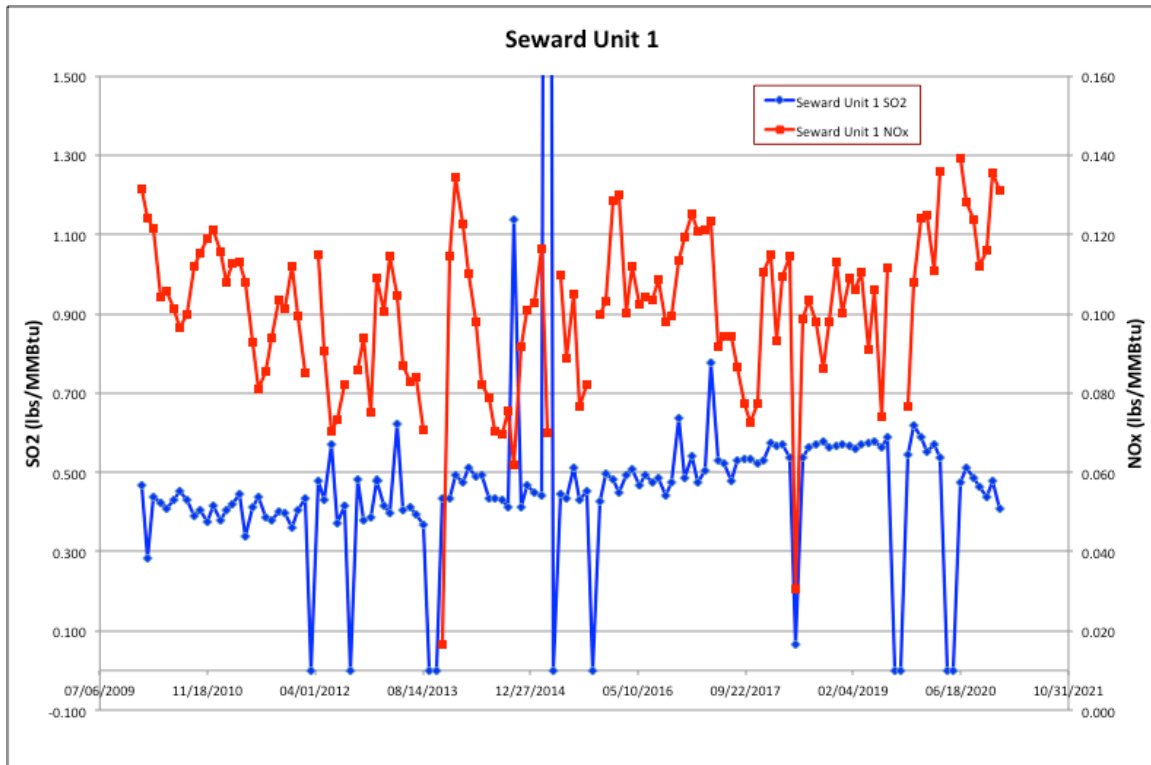
The Seward Power Plant in Pennsylvania is listed in Tables 7-31 to 7-35 as having multiple PSAT impacts at GRSM of 0.31%, 0.29% at JOYC, 0.56% at LIGO, 0.36% at SHRO, and

³⁴ $((0.765-0.060)/0.765) \times 100\% = 92.16\%$. Note that Kyger Creek states on page 4 of Appendix L4, Attachment 1, “the baseline emission rate for Kyger Creek Station boilers prior to SCR installation as defined in 40 CFR Section 76.6, is an emission rate of 0.84 lb/mmBtu.” Based on the emissions noted above, this appears too high.

³⁵ See Regional Haze State Implementation Plan for the Second Implementation Period, Prepared by: The Ohio Environmental Protection Agency Division of Air Pollution Control, DRAFT May 2021. Page 35.

0.99% at SWAN. It consists of two 262.5 MW essentially identical units built in 2004 on the site of a former retired coal-fired power plant. Both units fire waste coal from abandoned coal refuse piles in the area. Seward is also permitted to burn pet coke. Both units utilize circulating fluidized bed combustors, which use limestone to control SO₂ emissions, and are also equipped with Novel Integrated Desulfurization (NID) systems. Both units are also equipped with SNCR to control NO_x. Below are 30-day monthly averages for Seward Unit 1 (Unit 2 is similar since it appears they share a monitor):³⁶

Figure 23. Seward Unit 1 Historical SO₂ and NO_x Monthly Emissions



From the above graphs, it can be seen that the NO_x and SO₂ controls for these units are not operated at a consistent level and are capable of better performance than recently exhibited. For instance, at multiple times, the SNCR systems have controlled NO_x to below 0.8 lbs/MMBtu, but typically operate much above that level. Also, in 2010 – 2012, the NID systems have controlled SO₂ to below 0.4 lbs/MMBtu but have gradually risen over time to approximately 0.6 lbs/MMBtu. Thus, without any capital upgrade cost (and likely minimal operating and maintenance costs), the Seward units are quite capable of much better NO_x and SO₂ performance. It appears the only reason they do not is that they are not required by a permit condition to do so. Additional reductions may also be possible with very moderate and likely

³⁶ See the workbook “NC EGU Emissions.xlsx.”

cost-effective upgrades. NC DEQ should therefore have requested from Pennsylvania that the Seward units undergo four-factor analyses.

4 Review of the Blue Ridge Canton Mill Four-Factor Analysis

In this section, the four-factor analyses for the Blue Ridge Paper Products (BRPP) Canton Mill are reviewed.³⁷ The Title V permit for this facility was also reviewed.³⁸ BRPP focuses on three sources: The Riley Boiler, the No. 4 Power Boiler, and the Riley Bark Boiler.

4.1 NC DEQ should require that the BRPP Canton Mill perform a NOx four-factor analysis

On page 1-2 of its report, BRPP states that “Prior to incorporation of those emissions limits into the permit in September 2019, the Mill spent a significant amount of capital to make changes that decreased actual SO₂ emissions by over 5,000 tons per year.” Elsewhere in a letter to NC DEQ, BRPP elaborates on this:³⁹

BRPP has reduced its SO₂ emissions by thousands of tons since 2016. BRPP has shutdown or modified several major SO₂ emissions sources in order to reduce facility-wide SO₂ emissions. BRPP installed two new gas-fired package boilers and shut down its Big Bill and Peter G coal-fired boilers in 2017, resulting in a reduction in total SO₂ emissions of 2,300 tons per year (tpy). In late 2018, BRPP transitioned the Nos. 10 and 11 Recovery Furnaces from startup and shutdown on No. 6 fuel oil to startup and shutdown on ultra-low sulfur diesel, resulting in an SO₂ emissions reduction of 1,050 tpy. In the summer of 2018, BRPP commenced operation of a new wet scrubber on its Riley Coal Boiler and a new wet scrubber on its No. 4 Power Boiler. The addition of these control devices has resulted in a reduction of SO₂ emissions by 2,050 tpy from Riley Coal Boiler and 1,175 tpy from No. 4 Power Boiler. BRPP optimized the operation of the Riley Bark Boiler's wet scrubber to improve SO₂ emissions control and reduce actual emissions by about 600 tpy. BRPP also installed an SO₂ ambient monitor and completed an SO₂ modeling exercise to establish enforceable permit limits that will be incorporated into the State Implementation Plan (SIP) and ensure these SO₂ emissions reductions are permanent. Average 2014-2016 actual SO₂ emissions were approximately 7,600 tpy but actual 2019 SO₂ emissions were only 405 tons.

The emission control upgrades the BRPP instituted have indeed resulted in significant reductions in SO₂ (potential upgrades to these controls will be discussed in another comment). However,

³⁷ These analyses are located in Appendices G1. These analyses went through revisions and this report's review concentrated on the latest version, dated May, 2021.

³⁸ Permit No. 08961T29, effective 6/2/2020, and expires 10/31/2021. It is assumed this short period reflects a reassessment following a number of performance testing requirements discussed in the permit.

³⁹ Pdf page 13 of Appendix G1.

neither NC DEQ nor BRPP mention the still significant NOx emissions from this facility. Information from NC DEQ, obtained from North Carolina’s public records request process, specifies the trend of the current significant NOx emissions over time (omitting retired sources and refueling):

Table 8. Blue Ridge Paper Products Canton Mill Historic NOx Emissions (tons)

Source	2015	2016	2017	2018	2019
G11039 - Riley Boiler	915.8	972.0	613.0	752.1	681.8
G11040 – No. 4 Power Boiler	543.2	582.5	500.1	547.2	585.9
G08020 – No. 10 Recovery furnace black liquor solids	506.7	525.3	526.2	510.4	506.7
G11042 – Riley Bark Boiler	498.8	294.0	445.4	366.0	394.5
G09029 – No. 5 Lime Kiln	110.9	126.6	114.7	108.6	111.7

As can be seen from the above table, the BRPP Canton Mill has a number of large sources that have not significantly reduced their NOx emissions as was done for SO₂ emissions. As indicated in table 7-29, this facility is located only 16.9 km from SHRO. However, although NC DEQ selected this facility to receive a four-factor analysis for SO₂, it did not require BRPP to assess NOx.⁴⁰ Considering these large NOx emissions, NC DEQ should require that the BRPP Canton Mill perform a NOx four-factor analysis.

4.2 NC DEQ Should Confirm BRPP’s 2028 SO₂ Projections

In Table 7-48 of its SIP, NC DEQ presents the 2019 and projected 2028 SO₂ emissions for the BRPP Canton Mill. NC DEQ does not state how the 2028 SO₂ emissions were projected to 2028. Although it presents the permit limits (in lbs/hr) for each of the three units analyzed, it does not correlate these emission limits to annual totals. It does not appear there are any operational limitations in the facility’s Title V permit that would preclude 24/7 operation. Assuming that is correct, as the following table indicates, the facility’s 2028 SO₂ projections could be potentially low:

Table 9. Comparison of BRPP Canton Mill 2028 SO₂ Projections (tons)

Source	Permitted limit (lbs/hr)	SIP SO ₂ emissions (tons)	Public Records Emissions (tons)	Initial 2028 Projection (tons)	Revised Projection (tons)	Permitted Maximum (tons)
G11039 - Riley Boiler	61.32	115.1	111.6	115.1	183.8	268.6
G11040 – No. 4 Power Boiler	82.22	195.2	226.4	195.2	195.2	360.1

⁴⁰ See the letter from Michael Abraczinskas to Wallace McDonald, dated June 18, 2020 in Appendix G1.

G11042 – Riley Bark Boiler	68.00	55.1	88.5	55.1	64.8	297.8
Total for three units	N/A	365.4	426.5	365.4	443.7	926.5

NC DEQ should confirm whether the facility is permitted to produce these SO₂ totals and if so, why it projected much lower values for 2028. This should include a comparison of historical annual hours of operation for these sources.

4.3 NC DEQ Should Investigate Upgrades to BRPP’s Scrubbers

As indicated above, BRPP has significantly reduced SO₂ at the Canton Mills plant. However, there is little in the facility’s four-factor analysis to demonstrate that the installed/upgraded SO₂ controls are in fact operating at their peak efficiencies. On page 287 of its SIP, NC DEQ states that the wet scrubbers for the Riley Boiler, the No. 4 Power Boiler, and the Riley Bark Boiler are equipped with wet scrubbers with efficiencies of 90%. The facility’s permit states that the scrubber for the Riley Bark Boiler is a venturi wet scrubber, but no information could be found in either the permit, NC DEQ’s SIP, or BRPP’s four-factor analysis that describes the types of scrubbers installed on the other boilers. On page 289, NC DEQ states that it is technically infeasible to upgrade these scrubbers. No information has been presented to document these statements. It appears from the permit that all of these scrubbers are required to undergo performance testing. Therefore, NC DEQ should present this information and assess the performance potential of upgrading these scrubbers. This may be as simple as using more caustic. BRPP states on page 2-5 of its report that this is not possible, but that assertion should be documented and it appears that NC DEQ has the data to do so. BRPP should also evaluate the use of lower sulfur coal as part of its four-factor analyses.

4.4 NC DEQ Should Confirm or Correct Aspects of BRPP’s DSI Cost Analyses

- 4.4.1 In Table A-2 of its report, BRPP indicates that the inlet to a DSI system for the Riley Boiler would be 0.14 lbs/MMBtu. This value is very low and obviously does not reflect uncontrolled coal-fired SO₂. Presumably, since the boiler is equipped with an ESP and some type of scrubber, this value reflects the installation of a DSI system downstream of the existing wet scrubber. BRPP should verify this is the only installation strategy. BRPP states that this figure is based on “Projected 2028 emissions divided by projected 2028 fuel use.” This is a very inaccurate method to arrive at such an important input to the DSI cost analysis, especially considering the required performance testing and monitoring required by its permit. BRPP should provide data to support this figure. A similar comment also pertains to BRPP’s DSI cost-analysis for the No. 4 Power Boiler.
- 4.4.2 On page 2-8 of its report, BRPP justified its 50% DSI SO₂ control stating, “The Sargent and Lundy report indicates that 50% SO₂ control can be achieved when injecting trona prior to an ESP without increasing particulate matter emissions.” However, that figure does not reflect the maximum control efficiency of DSI using an ESP. The same report that BRPP cites indicates that the maximum removal efficiency for milled Trona with an

ESP is 80%. Considering that BRPP recently rebuilt its ESPs, it should do an analysis of whether a higher DSI control efficiency can be achieved. A similar comment also pertains to BRPP's DSI cost-analysis for the No. 4 Power Boiler.

- 4.4.3 In its DSI cost analysis for the Riley Boiler, BRPP should explain its calculation of a 35 MW boiler equivalent, which assumes a 399 MMBtu/hr value with only a 30% efficiency. This efficiency appears low and BRPP should provide documentation for it, as it is a key input into the DSI cost-effectiveness calculation. A similar comment also pertains to BRPP's DSI cost-analysis for the No. 4 Power Boiler.
- 4.4.4 In its DSI cost analysis for the Riley Boiler, BRPP assumes an owners cost of \$257,778. This is a disallowed cost under the Control Cost Manual methodology, which states "owner's costs and AFUDC costs are capital cost items that are not included in the EPA Control Cost Manual methodology, and thus are not included in the total capital investment (TCI) estimates in this section."⁴¹ A similar comment also pertains to BRPP's DSI cost-analysis for the No. 4 Power Boiler.
- 4.4.5 Based on 2%, and 1% of TCI, BRPP assumes general and administrative and insurance costs of \$108,267 and \$54,133 in its DSI cost analysis for the Riley Boiler. These costs may be appropriate when calculating cost-effectiveness using primary design equations, as is done in some chapters of the Control Cost Manual. However, these costs are not part of the standard IPM methodologies (Sargent & Lundy under contract to EPA) and are not appropriate when using those algorithms. All of these algorithms are based on statistical calculations of public and proprietary cost figures and inherently assume these costs. A similar comment also pertains to BRPP's DSI cost-analysis for the No. 4 Power Boiler.
- 4.4.6 The DSI cost figures calculated by BRPP are based on IPM algorithms produced by Sargent and Lundy under contract to EPA. The newest version, used by BRPP, produces costs in 2016 dollars.⁴² On page 291 of its SIP, NC DEQ states, "[t]he calculations were done using 2020 dollars." However, that would require using the Chemical Engineering Plant Cost Index (CEPCI) to make that adjustment and it does not appear that NC DEQ has done that. Doing so would result in a multiplier to the annualized cost of 596.2 / 541.7.

⁴¹ Control Cost Manual, Section 4, Chapter 2, Selective Catalytic Reduction, June 2019, pdf page 65. Also see Section 5, SO₂ and Acid Gas Controls, Chapter 1 Wet and Dry Scrubbers for Acid Gas Control, April 2021, page 1-49.

⁴² See the S&L documentation beginning on pdf page 115 of the BRPP four-factor analyses (Appendix B).

5 Review of the Domtar Plymouth Mill Four-Factor Analysis

In this section, the four-factor analyses for the Domtar Paper Company Plymouth Mill are reviewed.⁴³ The Title V permit for this facility was also reviewed.⁴⁴ Domtar focuses on only one source, the No. 2 Hog Fuel Boiler.

5.1 NC DEQ Should Revisit its SO₂ Control Assumption for the No. 1 Hog Boiler

On page 292 of its SIP, NC DEQ states that the No. 1 Hog Fuel Boiler has not been reviewed for a four-factor analysis due to the following reasoning:

This unit is permitted to combust high-volume low-concentration (HVLC) pulp mill gases but cannot currently do so because the supply lines have been physically severed. The plant intends to maintain this disconnection indefinitely. Since the boiler now burns only low sulfur fuels, it is no longer a significant source of SO₂ emissions. These fuel restrictions and emissions decreases are not state or federally enforceable, but they can be used to inform a reasonable projection of the actual emission level for 2028. For this reason, No. 1 Hog Fuel Boiler is considered to be effectively controlled for SO₂ and was not included in the four-factor analysis evaluation.

As NC DEQ indicates, these fuel restrictions are not state enforceable, despite Domtar's permit being recently revised on June 14, 2021. The permit allows Domtar to burn No. 2 fuel oil and High-Volume Low-Concentration (HVLC) gases. The sulfur restriction on that No. 2 fuel oil is 2.3%, which means that it is not a low sulfur fuel.⁴⁵ Switching to ULSD would qualify as a low sulfur fuel. As Domtar indicates on page 1-5 of its report, these HVLC gases have been the main source of SO₂ emissions from the No. 1 Hog Fuel Boiler. Therefore, unless the permitted capability to burn HVLC in Hog Fuel Boiler 1 is made state and federal enforceable, NC DEQ should evaluate that source for an SO₂ four-factor analysis.

5.2 NC DEQ should Require the Domtar Plymouth Mill Perform a NO_x four-factor Analysis

Neither NC DEQ nor Domtar discuss the significant NO_x emissions from this facility. Information from NC DEQ, obtained from North Carolina's public records request process, specifies the trend of the current significant NO_x emissions over time (omitting retired sources and refueling):

⁴³ These analyses are located in Appendices G2. This analysis went through revisions and this report's review concentrated on the latest version, dated June, 2021.

⁴⁴ Permit No 04291T48, effective 6/14/2021, and expires 5/31/2026. It is assumed this short period reflects a reassessment following a number of performance testing requirements discussed in the permit.

⁴⁵ It appears from its permit that the No. 1 Hog Fuel Boiler is restricted to only 48 hours of No. 2 fuel annually, in order to retain its "unit designed to burn gas 1 subcategory," under 40 CFR 63.7499(I). NC DEQ should confirm this restriction.

Table 10. Domtar Plymouth Mill Historic NOx Emissions (tons)

Source	2015	2016	2017	2018	2019
ES-10-25-0110 – No. 5 Recovery Boiler	918.9	927.6	884.3	756.2	739.6
ES-65-25-0310 No. 2 Hog Fuel Boiler	453.0	483.8	473.0	412.4	460.0
ES-64-25-0290 No. 1 Hog Fuel Boiler	407.0	327.3	360.0	355.4	121.0
Total for three units	1,778.9	1,738.7	1,717.3	1,524	1,320.6

As can be seen from the above table, the Domtar Plymouth Mill has a number of large NOx sources. As indicated in table 7-29 of the SIP, this facility is located only 69 km from SWAN. However, although NC DEQ selected this facility to receive a four-factor analysis, it did not require BRPP to assess NOx.⁴⁶ Considering these large NOx emissions, NC DEQ should require that the Domtar Plymouth Mill perform a NOx four-factor analysis.

5.3 NC DEQ Should Require a Wet Scrubber on Domtar Plymouth Mill’s No. 2 Hog Boiler

On page 294 of its SIP, NC DEQ indicates that the cost-effectiveness of a wet scrubber on the No. 2 Hog Boiler is \$3,660/ton. Despite this control being clearly cost-effective (issues discussed below aside), NC DEQ determines that the control is not warranted because the visibility benefit on SWAN is too low. First, it should be noted that NC DEQ has found that the Domtar facility has impacts, albeit much smaller, on other Class I Areas as well. Therefore, any reductions at Domtar will improve visibility at multiple Class I Areas.

Secondly, EPA’s recent clarification memo indicates that NC DEQ is improperly considering visibility. EPA’s clarification memo also explains that “a state should not use visibility to summarily dismiss cost-effective potential controls.”⁴⁷ The clarification memo further notes that if a state “has identified cost-effective controls for its sources but rejects most (or all) such cost-effective controls across those sources based on visibility benefits [the state] is likely to be improperly using visibility as an additional factor.”⁴⁸ That is exactly the case with North Carolina’s SIP.

It is important that NC DEQ integrate into its SIP strategy the clarification memo’s counsel that “[e]valuation of control measures for relatively smaller sources (with commensurate smaller visibility benefits from each individual source) will be needed to continue making reasonable progress towards the national goal ... as many of the largest individual visibility impairing

⁴⁶ See the letter from Michael Abraczinskas to Wallace McDonald, dated June 18, 2020 in Appendix G1.

⁴⁷ Clarification Memo. See page 13.

⁴⁸ *Ibid.*

sources have either already been controlled (under the RHR or other CAA [Clean Air Act] or state programs) or have retired.”⁴⁹ Therefore, NC DEQ should not reject otherwise feasible and cost-effective controls based on its view that only minimal visibility impacts will result. Thus, NC DEQ should require a wet scrubber on Domtar Plymouth Mill’s No. 2 Hog Boiler.

5.4 NC DEQ Should Increase Domtar’s Wet Scrubber Efficiency

In its wet scrubber cost analysis, Domtar assumes a 95% efficiency. Domtar’s vendor states that its scrubber is a spray tower design but does not state whether its 95% efficiency is in fact the maximum achievable for the scrubber design or merely what was requested by Domtar. In fact, the vendor’s website advertises wet scrubber spray tower designs with an efficiency of up to 99%.⁵⁰ Other vendors offer similar designs and efficiencies.⁵¹ Therefore, unless Domtar and its vendor justify a lower efficiency, NC DEQ should assume that Domtar’s wet scrubber is capable of at least 98% removal on a continuous basis, which is the same as modern wet scrubbers fitted to coal-fired power plants.

5.5 There are a Number of Apparently Incorrect or Undocumented Charges in Domtar’s Wet Scrubber Cost Analysis

5.5.1 Beginning on page 2-7, Domtar discusses why it believes a retrofit factor of 1.3 is justified for its wet scrubber cost analysis. Domtar states:

U.S. EPA indicates that a retrofit factor is appropriate when estimating the cost to install a control system on an existing facility, in order to address the unexpected magnitude of anticipated cost elements; the costs of unexpected delays; the cost of re-engineering and re-fabrication; and the cost of correcting design errors. A retrofit factor can be used to reflect additional difficulty associated with installing auxiliary equipment, special care in placing equipment, additional insulation and painting of piping and ductwork, additional site preparation, extra engineering or supervision during installation, and unanticipated delays that cause lost production costs. The manual [Control Cost Manual] states that at the study cost level, a retrofit factor of as much as 50% is justified, and even at the detailed cost level, a retrofit factor is often added.”⁵²

⁴⁹ *Ibid.*

⁵⁰ See: <https://www.ldxsolutions.com/technologies/wet-scrubbers/>

⁵¹ See for instance: <https://www.bionomicind.com/wet-scrubbers/9500-spray-tower-scrubber.cfm>

⁵² It is important to understand the context in which this last sentence is presented in the Control Cost Manual, Section 1, Chapter 2 Cost Estimation: Concepts and Methodology, November 2017, which is the part of the Control Cost Manual where the subject is discussed. What appears is this statement, intended to be an example of how a retrofit factor is calculated: “The retrofit factor is calculated as a multiplier applied to the TCI. For instance, if a retrofit factor of as much as 50 percent can be justified, then the retrofit factor in the cost estimate is 1.5.”

More specifically, Domtar believes the higher retrofit factor could be justified in order to (1) cover the potential additional cost of an Induced Draft (ID) fan over and above the \$3,000,000 cost Domtar has allowed in its cost analysis, and (2) unanticipated delays.

First, a retrofit factor is a direct multiplier to capital and fixed operating costs and so has a large impact on the total annualized cost. Therefore, it must be well justified. The retrofit factor value assumed in almost all control cost estimating in the first round of regional haze SIP development was 1.0, which represents a retrofit of average difficulty. Almost every control system installation involves replacement of existing structures and involves some demolition of existing structures and construction of new structures. Thus, the potential events described by Domtar are not unusual.

Second, it is important to distinguish between issues that relate to a retrofit factor and those that relate to a contingencies fee. As the Control Cost Manual indicates, “[c]ontingencies is a catch-all category that covers unforeseen costs that may arise, such as ‘... possible redesign and modification of equipment, escalation increases in cost of equipment, increases in field labor costs, and delays encountered in start-up.’”⁵³ The Control Cost Manual also states, “[a] contingency factor should be reserved (and applied to) only those items that could incur a reasonable but unanticipated increase but are not directly related to the demolition, fabrication, and installation of the system.”⁵⁴ Domtar’s stated justification—unanticipated costs and unanticipated delays—should therefore be included in a contingency fee, which it already includes as 10% of (direct costs + indirect costs). The unremarkable issues described by Domtar aside, the addition of a retrofit factor greater than 1.0 would consequently be double counting. Therefore, NC DEQ should require that Domtar’s wet scrubber cost analysis be revised to use a retrofit factor of 1.0.

- 5.5.2 Aside from the vendor quote, no documentation is provided by Domtar to cover many of the other charges included in its cost analysis. NC DEQ should require this documentation.
- 5.5.3 Domtar assumes a sales tax of \$95,610. Under North Carolina law, pollution control equipment is exempt from sales tax.⁵⁵ The quote from the vendor in Appendix B of Domtar’s four-factor analysis is from a sales manager who appears to be located in North Carolina. Therefore, if the sale of the wet scrubber takes place in North Carolina, this charge should be struck.
- 5.5.4 Domtar assumes a freight charge of \$159,350. However, the quote from the vendor lists the estimated freight charge to be \$125,000. NC DEQ therefore should correct this charge.

⁵³ Control Cost Manual, Section 1, Chapter 2 Cost Estimation: Concepts and Methodology. Page 9.

⁵⁴ *Id.*, page 28.

⁵⁵ See <https://www.nccommerce.com/grants-incentives/tax-other-cost-savings#pollution-abatement-equipment-&-recycling>.

- 5.5.5 Domtar assumes a construction management charge of \$344,196, however, the quote from the vendor lists the “construction supervision, on-site services, and training” charge to be \$125,000. NC DEQ therefore should require this charge to be corrected.
- 5.5.6 As indicated earlier, Domtar has assumed the need for a new Induced Draft (ID) fan. However, the vendor states that its quote was based on the use of the existing upstream dry ESP fan and its supplied pressure drop requirements should be confirmed with Domtar’s existing fan manufacturer. Domtar, has assumed an additional \$3,000,000 charge for a new ID fan but has not provided any documentation that such a fan is needed. NC DEQ should require this documentation, since it is a large capital cost item.

Adjusting Domtar’s cost analysis based on the above points yields the following:

Table 11. Revised Domtar Wet Scrubber Cost-Effectiveness

Cost Item	Domtar	Revised	Revised without new ID fan
Direct Costs			
Purchased equipment costs			
Equipment costs - wet scrubber	\$3,187,000	\$3,187,000	\$3,187,000
Sales Tax	\$95,610	\$0	\$0
Freight	\$159,350	\$125,000	\$125,000
Total Purchased Equipment Costs	\$3,441,960	\$3,407,610	\$3,407,610
Direct Installation Costs			
Direct Installation Cost	\$2,925,666	\$2,925,666	\$2,925,666
Installed cost for new fan	\$3,000,000	\$3,000,000	\$0
Total Direct Costs	\$9,367,626	\$9,333,276	\$6,333,276
Indirect Costs			
Construction management	\$344,196	\$125,000	\$125,000
Contractor fees	\$344,196	\$344,196	\$344,196
Start-up	\$34,420	\$34,420	\$34,420
Performance test	\$34,420	\$34,420	\$34,420
Monitor re-certification	\$34,420	\$34,420	\$34,420
Total indirect costs	\$791,652	\$572,456	\$572,456
Contingencies (0.1 x DC + IC)	\$1,015,928	\$990,573	\$690,573
Retrofit factor (0.3 x DC + IC +Cont.)	\$3,352,562	\$0	\$0
Total Capital Investment (TCI)	\$14,527,768	\$10,896,305	\$7,596,305
Total Direct Annual Costs	\$2,241,505	\$2,241,505	\$2,241,505

Indirect Annual Costs			
Overhead	\$67,260	\$67,260	\$67,260
General and admin (2% of TCI)	\$290,555	\$217,926	\$151,926
Insurance (1% of TCI)	\$145,278	\$108,963	\$75,963
Capital recovery (0.0527 x TCI)	\$765,613	\$574,235	\$400,325
Total Indirect Annual Costs	\$1,268,706	\$968,384	\$695,474
Total Annual Costs	\$3,510,211	\$3,209,889	\$2,936,979
Cost-effectiveness			
2028 SO ₂ Emissions (tons)	1,009.6	1,009.6	1,009.6
Removal efficiency	95.0%	98.0%	98.0%
Controlled SO ₂ Emissions (tons)	959.1	989.4	989.4
Cost-effectiveness (\$/ton)	\$3,660	\$3,244	\$2,968

Two revised cost-effectiveness variations are presented: one with a new ID fan and one without a new ID fan. In both revisions, revised values for the sales tax, freight, construction management, retrofit factor, and removal efficiencies were entered. As can be seen, keeping the undocumented ID fan resulted in a cost-effectiveness reduction from Domtar’s \$3,660/ton to \$3,244/ton. Removing the undocumented ID fan further reduced the cost-effectiveness to \$2,968/ton. Therefore, NC DEQ’s improper rejection of Domtar’s wet scrubber aside, Domtar’s cost-effectiveness calculation is demonstrably high.

6 Review of the PCS Phosphate Aurora Plant

In this section, the four-factor analyses for the PCS Phosphate Aurora Plant are reviewed.⁵⁶ The Title V permit for this facility was also reviewed,⁵⁷ as was the consent decree.⁵⁸ PCS Phosphate focuses on Sulfuric Acid Plants 5, 6, and 7.

6.1 NC DEQ Should not Assume Unsecured SO₂ Reductions

Information from NC DEQ, obtained from North Carolina’s public records request process, indicates that the SO₂ emissions from Acid Plants 5, 6, and 7 were 701 tons, 565 tons, and 852 tons, respectively for a total of 2,118 tons. On page 295 of its SIP, NC DEQ projects the revised 2028 SO₂ emissions for Sulfuric Acid Plants 5, 6, and 7 as 792 tons, 852 tons, and 1,232 tons, respectively for a total of 2,876 tons. These projections were discussed by PSC Phosphate in a

⁵⁶ These analyses are located in Appendices G3.

⁵⁷ Permit No 04176T62, effective 4/1/2021, and expires 12/31/2022. It is assumed this short period reflects a reassessment following a number of performance testing requirements discussed in the permit.

⁵⁸ See <https://www.epa.gov/sites/default/files/2014-11/documents/pcsnitrogenfertilizer-cd.pdf>.

letter to NC DEQ.⁵⁹ In that letter, PCS Phosphate explained that following upgrades (at least in part required to meet emission restrictions in its consent decree), it reduced its emissions to below the limits required by the consent decree. The consent decree required that Sulfuric Acid Plants 5, 6, and 7 meet annual emissions of 2.5, 2.5, and 1.75 lbs SO₂/ton sulfuric acid, respectively. However, PCS Phosphate indicates in Table 2 of that letter that the actual emission rates were 1.4, 1.3, and 1.3 lbs/ton sulfuric acid. It adds that catalyst is replaced every three years to ensure these emission rates. Therefore, PCS reasons it is proper to project 2028 emissions on the basis of a 1.4 lbs SO₂/ton sulfuric acid multiplied by the maximum annual acid production rate (from previous five years) in tons and converted to tons of SO₂ emitted.⁶⁰ NC DEQ accepted this reasoning and the resulting figures are its 2028 SO₂ projections noted above. The following comments pertain to this issue:

- No calculations were presented to verify PCS Phosphate's 2028 projections.
- There is no permit condition requiring that the acid plants replace their catalyst every three years in order to meet PCS Phosphate's cited emission rates.
- PCS Phosphate's Title V permit does not limit the emissions to the cited 1.4 lbs SO₂/ton sulfuric acid figure. Instead, that permit limits the acid plants to the consent decree requirements.
- The only annual SO₂ limitations for the acid plants in the Title V permit are the result of the facility apparently having used projected actual emissions to avoid applicability of Prevention of Significant Deterioration requirements for two different projects.⁶¹ In those instances, PCS Phosphate projected SO₂ totals for the three acid plants to be 5,307 tons and 5,101 tons.

PCS Phosphate's four-factor analysis concludes that following its consent decree upgrades to Sulfuric Acid Plants 5, 6, and 7, no additional controls are technically feasible. This report concludes that is likely the case. However, as indicated above, PCS Phosphate has presented evidence that the three acid plants are capable of operating significantly below their current permitted limits. NC DEQ has accepted this information and in fact conducted its four-factor analyses on the basis of it. However, there is no enforceable commitment that the plant will meet its 2028 SO₂ projections. EPA discusses this situation in its Clarification Memo:⁶²

The existence of an enforceable emission limit or other enforceable requirement (e.g., a work practice standard or operational limit) reflecting a source's existing measures may also be evidence that the source will continue implementing those

⁵⁹ Letter from Mark Johnson to Michael Abraczinskas, dated 5/14/2020, in Appendix G-3.

⁶⁰ NC DEQ states on page 297 of its SIP that in fact emission rates following the upgrades were 1.1, 1.2, and 1.2 lbs SO₂/ton sulfuric acid, based on 180 day averages. However, it does not appear these figure were used in constructing the 2028 SO₂ projections.

⁶¹ See pages 130 – 131 of the PCS Phosphate Aurora Title V Permit.

⁶² Clarification Memo, page 9.

measures. A federally enforceable and permanent requirement provides the greatest certainty and, therefore, is the preferred and best evidence. EPA will consider these and other types of limits and operational requirements as part of its weight-of-evidence evaluation. To be relevant, the limit should reflect the emission rate the source is actually achieving with its existing measures. A limit that is significantly higher than the emission rate a source is actually achieving does not keep the source from increasing its rate in the future. States should provide information on any enforceable emission limits associated with sources' existing measures. States should also clearly identify the instrument in which the relevant limit(s) exist (by providing, e.g., the applicable permit number and where it can be found) and provide information on the specific permit provision(s) on which they are relying. If the instrument is not publicly available or readily accessible, a state should provide a copy of the instrument to EPA with its SIP submission.

This exactly describes the PCS Phosphate situation. Therefore, if it is to rely on and accept PCS Phosphate's emissions estimates, NC DEQ should commit in its SIP that it will incorporate significantly lower SO₂ limits for the three acid plants into PCS's Phosphate's permit, either through modification or a prompt renewal.

7 Apparent Errata

- Many internal references to tables and figures in the SIP appear to be in error.
- Figures 1-2 and 1-3 depict light extinction by species on the 20% most impaired and the 20% clearest days, respectively for GRSM, LIGO, SHRO, and SWAN. However, these figures do not include the JOYC. Since this appears near the beginning of the SIP, NC DEQ should indicate that JOYC assumes the monitored data from GRSM.
- On page 231, NC DEQ states, "The NCDAQ reviewed the 37 facilities identified in Table 7-19 through Table 7-23 with an AoI contribution of $\geq 1\%$ for sulfate and nitrate combined for one or more of the Class I areas in North Carolina." The intended table citation appears to be Tables 7-20 to 7-24, inclusive. Also, it appears there are 69 facilities with an Area of Influence (AoI) contribution of $\geq 1\%$ for sulfate and nitrate combined for one or more of the Class I areas in North Carolina.
- In Table 7-31, it appears that the "Final Revised EGU+NEG (Mm-1)" column is presented twice and all cells have the same value of 13.2255 Mm-1. Similar issues exist in Tables 7-32 through 7-35.
- On page 266, it appears that the last sentence in the next to the last paragraph should read, "Of this total point source facility impact, ~~the~~ seven (7) facilities have a sulfate contribution $\geq 1.00\%$ and account for 11.3% of the point source sulfate plus nitrate visibility impact in 2028." Sentences in successive paragraphs should similarly be revised, table references should be revised, and the number of facilities with an impact of at least 1% at Joyce Kilmer-Slickrock Wilderness Area should be "8".

Enclosure 2

**Technical Review of North Carolina Regional Haze State Implementation Plan
Second Round of Regional Haze State Implementation Plans
Supplemental Report**

By: D. Howard Gebhart, October 2021

This report provides technical comments on the draft State Implementation Plan (SIP) for Regional Haze in the State of North Carolina, with a focus on air quality modeling and how the modeling results were applied by North Carolina, e.g. the selection of emissions sources for consideration of additional emission controls through the so-called “four factor” analysis.

This report is supplemental to a separate technical report that has been prepared with respect to modeling performed by VISTAS (Visibility Improvement - State and Tribal Association of the Southeast). The VISTAS modeling effort relied mainly upon the Comprehensive Air Quality Model with Extensions (CAMx) and was jointly conducted by Eastern Research Group and Alpine Geophysics. CAMx modeling was conducted for a 2011 baseline period plus a future-year emission projection representing 2028. The supplemental report provided here is intended to address issues specific to how the VISTAS modeling was used and applied in the development of the proposed North Carolina Regional Haze SIP.

Because North Carolina relied on the VISTAS visibility modeling in preparing the current draft of the Regional Haze SIP, the technical comments provided in the separate VISTAS modeling report are also applicable to the proposed North Carolina Regional Haze SIP.

The North Carolina Regional Haze SIP fails to address important contributors to visibility impairment at North Carolina’s Class I areas and as such, fails to generate “reasonable progress” toward the national goal of achieving natural visibility conditions.

Following the general modeling approach outlined by VISTAS, North Carolina has used a two-step process in its attempt to identify potential sources contributing to existing visibility impairment at North Carolina’s Class I areas. The first step, known as the “area of influence” (AOI) analysis, was used as an initial screen to select sources which would then be subject to more detailed modeling via CAMx and the Particulate Matter Source Apportioning Technology (PSAT) module. Some general comments on the flaws of this two-step modeling approach have been discussed in the separate report providing comments on the VISTAS modeling.

In general, the overall modeling approach developed under VISTAS and then applied by North Carolina was overly restrictive. As such, the modeling failed to identify many of the point sources that significantly contributed to visibility impairment at North Carolina’s Class I areas.

Specifically, the VISTAS modeling appeared to have been developed as an attempt to eliminate all but the most significant contributing sources from conducting the “four factor” analysis. However, a major goal of the second-round regional haze SIP planning effort was to assess the feasibility of emission controls designed to reduce visibility precursors emissions and achieve “reasonable progress” at reducing visibility impairment. North Carolina’s modeling approach should have been designed to be more inclusive, which in turn would have designated many more emission sources for evaluation of possible emission controls.

The actual outcome presented in the draft Regional Haze SIP itself was the evidence that North Carolina’s process was not properly inclusive at identifying emission sources contributing to ongoing visibility impairment. In the draft Regional Haze SIP, North Carolina presented various statistics for the sources identified in the SIP for further evaluation via the “four factor” analysis.¹

Using Great Smoky Mountains National Park (GRSM) as an example, the draft SIP stated that the two-step modeling approach identified seven (7) individual facilities where the modeled PSAT contribution was greater than the selected threshold of visibility impairment, i.e., 1% of the overall sulfate/nitrate contribution. Furthermore, the draft SIP stated that the seven identified facilities represented 11.3% of the point source sulfate/nitrate and that point source sulfate/nitrate represented 28.9% of the modeled visibility impairment. Combining these statistics, the emission sources identified by North Carolina for evaluation of possible emission controls via the “four-factor” analysis represented only 3.2% of the overall visibility impairment at GRSM on the 20% most-impaired days.²

Following the same approach, the fraction of the visibility impairment contributed by emission sources identified by North Carolina for evaluation of emission controls via the “four-factor” analysis was calculated below for each Class I area.

North Carolina Class I Area	Number of Sources (includes out-of-state emission sources)	Fraction of Existing Visibility Impairment based on PSAT Modeling
Great Smoky Mountains NP	7	3.2%
Joyce Kilmer-Slickrock	7	3.5%
Linville Gorge	11	5.8%
Shining Rock	13	5.0%
Swanquarter	10	4.9%

A more inclusive process could have been achieved by North Carolina by following one or more of the approaches selected below:

- North Carolina should have selected a lower threshold (e.g., lower than 1% contribution for sulfate/nitrate via PSAT) in order to identify more contributing sources and capture a larger fraction of the existing of the visibility impairment. The selected threshold should have been reduced by North Carolina as needed in order to capture a significant number of contributing emission sources, thereby assuring “reasonable progress” during the second SIP planning period.

¹ North Carolina Draft Regional Haze SIP, Pages 266-2679

² $(0.113) * (0.289) = 0.032 = 3.2\%$

- North Carolina should have placed more reliance on the initial AOI analysis to select the sources contributing to visibility impairment, which could have avoided the need to conduct the second-step PSAT modeling. The AOI modeling provided useful information by identifying those sources whose emissions would be transported to nearby Class I areas. A finding that a source’s emissions impacted a Class I area via the AOI modeling should have been sufficient for North Carolina to designate the source as a significant contributor to visibility impairment. North Carolina’s reliance on the VISTAS PSAT modeling as the sole source of data to define contributing sources was misguided and overly restrictive.

Similar comments that North Carolina should have relied more heavily on the AOI modeling analysis were also presented by the National Park Service, which presented its own evaluation of the North Carolina AOI modeling results.³ Based on the NPS AOI analysis, all of Duke Energy’s coal-fired electrical generating units (EGUs) located in North Carolina would have been selected for the four-factor emissions control analysis.

Also, it should be noted that the VISTAS modeling relied upon by North Carolina only identified facilities designated as “contributing sources”. Once designated, the “contributing sources” were evaluated for possible installation of new/improved emission controls via the “four-factor” analysis. However, designating a “contributing source” via modeling did not automatically mean that new/improved emission controls would be required via the SIP.

Only a small number of facilities were identified by North Carolina for evaluation of new/improved emission controls via the “four-factor” analysis. Furthermore, the draft Regional Haze SIP as proposed by North Carolina did not require new/improved emission controls at most of the designated contributing sources. As a result, the second round Regional Haze SIP did not provide for any significant reductions of visibility precursor emissions. Because the second-round Regional Haze SIP failed to require installation of new/improved emission controls at the majority of sources identified as contributing to existing visibility impairment, the draft SIP by default failed to achieve “reasonable progress” toward improving visibility. As such, the North Carolina Regional Haze SIP in its present form would not conform with the underlying federal regulations and cannot be approved.

The Fractional Bias Analysis presented by North Carolina was flawed as it was predicated on the unsubstantiated assumption that the PSAT modeling results were a true and accurate representation of the existing visibility impairment at North Carolina’s Class I areas.

In the draft Regional Haze SIP, North Carolina presented a comparison of the modeling results between the AOI and PSAT analysis and charted the comparisons as a function of downwind distance between the facility of interest and the Class I area, e.g., the so-called Fractional Bias Analysis⁴. Based on this flawed analysis, North Carolina made the claim that the AOI modeling overestimated the contribution of sources to Class I visibility impairment, especially in cases where the source was close to the Class I area of interest; i.e, less than 100 kilometers (km).

³ NPS Response to VISTAS Source Selection and Technical Analysis for Regional Haze SIP Development, May 14, 2021

⁴ Draft North Carolina Regional Haze SIP, Page 262

The Fractional Bias Analysis was flawed because the comparisons made by North Carolina were nothing more than a comparison of the AOI and PSAT modeling results. The North Carolina claim that the AOI analysis overestimated visibility impacts was predicated on the unsubstantiated assumption that the PSAT results were somehow a true and accurate representation of the real-world visibility impacts.

As such, the North Carolina Fractional Bias Analysis did not follow proper scientific principles. It would be wholly improper to compare two different modeling results and then make statements about the alleged accuracy of one of those modeling results. Based on the information provided, one would be equally justified to claim instead that the PSAT modeling results were underestimated at close-in distances. The Fractional Bias Analysis as presented by North Carolina had no valid scientific basis and as such should be deleted from the SIP.

There are also serious technical concerns about whether the PSAT modeling results were an accurate representation of visibility impacts from the individual emission sources. These concerns are especially pronounced for facilities located in close proximity to the Class I areas. In some cases, the separation distance between facilities of interest and the closest Class I area was as small as 16 km. Other sources of interest were located at distances of 32 km and 52 km from the nearby Class I area.

- Based on the Federal Land Managers' Air Quality Values Workgroup (FLAG) guidance⁵, regional grid models like CAMx are not the preferred model where the Class I separation distance is less than 50 km. Inside 50 km, the FLAG-recommended visibility models address direct plume impacts and not contributions to light extinction from sulfate and nitrate. By relying only on CAMx/PSAT, the selection of contributing sources in the draft SIP did not consider direct visibility impacts to Class I areas closer than 50 km.⁶
- The CAMx grid size used in the VISTAS visibility modeling was 12 km⁷. For emission sources located as close as 16 km to the Class I area, a 12 km grid size is insufficient to resolve the details of emissions plume and generate accurate concentration estimates for the source in question. For any emission source within 50 km of the Class I area, the Class I areas are only 1-3 grid cells away from the source of interest. The CAMx model performance degrades substantially at these close-in distances. North Carolina erred by relying solely on the CAMx PSAT results for sources within 50 km of a Class I area.
- The VISTAS CAMx model performance evaluation⁸ documented that sulfate concentrations were substantially underpredicted vs. actual measurements. The sulfate underprediction in CAMx would also carry over to the PSAT modeling.

⁵ Federal Land Managers' Air Quality Values Workgroup Guidance (FLAG), Phase I Report, December 2000.

⁶ Based on the Draft SIP (Tables 7-20 through 7-24), eight facilities are located closer than 50 km to one or more North Carolina Class I area (four in NC and four in TN): SGL Carbon, Blue Ridge Paper – Canton Mill, Asheville Plant, PCS Phosphate – Aurora, McGhee Tyson, Cemex – Knoxville, Tate & Lyle, and Alcoa South Plant

⁷ Regional Haze Modeling for Southeastern VISTAS II Regional Haze Analysis Project – Final Modeling Protocol, June 27, 2018.

⁸ Model Performance Evaluation for Particulate Matter and Regional Haze of the CAMx 6.40 Modeling System and VISTAS II 2011 Updated Modeling Platform for Task 8.0, Final Report October 29, 2020.

In summary, North Carolina's attempt to use the flawed Fractional Bias Analysis and ignore the findings of the AOI modeling was misguided. The PSAT model results are themselves model estimates and North Carolina's claim that the PSAT results were an accurate measurement of source-specific visibility impacts was inappropriate. Furthermore, the PSAT results were very suspect at close-in distances. North Carolina should have recognized that the AOI modeling provided useful information to aid in the identification of emission sources that contributed to visibility impairment at North Carolina's Class I area, i.e., the AOI analysis identified those sources whose emissions would be transported to nearby Class I areas. A finding that a source's emissions impacted a Class I area via the AOI modeling should have been sufficient for North Carolina to designate sources identified via this analysis as significant contributors to visibility impairment.

At many larger emission sources in North Carolina, the draft Regional Haze SIP listed 2028 emissions projections where the emissions were substantially less than current emission estimates. The basis for these emission reductions was not adequately explained by North Carolina, nor did the draft SIP contain enforceable limits which would have restricted source emissions to the levels used in the 2028 emission projections.

As reported by the technical analysis presented by Mr. Joe Kordzi,⁹ the future emission projections used in the VISTAS modeling relied upon by North Carolina for the draft Regional Haze SIP listed 2028 emissions data where the emissions were substantially less than current emissions.

The technical basis for the 2028 emissions data used by North Carolina was not fully documented, especially given that substantial emission reductions were noted at many large sources, but no analysis of new/improved emission controls was ever conducted. In the absence of new/improved emission controls or facility retirements, the 2028 projections listing a substantial reduction in emissions from current levels were unjustified and suspect. Furthermore, any such emission reduction relied upon by North Carolina in developing the draft Regional Haze SIP needed to be made federally-enforceable via the SIP and/or modified permits. No enforceable commitments related to the claimed emission reductions appeared in the draft SIP.

Furthermore, there is concern that some or all of the emission reductions inferred by the 2028 projections resulted from assumed changes in load and/or utilization at the underlying emission unit. If the 2028 emission reductions relied upon by North Carolina were tied to reductions in load/utilization, such changes were not properly reflected in the VISTAS modeling. In the real-world, baseline hourly emissions would likely remain unchanged, although emissions might occur at a reduced frequency if the source load were reduced. However, the VISTAS CAMx modeling erroneously treated any and all 2028 emissions reductions as a percent reduction in baseline emissions across all hours of operation. Given these errors, the 2028 visibility modeling projections presented in the North Carolina Regional Haze SIP are inherently unreliable because the projections are based on suspect emissions data and also rely on emission reductions that have not been made federally-enforceable.

Please refer to the technical report specific to the VISTAS modeling for further discussion of this issue.

⁹ Technical comments from Mr. Joseph Kordzi

D HOWARD GEBHART

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EDUCATION

M.S. Meteorology, University of Utah 1979

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MEMBERSHIPS

Air & Waste Management Association

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EXPERIENCE SUMMARY

Mr. Gebhart has over 39 years' experience in air quality permitting and compliance specializing in issues technical and regulatory affecting regulated industries. Howard manages the environmental compliance section at ARS, where he provides technical studies and evaluations; and prepares models, client permit applications, air emission calculations, and performs multi-discipline environmental audits. He is very experienced in working with the federal Clean Water Act, Clean Air Act, Resource Conservation and Recovery Act (RCRA), and similar programs enacted in states throughout the U.S.

Howard also acts as an Expert Witness in legal proceedings involving the Clean Air Act and is a recognized technical expert in air dispersion modeling.

PROJECT EXPERIENCE

- Manages the Environmental Compliance Section team.
- Produces and manages quality assurance documents including quality management plans and quality assurance project plans.
- Provides technical studies and evaluations, including air dispersion modeling, permit application preparation, emissions inventories, regulatory analysis and interpretation, and environmental audits.
- Prepares applications for new source permits under federal Prevention of Significant Deterioration (PSD) and state construction and operating permit programs.
- Provides technical studies supporting Environmental Impact Statements (EISs) and Environmental Assessments (EAs) under the National Environmental Policy Act (NEPA).
- Performs air pathway evaluations for releases of hazardous air pollutants from Superfund sites, hazardous waste sites, and incinerators. Models the potential consequences of accidental releases of hazardous materials.
- Performs multi-discipline environmental audits at regulated industrial facilities.
- Manages air quality and environmental permitting studies for biofuel (ethanol and biodiesel), oil & gas exploration and production, mining and minerals, general manufacturing, and a variety of other industries with experience representing both government and private-sector clients.

Enclosure 3

Technical Review of VISTAS Visibility Modeling for the Second Round of Regional Haze State Implementation Plans

By: D. Howard Gebhart, May 2021

Introduction and Background

This report provides a technical review of the VISTAS (Visibility Improvement - State and Tribal Association of the Southeast) visibility modeling effort, which has been conducted to assist in development of the second round of regional haze State Implementation Plans (SIPs) for ten states in the southeastern United States.

The visibility modeling effort relied mainly upon the Comprehensive Air Quality Model with Extensions (CAMx). The VISTAS CAMx modeling effort was jointly conducted by Eastern Research Group and Alpine Geophysics. CAMx modeling was conducted for a 2011 baseline period and also for a future year emission projection representing 2028.

Technical documents reviewed were those posted to the VISTAS website¹ along with associated guidance provided by VISTAS to member states (also found at the VISTAS website). Consistent with the terminology developed by the VISTAS group, the second round of visibility modeling is described using the name “VISTAS II”.

Executive Summary

This section provides a brief overview of technical comments regarding the VISTAS II modeling studies. Additional detail on the topics identified in this section has been provided in the “Technical Discussion” sections later in this report.

1. The Model Performance Evaluation (MPE) conducted by VISTAS as part of the 2011 baseline CAMx modeling effort showed a large and significant underprediction for sulfate and organic carbon. In particular, the sulfate errors were outside of the modeling error boundaries established by VISTAS for its own CAMx modeling efforts². The sulfate errors were also larger during the summer, when the sulfate extinction is known to be the greatest contributor to visibility impairment. The large sulfate underprediction clearly means that the VISTAS II CAMx results should not be used without properly accounting for the known bias in the sulfate predictions. The known sulfate underprediction in the VISTAS II CAMx modeling results also has repercussions in other areas of the modeling analysis.

¹ <https://www.metro4-sesarm.org/content/vistas-regional-haze-program>

² VISTAS Model Performance Evaluation Report, Table 2-1 (Page 6)

2. VISTAS needs to reexamine whether the 2028 emission projection provides an accurate portrayal of the hourly/daily/seasonal Electric Generating Unit (EGU) emission profiles. The 2028 CAMx modeling inputs should be adjusted as necessary to capture the expected 2028 EGU utilization. The VISTAS II assumption that EGUs will operate in 2028 as they did in 2011 is simply not accurate.
3. In the VISTAS II modeling, the 20% most-impaired days were determined using the 2009-2013 IMPROVE measurements. This improper baseline was then erroneously carried forward to the 2028 modeling projection. As such, the VISTAS II 2028 modeling projection was not calculated using the 20% most-impaired days expected to be present in 2028, days that would be more impacted by nitrates based on changes in regional emissions since the baseline period. A better approach would have been to establish the 20% most-impaired days using more current IMPROVE measurements, e.g., 2014-2018 or later. Because the 20% most-impaired days were not accurately defined in the 2028 model projection, the VISTAS II modeling was biased in that it did not assess visibility impacts on days with elevated nitrate concentrations. In turn, the VISTAS II modeling failed to properly identify EGU and point sources with large NO_x emissions as contributing to visibility impairment and also failed to address potential visibility benefit of NO_x emission controls at these sources.
4. The Area of Influence (AOI) analysis was overly restrictive and failed to properly identify all sources contributing to adverse visibility conditions at VISTAS Class I areas. Most VISTAS states selected an AOI threshold in the range of 2-5% of the overall sulfate and/or nitrate impacts to identify emission sources contributing to visibility impairment. As a result, most states identified six or fewer contributing emission sources through the AOI analysis. Where a lower and more appropriate AOI threshold was selected, i.e., West Virginia, the number of emission sources captured by the AOI analysis was more reasonable.
5. The VISTAS II CAMx modeling also relied on a flawed PSAT modeling analysis that applied an outdated 2028 emissions inventory, provided incomplete information on source-specific contributions to visibility impairment, and carried forward known deficiencies in the modeled sulfate projections (see Item #1 above). VISTAS has coupled this flawed PSAT modeling analysis with a recommendation that only those sources which contribute 1% or greater to either the modeled sulfate or nitrate concentrations would be recommended for the “four-factor” emissions control analysis. As a result, VISTAS has concluded that only a relatively small group of emission sources would be considered for the “four-factor” analysis³.

One solution to this problem would have been to use an alternative method to screen emission sources for the “four-factor” analysis. For example, a simple emissions-to-distance (Q/D) ratio could have been applied or VISTAS could have placed a greater reliance on its initial “area of influence” (AOI) modeling (after addressing the AOI shortcomings discussed above). Relying on other modeling instead of the PSAT modeling would have generated a more realistic number of sources potentially subject to the “four-factor” analysis. The current approach that relied on the PSAT modeling (and also used an unacceptably high source contribution threshold) unduly limited the number of emissions sources subject to the “four-factor” analysis. The current

³ VISTAS Regional Haze Project Update, May 20, 2020

VISTAS modeling approach was fundamentally flawed and contrary to the intent of the EPA Regional Haze regulations.

6. Despite visibility improvements at Class I areas in the VISTAS states, current IMPROVE data continue to show that the remaining visibility impairment is largely dominated by sulfate and nitrate. As such, further sulfur dioxide (SO₂) and nitrogen oxides (NO_x) emissions reductions at EGUs and other point sources will be required to reach the national visibility goal. As per EPA's 2017 Regional Haze regulations, the state is required to look beyond the uniform rate of progress (URP) "glide path" in the current SIP planning period to judge success of the regional haze program. Compliance with the applicable EPA Regional Haze regulations stipulates that any emissions reduction measures meeting the "four-factor" emissions control criteria stated in the regulations should be implemented in the current SIP planning period, whether or not a given Class I area has met the URP visibility goals.

Technical Discussion

The Technical Discussion covers several individual items, as summarized below:

- CAMx Model Performance Evaluation
- Hourly/Daily/Seasonal Emissions Profile assumed in CAMx Modeling Input
- 20% Most-Impaired Days assumed for 2028 CAMx Modeling Projections
- Source Attribution and Selection of Sources for the Four-Factor Analysis
- CAMx Model Results vs. Visibility Glide Path

CAMx Model Performance Evaluation

All CAMx modeling studies are generally accompanied by a Model Performance Evaluation (MPE) under which statistics are developed that describe the accuracy of the model projections. In this instance, the VISTAS II MPE was developed using the CAMx 2011 base case modeling platform. The 2011 CAMx baseline scenario results were compared against IMPROVE (Interagency Monitoring of Protected Visual Environments) measurements from the same time period along with other available air quality monitoring data. In this report, the focus is on the CAMx MPE vs. IMPROVE measurements as the IMPROVE data are the primary measurement tool for assessing visibility trends.

The MPE compared the CAMx modeling results from the 2011 VISTAS platform against actual IMPROVE measurements. The statistical comparisons reported in the MPE used CAMx modeling projections paired in time and space with the IMPROVE measurements.

This discussion focusses on modeled sulfate impacts which are generally traceable to SO₂ emissions from point sources such as EGUs. Other emitting sources are also of interest because an important objective of the second-round regional haze SIPs is to identify sources which emit to visibility impairing pollutants affecting Class I areas and as such might be subject to a "four-factor" analysis which would review the feasibility of additional emissions controls.

Based on the VISTAS II MPE, the CAMx model results for the 20% most impaired days showed that the model results were biased low for two important visibility components: sulfate and organic carbon. The reported sulfate Normalized Mean Bias (NMB) for the VISTAS II CAMx MPE are listed below for the 20% most impaired days vs. measured IMPROVE data⁴.

- Sulfate NMB (All Seasons) -19.13%
- Sulfate NMB (Summer) -32.81%
- Sulfate NMB (VISTAS II Goal) +/- 10%
- Sulfate NMB (VISTAS II Criteria) +/- 30%

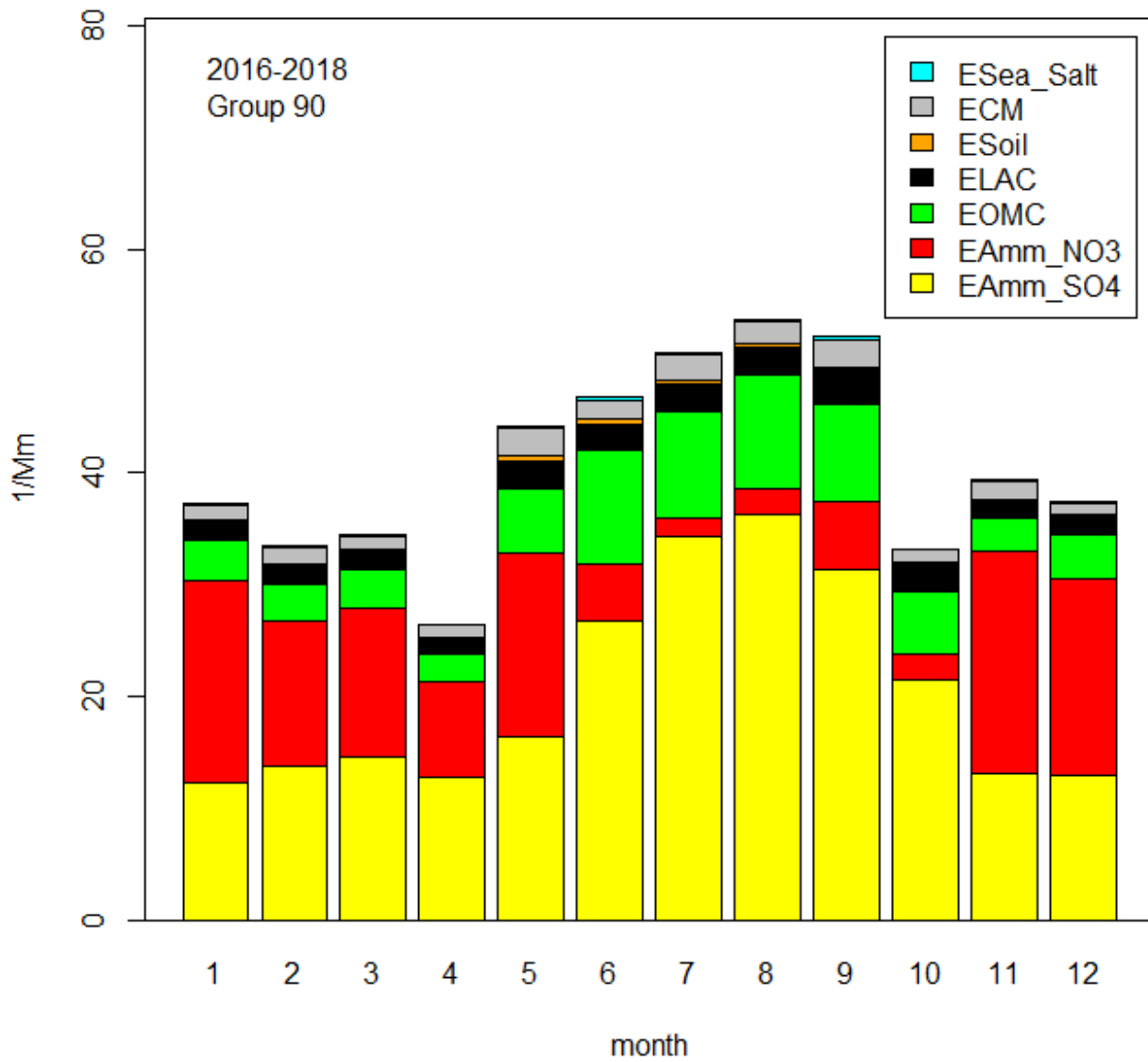
As reported above, the VISTAS II CAMx modeling using the 2011 emissions platform reported a significant underprediction for sulfate vs. the IMPROVE measurements on the 20% most impaired days for the same time period. The degree of the underprediction was also alarming as the sulfate error was outside of the CAMx model performance criterion selected by VISTAS (also listed above).

The negative sulfate bias occurred across all seasons but was larger during the summer months. This bias was also present across the entirety of the VISTAS modeling domain. For those Class I areas in the VISTAS domain, the occurrence of the 20% most impaired days was more frequent during the summertime and sulfate was also a major contributor to visibility impairment in the summer months. As an example, Figure 1 presents a monthly distribution for IMPROVE visibility data collected at Shenandoah National Park (SHEN) for the 20% most impaired visibility days (2016-18). Figure 1 shows that reconstructed extinction (a measure of impaired visibility) is largest at SHEN in the summer and that sulfate is the largest contributor to the measured summertime visibility impairment.

While no air quality model is perfect, the large and significant sulfate underprediction calls into question how one should best apply the VISTAS II CAMx model results. As Figure 1 demonstrates, the modeling errors are largest for the same period when the sulfate concentrations make the largest contribution to visibility impairment. The large sulfate underprediction means that the VISTAS II CAMx results should not be used directly without properly accounting for the known sulfate bias. The known sulfate underprediction in the VISTAS II CAMx modeling results also has repercussions in other areas. These issues are addressed in other sections of my report.

⁴ VISTAS Model Performance Evaluation Report, Table 2-1 and Table 3-1.

**Figure 1: IMPROVE Visibility Reconstructed Extinction by Month (2016-18)
 Shenandoah National Park VA (SHEN): 20% Most Impaired Days
 From Gebhart 2020**



Hourly/Daily/Seasonal Emissions Profile

For EGUs, the VISTAS II CAMX modeling includes an hourly/daily/seasonal emissions profile derived mainly from continuous emissions monitoring (CEMS) data which EGUs are required to collect under various regulations. This information was created using the Sparse Matrix Operator Kernel Emissions (SMOKE) processing system within CAMx. The hourly emissions data from 2011 CEMS measurements were used to create hourly profiles at EGUs for SO₂ and NO_x emissions. For other pollutants (which typically lack CEMS measurements), the hourly EGU emissions profiles were based on load data.

For non-EGU point sources, an hourly emissions profile was not created, and the annual emissions were assumed to occur at a uniform emission rate over the year.

In the VISTAS II CAMx modeling, the same hourly/daily/seasonal emissions profiles used in the 2011 modeling were also used for the 2028 emissions projections, e.g., at any given hour of the year being modeled, the 2028 emissions were at the same relative emissions in the 2011 data, adjusting for changes in the annual emissions total where necessary. Under the above approach, the implicit assumption was that the 2028 hourly/daily/seasonal EGU emissions profile would be unchanged from the 2011 data.

It is highly questionable whether the hourly/daily/seasonal EGU emissions profile for the 2028 projection would remain unchanged from the 2011 baseline, as assumed by the VISTAS II modeling. Since 2011, the electric utility industry has undergone dramatic shifts, influenced by numerous factors designed to increase reliance on alternative energy sources such as renewables and/or natural gas. For example, renewable energy mandates or goals have been established in VISTAS states such as North Carolina, South Carolina, and Virginia.⁵ Also, a major utility operating in the VISTAS region (Southern Company) has publicly announced a company-wide goal of reducing greenhouse gas (GHG) emissions by 50 percent before 2030.⁶

In response to the above and other initiatives, a number of electric utilities in the VISTAS region are in the process of moving away from coal-fired EGUs as their primary baseline generation assets. Moving forward, an increasing number of coal-fired units may be used to balance peak seasonal loads as opposed to meeting the normal baseline electric load on the grid. The 2028 VISTAS II modeling failed to account for the dramatic shift in how coal-fired EGU are expected to be utilized. By 2028, many EGUs are expected to have a dramatically different hourly/daily/seasonal emissions profile.

For example, if the EGU load were to shift such that the unit utilization increased during the winter, the SO₂ and NO_x emissions (as a percentage of total annual emissions) will be skewed toward the winter months. This change in utilization would not be reflected in the 2011 CEMS data. IMPROVE data at VISTAS Class I areas also show that nitrate extinction (as the resulting visibility degradation) is much greater during the winter period. Under such a scenario, the VISTAS II CAMx modeling could be underestimating the winter-time visibility impacts associated with EGUs.

⁵ Source: National Conference of State Legislatures website, www.ncsl.com

⁶ Source: Southern Companies website, www.southerncompany.com

VISTAS needs to reexamine whether the future EGU emission projections based on 2011 CEMS data provided for an accurate portrayal of the expected 2028 hourly/daily/seasonal emissions profiles. The 2028 CAMx modeling inputs should be adjusted as necessary to capture the expected 2028 EGU utilization. The assumption that EGUs will operate in 2028 as they did in 2011 is simply not accurate.

Selection of 20% Most-Impaired Days

The VISTAS II modeling used 2009-2013 as the baseline period. In addition, IMPROVE monitoring data from that same period were used to select the 20% most impaired days for analyzing future visibility impacts for the 2028 projection. This approach was flawed as the 20% most impaired days have shifted since the 2009-13 baseline period due to the imposition of emission controls and other actions that occurred as a result of the first-round of Regional Haze SIPs and other factors. Instead, as required under the federal Regional Haze regulations, the selection of the 20% most-impaired days for the 2028 projection should have been based on more current IMPROVE measurements. The current IMPROVE data (2014-18) are the most accurate projection available at this time for the future 2028 visibility conditions.

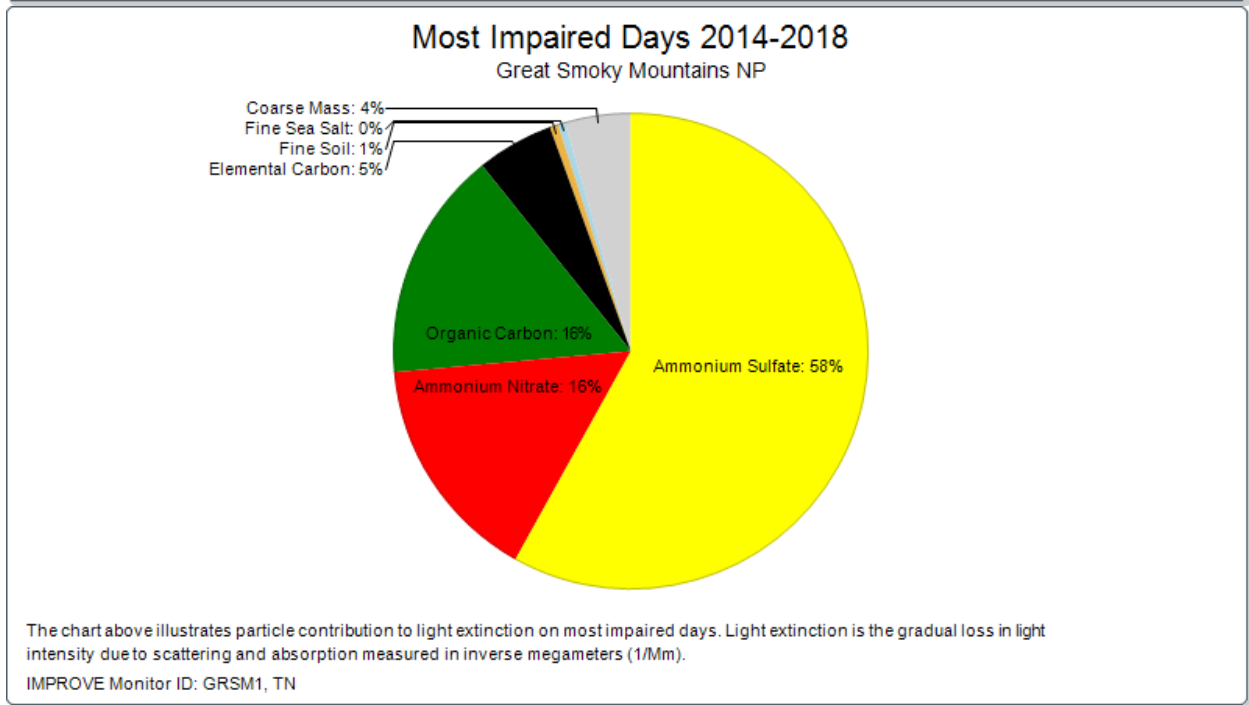
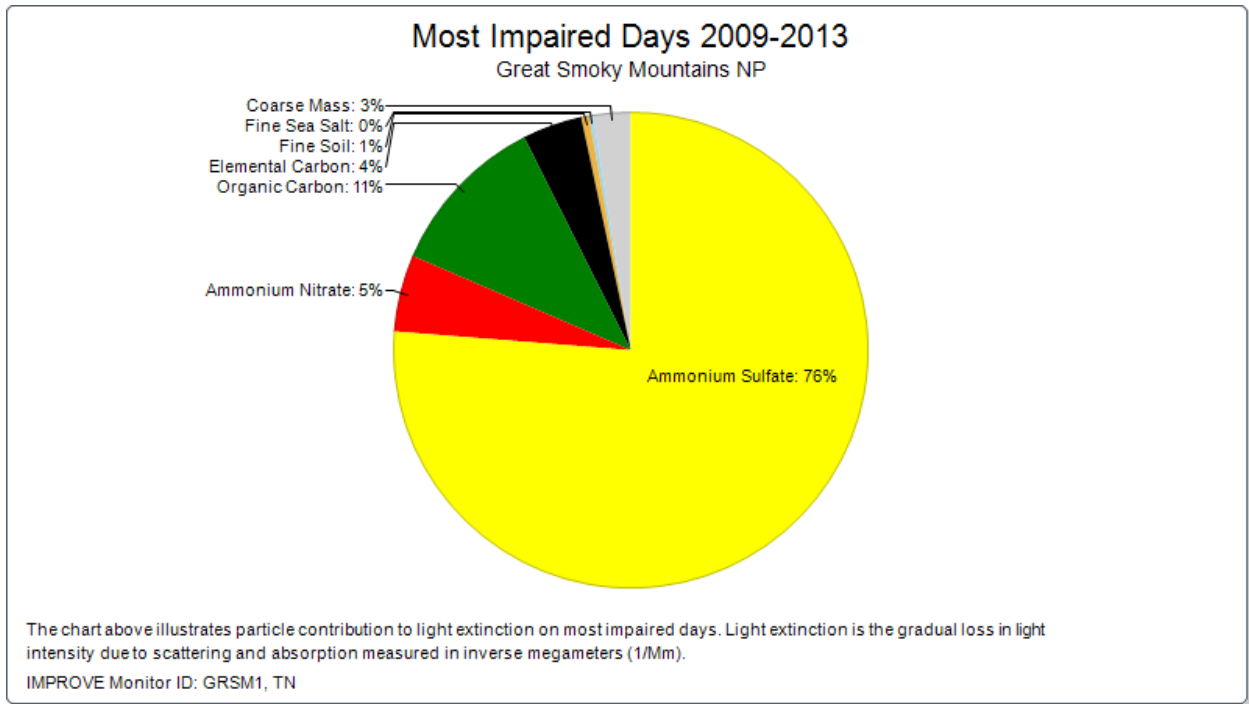
As an example which illustrates the changes described above, Figure 2 presents the reconstructed extinction for the 20% most-impaired days at Great Smoky Mountains National Park (GRSM). The data in Figure 2 compare the reconstructed extinction for the 20% most-impaired days covering the 2009-13 baseline period against the 2014-18 period. The 2014-18 time period would have been the most recent IMPROVE data available at the of the VISTAS II modeling effort.

The reconstructed extinction on the 20% most-impaired days in Figure 2 shows a dramatic trend toward less sulfate extinction and greater nitrate extinction. The decrease in sulfate likely represents the effect of SO₂ emission controls and other regulatory actions including those that were imposed in the first round of regional haze SIPs. In turn, nitrate has become an increasingly important contributor to current visibility impairment. For example, at GRSM, the nitrate extinction budget has roughly tripled since the 2009-13 baseline period, increasing from 5 percent to 16 percent. The temporal trends showing increased nitrate extinction for the 20% most-impaired days are also repeated at other Class I areas in the VISTAS domain.

Nitrate is also a seasonal pollutant with a tendency for significantly higher concentrations during the wintertime period (See Figure 1 above). Consistent with the observed increases in the nitrate extinction budget, occurrences of the 20% most-impaired days would have also shifted since the 2009-13 baseline period with more of these days also occurring during the winter months. Nitrate levels are typically higher during the winter due to the colder average temperatures.

In the VISTAS II visibility modeling, the 20% most-impaired days were determined using the 2009-2013 IMPROVE measurements and the same data were erroneously carried forward to the 2028 modeling projection. As such, the VISTAS II 2028 modeling projection was not calculated using the 20% most-impaired days that would be expected to be present in 2028. A better approach would have been to establish the 2028 20% most-impaired days using more current IMPROVE measurements, e.g., 2014-2018 as these data more accurately reflect the shift/increase in nitrate extinction levels.

Figure 2
Temporal Trends in Reconstructed Extinction
Great Smoky Mountains National Park⁷



⁷ Data source: [Improve – Interagency Monitoring of Protected Visual Environments \(colostate.edu\)](http://colostate.edu)

In summary, the 20% most-impaired days were not properly captured for the 2028 VISTAS II model projection. The 20% most impaired days selected by VISTAS for 2028 were in error as these days did not properly reflect the substantial increases in nitrate extinction contributions that were evident using more recent IMPROVE monitoring data. As a result, large NO_x emission sources contributing to adverse visibility impairment were not properly identified by VISTAS and the potential visibility benefits of emission controls at large NO_x emission sources were not properly analyzed.

Source Attribution

The VISTAS II modeling effort included information on source attribution to the visibility impairment. In this report, my focus is on the visibility source attribution analysis for individual point sources as it is the individual point sources (both EGUs and non-EGUs) which would be potentially subject to the so called “four-factor” emissions control analysis. The “four-factor” analysis evaluates whether additional controls to reduce visibility impairment might be required under the second-round regional haze SIPs in each state.

In the VISTAS II modeling, the source attribution analysis used a two-step process:

1. An “Area of Influence” (AOI) analysis was conducted to identify potential sources of visibility impairment impacting Class I areas within the VISTAS domain.
2. For individual point sources identified using the AOI approach, the emissions were “tagged” and the source contributions to visibility impairment were calculated within CAMx using the Particulate Matter Source Apportionment Technology (PSAT) option within CAMx.

The VISTAS source attribution analysis has two significant issues. First, the AOI analysis itself was overly restrictive in that the thresholds used to identify qualifying sources was too high, resulting in too few sources being identified. Second, the PSAT “tagging” approach introduced additional errors into the analysis. Also, the PSAT modeling itself was unnecessary given that AOI analysis already had the goal of identifying sources with the potential to contribute to adverse visibility conditions in VISTAS Class I areas.

The initial AOI evaluation utilized the HYSPLIT model. HYSPLIT allows calculation of “back-trajectories” that define the path taken by an air parcel before arriving at any given point. The various steps in the AOI analysis conducted by VISTAS II can be summarized as follows:

- The 20% most impaired days for a given Class I area/IMPROVE site were identified.
- HYSPLIT trajectories were calculated for each of the 20% most impaired days at all Class I areas in the VISTAS domain.
- Based on the HYSPLIT trajectories, the residence time in each grid cell was calculated. The residence time was also weighted by the extinction, creating the “extinction-weighted residence time” (EWRT).
- The EWRT was overlaid with emissions information from individual point source emissions, using the Q/D (emissions over distance) ratio between the point source of interest and the Class I area.

Table 1 below summarizes the findings from the AOI analysis as reported by VISTAS in a May 20, 2020 briefing to stakeholders. Table 1 shows the criteria adopted by each state in applying the AOI analysis as well as the number of qualifying sources based on these criteria.

Table 1
Summary of VISTAS AOI Analyses⁸

State	Threshold	Notes	# of Qualifying Sources
AL	2%	Sulfate only	9
FL	5%	Sulfate or nitrate + 4 additional sources	13 (AOI) + 4 = 17
GA	2% for GA facilities, 4% for non-GA facilities	Sulfate or nitrate,	5
KY	2%	Sulfate or nitrate	4
MS	2%	Sulfate or nitrate	2
NC	3%	Sulfate + nitrate	5
SC	2% for sulfate 5% for nitrate	+ 3 additional sources	3 (AOI) + 3 = 6
TN	3%	Sulfate + nitrate + 1 additional source	5 (AOI) + 1 = 6
VA	2%	Sulfate + nitrate	3
WV	0.2%	Sulfate or nitrate	13

Except for West Virginia, VISTAS states adopted AOI impact thresholds generally in the range of 2-5% to identify sources that are believed to contribute to existing visibility impairment in Class I areas. The lower threshold used by West Virginia (0.2%) resulted in the identification of the greatest number of emission sources (13). Otherwise, the AOI analysis for the most part generated only a handful of emission sources for further consideration as contributing to Class I visibility impairment. In seven of the ten VISTAS states, the unrealistically high AOI thresholds generated only six or fewer qualifying sources⁹.

⁸ Data Source: VISTAS Regional Haze Project Update, Powerpoint Presentation dated May 20, 2020

⁹ Florida had 13 sources identified through the AOI analysis despite having one of the higher thresholds. The VISTAS AOI report does not discuss this anomaly, but one possible explanation is that Class I areas are scattered across all areas of Florida (north, central, and south). As such the distance from a given source in Florida to the nearest Class I area may be less than the distance to the nearest Class I areas in other states.

Despite the problems in selecting a specific threshold, the use of a percentage impact to screen sources in the AOI analysis is itself flawed. By using a percentage, the calculated threshold in absolute terms was actually higher for Class I areas where the visibility impacts were more severe. This approach generated the opposite of what is necessary to achieve real-world improvements in visibility conditions. Where the current visibility impacts are known to be more severe, the need for emission reductions is greater and the criteria for selecting contributing emission sources should reflect that need. The current VISTAS AOI approach based on meeting a minimum percentage of the total impact failed in that regard.

Also, in some cases (e.g., NC, TN, and VA), states considered the combined impacts of sulfate and nitrate, while the other states evaluated sulfate and nitrate impacts separately. The approach used by NC, TN, and VA that considered the combined sulfate and nitrate impact would be preferred as real-world visibility impacts result from the combined effects of all visibility precursor pollutants.

The reader is encouraged to review the appropriate VISTAS technical report for additional details about the AOI analysis. As mentioned previously, the VISTAS II modeling addressed source attribution for more than just individual point sources such as emissions on a state-wide or industry-wide level. However, my comments address only the source attribution analysis for individual point sources.

Based on the documentation in the VISTAS technical reports, those point sources identified through the AOI analysis or otherwise selected by a particular state were subject to additional modeling using the CAMx PSAT source “tagging” procedure. The VISTAS II PSAT “tagging” was applied only to the 2028 emission projections and not the 2011 baseline emissions inventory. The PSAT “tagging” was also limited to sulfate and nitrate.

Although the VISTAS II documentation notes that the initial 2028 emission inventory projections were updated for the final CAMx modeling, the associated AOI and PSAT modeling did not use the final 2028 inventory. In the case of the PSAT modeling, model projections using the outdated inventory were adjusted based on source-specific changes in the SO₂ and NO_x emissions.

In the end, the VISTAS II PSAT modeling concluded that 33 emission sources remained with a modeled sulfate and/or nitrate contribution at or above 1% at any VISTAS Class I area¹⁰. As such, these 33 emissions sources were recommended for consideration by VISTAS states for the “four-factor” emissions control analysis; however, individual states had the option to further reduce the number of “four-factor” sources by establishing a required contribution threshold above 1%. Table 2 summarizes the state-by-state distribution of the 33 sources identified using the VISTAS II PSAT modeling.

¹⁰ VISTAS Regional Haze Project Update, Powerpoint Presentation dated May 20, 2020, Slide 122

Table 2

Summary of VISTAS PSAT Modeling Analyses

State	# of Qualifying Sources
AL	1
FL	10
GA	3
KY	2
MS	0
NC	3
SC	5
TN	2
VA	2
WV	5

In addition, the PSAT modeling returned 13 facilities located in non-VISTAS states that had modeled sulfate or nitrate impacts above the 1% threshold at Class I areas within VISTAS¹¹.

The 1% threshold criteria used by VISTAS for selecting emission sources for possible application of emission controls is by itself questionable. As noted above, by establishing the contribution threshold strictly on a percentage basis, the source-selection approach used by VISTAS for a more highly polluted Class I areas in essence would require that an individual point source have a larger absolute contribution to sulfate and/or nitrate concentrations before triggering the 1% threshold. Limiting the number of facilities subject to the “four-factor” emissions control analysis in this manner is contrary to the Regional Haze regulatory program objectives. Also, where the Class I area is more highly polluted, the future need for emissions controls will be greater. The source-selection procedure employed by VISTAS has resulted in fewer emission controls at sources impacting those Class I areas in the VISTAS domain which are more highly polluted.

¹¹ VISTAS Regional Haze Project Update, Powerpoint Presentation dated May 20, 2020, Slide 123

In addition, the 1% threshold selected by VISTAS was based on the modeled PSAT contribution to sulfate and nitrate concentrations individually. However, in the atmosphere, sulfate and nitrate act in combination to contribute to the reconstructed extinction and visibility impairment. The combined sulfate and nitrate impact on visibility from any individual point source was not calculated or evaluated by VISTAS. The VISTAS modeling should have instead considered all precursor emissions that contribute to visibility impairment and not just sulfate or nitrate. As a result, the overall contribution to visibility impairment from any individual point source was consistently underestimated in the VISTAS modeling approach.

Furthermore, the VISTAS II PSAT analysis itself contains significant uncertainties in describing the source attribution of individual sources to existing visibility impairment, as summarized below:

- The PSAT modeling was limited to “tagging” of sulfate and nitrate and did not address the source attribution from other visibility precursor pollutants. Any source-specific visibility attribution based solely on the sulfate or nitrate modeling projections would underestimate the overall visibility impact of an individual source. An accurate assessment of the source-specific visibility impact must be based on the source attribution considering all visibility impairing pollutants.
- As noted above, the PSAT projections applied in the VISTAS II modeling analysis were not calculated using the most recent 2028 emissions inventory update. Instead, PSAT data from an outdated 2028 emissions inventory were used. VISTAS II attempted to compensate for this shortcoming and adjusted the outdated PSAT projections by scaling the predicted sulfate and nitrate by the corresponding change in SO₂ and NO_x emissions. However, this approach carried an implicit assumption that the resulting sulfate and nitrate would be proportional to any change in emissions. It is known that sulfate and nitrate formation in the atmosphere has many complex elements which would be non-linear vs. emissions. As such, the PSAT modeling using an outdated 2028 emissions inventory introduced unknown errors into the modeling.
- As reported previously, the CAMx MPE revealed a significant underprediction for sulfate across the VISTAS modeling domain. Any errors described by the MPE for sulfate would also be carried over into the PSAT modeling results. The PSAT results for sulfate and the resulting source attribution were likely underestimated by the same ratios as described in the MPE.

Instead of relying on a flawed PSAT modeling analysis that applied an outdated 2028 emissions inventory, provided incomplete information on source-specific contributions to visibility impairment, and carried forward known deficiencies in the modeled sulfate projections, the VISTAS states should have instead relied on other approaches to screen emission sources for applicability of potential emission controls in the second-round Regional Haze SIPs. For example, a simple emissions-to-distance (Q/D) ratio has been used in other states to provide an initial screen for sources subject to the “four-factor” emissions control analysis. Using the AOI and PSAT modeling results to limit the field to only 33 emission sources for possible application of the “four-factor” analysis generated an approach that was overly restrictive.

As required under the 2017 Regional Haze regulations, the “four-factor” emissions control analysis should have been broadly applied to emission sources contributing to visibility impairment. Furthermore, the VISTAS II AOI and PSAT projections also underestimated the source-specific attribution to visibility impairment and as such should not have been relied upon in selecting the appropriate list of emission sources for the “four-factor” emissions control analysis.

Visibility Glide Path

Based on the VISTAS II modeling results, it was reported that the 2028 visibility projections for all VISTAS Class I areas except Everglades National Park (EVER) would be below the so-called “glide path”, which is also known as the Uniform Rate of Progress (URP). Also, after the visibility projections were adjusted for non-US emissions, the 2028 EVER visibility projection was also below the URP “glide path”. The URP “glide path” represents a linear reduction in visibility between the original baseline visibility conditions and the 2064 goal of “natural background” visibility.

The VISTAS II 2028 modeling projection showing that visibility conditions would be below the URP “glide path” are not disputed. In fact, modeling results showing that visibility improvements were below the URP “glide path” were not unexpected given that the regional haze program has resulted in significant emission reductions that were front-loaded to the early planning periods.

Nevertheless, whether the 2028 visibility projections were above or below the URP glide path should not have influenced the adoption of second-round regional haze SIP strategies that applied additional emission controls on visibility precursor pollutants. Although visibility improvements have occurred with “on-the-books” emission controls, current IMPROVE measurements also continue to show that the remaining visibility impairment on the 20% most impaired days is largely dominated by sulfate and nitrate extinction (See Figure 1 above showing the 2016-18 reconstructed extinction budget at SHEN). Sulfate and nitrate extinction is an indicator that SO₂ and NO_x emissions from EGUs and other point sources still contribute to present-day visibility impairment. So, sulfate and nitrate are expected to remain a substantial contributor to post-2028 visibility impairment on the 20% most impaired days and further improvements in visibility would require additional SO₂ and NO_x emission controls at EGUs and other point sources that go beyond current “on-the-books” controls. Consistent with current EPA policy, such emission controls would presumably yield visibility conditions that are even further below the URP “glide path” and would place the VISTAS Class I areas even closer to the national visibility goal.

The United States Environmental Protection Agency (EPA) concurs with the above position that the URP glide path does not present a “safe harbor” from the need to address EGUs and other point sources through the required four-factor emissions control analysis. In the Preamble to the USEPA 2017 Regional Haze Rule¹², EPA includes the following instructions:

“The EPA is clarifying the relationship between long-term strategies and RPGs in state plans and the long-term strategy obligations of all states. We are reiterating that the CAA requires states to consider the four statutory factors (costs of compliance, time necessary for compliance, energy and non-air quality environmental impacts and remaining useful life) in each implementation period to determine the rate of progress towards natural visibility conditions that is reasonable for each Class I area. The rate of progress in some Class I areas may be meeting or exceeding the uniform rate of progress (URP) that would lead to natural visibility conditions by 2064, but this does not excuse states from conducting the required analysis and determining whether additional progress would be reasonable based on the four factors.”

SO₂ and NO_x emissions reductions at EGUs and other point sources in the VISTAS domain will be necessary to reach the national visibility goal of no anthropogenic visibility impairment. There is no environmental benefit in waiting until future SIP planning periods to implement additional emission controls at EGUs and other point sources, especially where the “four-factor” analysis concludes that such controls would already be reasonable and cost-effective.

Most importantly, the current EPA Regional Haze regulations require imposition of emissions controls where such controls may be deemed appropriate using the “four-factor” criteria set forth in the applicable regulations. The EPA Regional Haze regulations also require that current SIP planning period look beyond the URP “glide path” as the sole indicator of success. The SIP planning process and associated VISTAS II CAMx modeling should not be an attempt to limit the number of EGUs and other point sources subject to the required “four-factor” emissions control analysis.

References

Gebhart, K.A., 2020. Shenandoah Residence Time Analyses. Internal National Park Service PowerPoint Presentation, updated September 22, 2020.

¹² Federal Register, January 10, 2017



**North Carolina
Conservation
Network**

234 Fayetteville Street
5th Floor
Raleigh, NC 27601
919.857.4699

October 14, 2021

Randy Strait
NC Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Re: NC RH SIP

Dear Mr. Strait,

Please see the attached petition signed by 1,406 North Carolina residents urging the Division of Air Quality to improve its RHSIP by adding consideration of all haze-causing pollution and expanding its list of sources to include all of Duke Energy's coal-fired power plants. These sources constitute North Carolina's largest visibility-harming air polluters, which the state is obligated to review and consider in this plan.

Specifically, the plan should include nitrogen oxides (NO_x) and particulate matter (PM) pollution reduction options, instead of focusing only on sulfur dioxide (SO₂). These pollutants seriously harm visibility and public health.

Thank you for your time.

A handwritten signature in black ink that reads "Brittany Iery".

Brittany Iery, Online Organizer
NC Conservation Network

Dear Division of Air Quality,

We, the undersigned, are concerned that the Regional Haze State Implementation Plan (RHSIP) does not do enough to protect clean air, our communities, and national parks. We urge the Division of Air Quality to improve its RHSIP by adding consideration of all haze-causing pollution and expanding its list of sources to include all of Duke Energy's coal-fired power plants. These sources constitute North Carolina's largest visibility-harming air polluters, which the state is obligated to review and consider in this plan.

Specifically, the plan should include nitrogen oxides (NOx) and particulate matter (PM) pollution reduction options, instead of focusing only on sulfur dioxide (SO2). These pollutants seriously harm visibility and public health.

Please do the right thing and protect North Carolina's clean air.

Thank you.

Sincerely,

	First Name	Last Name	Address	City	State	Zip Code
1.	George	Spruill	134 Elizabeth Ct	Murfreesboro	NC	27855
2.	Sharon	Beasley	199 Shelly Dr	Plymouth	NC	27962-9217
3.	Kevin-Andrew	Cronin	807 Saint Patrick St	Tarboro	NC	27886
4.	Peri	Satterthwaite	3002 Cherry Hill Church Rd	Tarboro	NC	27886
5.	Kristina	Davis	440 Spirit Mountain Trail	Waynesville	NC	28786
6.	Teresa	Lynch	563 Jeremiah Church Rd	Hollister	NC	27844
7.	Sue	Wage	903 Monroe St.	Roanoke Rapids	NC	27870
8.	Bernard	Kane	1706 Canterbury Rd	Greenville	NC	27858-4414
9.	John	Hinnant	503 Mount Vernon Dr Nw	Wilson	NC	27893
10.	Brenda	Lemus	1715 Evans Rd	Franklinton	NC	27525
11.	Cookie	Reynolds	3611 Crosswinds Dr	Stem	NC	27581-9244
12.	Holly	Potthoff	306 N Country Club Dr	Oxford	NC	27565-2820
13.	Joel	Myers	7001 Sorrel Park Dr	Morrisville	NC	27560
14.	Stephen	Welgos	1081 Woodland Church Rd	Wake Forest	NC	27587
15.	Christine	Drea	1709 Rosedale Ave	Durham	NC	27707-2111
16.	Ted	Frazer	6 Drakesway Ct	Durham	NC	27713
17.	John	Hollingsworth	109 W Piedmont Ave	Durham	NC	27707-1743
18.	Kenneth	Crews	3589 W Thollie Green Rd	Stem	NC	27581
19.	Keval	Khalsa	1215 Carroll St	Durham	NC	27707
20.	Lisa	Mcdowell	7 Guilford Pl	Durham	NC	27713-6277
21.	Mary Susan	Sewell	2904 Legion Ave	Durham	NC	27707-1924
22.	Casey	Therrien	614 Glen Hollow Dr	Durham	NC	27705-5675
23.	Mary Ann	Witt	2600 Croasdaile Farm Pkwy	Durham	NC	27705
24.	Evan	Smith	1134 Stacey Glen Ct	Durham	NC	27705-5680
25.	Aaron	Reuben	309 Edward St	Durham	NC	27701
26.	Elaine	Levine	Po Box 99	Newport	NC	28570
27.	Connie	Raper	9401 Theresa Ln	Rougemont	NC	27572
28.	Daniel	Singer	311 Greenwood Dr	Durham	NC	27704
29.	Jacqueline	Wachholz	114 Fairntosh Pl	Durham	NC	27712
30.	Keith	Levene	405 Carolina Cir	Durham	NC	27707
31.	Tracy	Feldman	5306 Pelham Rd	Durham	NC	27713
32.	Angela	Vieth	3009 Bexley Ave	Durham	NC	27707
33.	Becky	Wilkes	117 Winterberry Ridge Dr	Durham	NC	27713-9440
34.	Ellie	Mayer	2 Saint James Ct	Durham	NC	27713-9408

35.	John	Wiles	5205 Langford Ter	Durham	NC	27713
36.	Claudia	Kaplan	4911 Victoria Dr	Durham	NC	27713
37.	Vicki	Ryder	15 Glenmore Dr	Durham	NC	27707
38.	Patti	Rieser	1509 Blount St	Durham	NC	27707-1525
39.	Toby	Ives	53 Glenmore Dr	Durham	NC	27707-3922
40.	David	Buchwalter	3010 Harriman Rd	Durham	NC	27705
41.	Vicky	Brandt	3318 Coachmans Way	Durham	NC	27705
42.	Carol	Rist	1 Barratts Chapel Court	Durham	NC	27705
43.	Dorothy	Daniel	120 Turnstone Dr	Durham	NC	27703-8375
44.	Jayne	Boyer	4316 Thetford Rd	Durham	NC	27707
45.	Claire	Jentsch	3906 Springstop Lane	Durham	NC	27705
46.	Gary	Gartner	6 Scotland Pl	Durham	NC	27705
47.	Jayne	Boyer	4316 Thetford Rd	Durham	NC	27707
48.	Joy	Metelits	411 Cedar Club Cir	Chapel Hill	NC	27517-7213
49.	Karla	Brown	3208 Waterbury Dr	Durham	NC	27707
50.	Marian	Dessent	10 Macgregor Ct	Durham	NC	27705
51.	Norma	Gavin	1311 Pulitzer Ln	Durham	NC	27703-8393
52.	Dorothy	Osborn	2600 Croasdaile Farm Pkwy Apt A263	Durham	NC	27705-1436
53.	Kim	Piracci	101 Flamingo Rd	Durham	NC	27705
54.	Susan	Saenger	6 Scotland Pl	Durham	NC	27705
55.	John	Tetel	1719 N Roxboro St	Durham	NC	27701
56.	Jenny	Levine	820 Green St	Durham	NC	27701-1636
57.	John & Paula	Compton	Po Box 3443	Durham	NC	27702
58.	Laura	Ballance	1800 Glendale Ave	Durham	NC	27701
59.	Polly	Harris	118 W Trinity Ave	Durham	NC	27701
60.	Michael	Kosusko	924 Monmouth Ave	Durham	NC	27701
61.	Susan	Carson	4320 Kingfisher Ln	Durham	NC	27705-5769
62.	SL	Jones	323 E Chapel Hill St	Durham	NC	27702-0400
63.	Dave	Iery	608 Short Spoon Cir	Rocky Mount	NC	27804
64.	Gillian	Iery	608 Short Spoon Cir	Rocky Mount	NC	27804
65.	Reba	Fulghum	3329 Clandon Park Dr.	Raleigh	NC	27613
66.	Lisa	Lewis	112 Carrington Dr	Garner	NC	27529
67.	Duke	Van Luvender	1051 Fayetteville Ave	Calabash	NC	28467
68.	Lynne	C.	6032 Kentworth Dr	Holly Springs	NC	27540
69.	Jose	Mirabal	911 Allen Rd	Clayton	NC	28520

70.	Jessica	Cossette	6465 Frank Price Church Road	Fremont	NC	27830
71.	Carolyn	Turner	7307 Huddlestone Rd	Bailey	NC	27807-7821
72.	Deborah	Brown	411 Andrews St	Clayton	NC	27520
73.	Chris	Dowdle	240 E Walker Woods Ln	Clayton	NC	27527-9705
74.	James	Knott	34 Sawyer Ct	Wendell	NC	27591
75.	Lesia	Mills	Po Box 1183	Clayton	NC	27528
76.	Monica	Otoya	8932 Langwood Drive 104	Raleigh	NC	27613
77.	Patrice	Hubert	114 Michael Way	Clayton	NC	27520-5507
78.	Lesia	Mills	Po Box 1183	Clayton	NC	27528
79.	Alicia	Mckissock	59 Olena Dr	Fuquay Varina	NC	27526
80.	Kimberly	Rodriguez	3957 Sherron Hill Lane	Fuquay Varina	NC	27526
81.	Robert	Brown	333 Chinaberry Ln	Angier	NC	27501-8470
82.	Jacqueline	Kosnik	1208 Amber Acres Ln	Knightdale	NC	27545
83.	John	Godfrey	709 Montville Ct	Wake Forest	NC	27587
84.	Karin	Petzold	3517 Mount Prospect Cir	Raleigh	NC	27614
85.	Martha	Perelli	1119 Farm Leaf Dr	Durham	NC	27703
86.	Elizabeth	Neerman	4909 Swisswood Dr.	Raleigh	NC	27613
87.	Carl	Sigel	11116 Bremerton Ct	Raleigh	NC	27613
88.	Emily	Larsen	7644 Matherly Dr	Wake Forest	NC	27587
89.	Grace	Egly	12401 Glenlivet Way	Raleigh	NC	27613-6861
90.	John	Franklin	11504 Hyde Pl	Raleigh	NC	27614
91.	Jackie	Franklin	11504 Hyde Pl	Raleigh	NC	27614
92.	Jere	Snyder	6805 Laurdane Rd	Raleigh	NC	27613-5938
93.	Lia	Mcneilly	8613 Lakewood Dr	Raleigh	NC	27613
94.	Lisa	Lambert	1136 Mauldin Cir	Wake Forest	NC	27587-4420
95.	Maura	Egan	1329 Woodmanor Dr	Raleigh	NC	27614-9055
96.	Michelle	Jacobs	1017 Caudle Woods Dr	Wake Forest	NC	27587
97.	Slee	Arnold	6008 Wild Orchid Trl	Raleigh	NC	27613
98.	Jason	Milne	9124 Stoney Run Dr	Raleigh	NC	27615
99.	Julia	Myers	10108 Whitestone Road	Raleigh	NC	27615
100.	Kathy	Jones	904 Kinsdale Dr	Raleigh	NC	27615-1117
101.	Lawrence	Fetter	7601 Audubon Dr	Raleigh	NC	27615-3402
102.	William	Bay	2221 Bouncy Day Ct	Raleigh	NC	27614
103.	Alex	East	207 Marvista Ct	Cary	NC	27518-9197
104.	Barbara	Harvey	102 Ayr Ct	Cary	NC	27511

105.	Barry	Rosett	2419 Tiltonshire Ln	Apex	NC	27539
106.	Jeffrey	Snow	3108 Hunters Bluff Dr	Raleigh	NC	27606
107.	Dale	Batchelor	5508 Swiftbrook Cir	Raleigh	NC	27606
108.	David	Biesack	3671 Echo Farms Blvd	Wilmington	NC	28412
109.	Don	Enichen	104 Lochwood East Dr	Cary	NC	27518
110.	Erika	Bort	2205 Newleaf Dr	Apex	NC	27539
111.	Farshid	Bondar	128 Castlewood Dr	Cary	NC	27511
112.	Joyce	Parsons	1401 Old Regent Dr	Fuquay Varina	NC	27526
113.	Tom	Winstead	7905 Tulip Cir	Raleigh	NC	27606
114.	Debbie	Kenyon	509 Gablefield Ln	Apex	NC	27502
115.	Kristina	Sullivan	6 Anderson Ridge Rd	Mebane	NC	27302
116.	Michelle	Jacobs	1017 Caudle Woods Dr	Wake Forest	NC	27587
117.	Michael	Papay	684 Country Walk	Franklin	NC	28734
118.	Miriam	Youngquist-Thurow	6209 Thurlow Ct	Holly Springs	NC	27540
119.	Stephen	Boletchek	1106 Elbury Dr	Apex	NC	27502-2250
120.	Sheilafirehair	Spencer-Stover	Po Box 99, 204N Franklin St	Bunn	NC	27508
121.	Alison	Draper	1032 Prairie Aster Ct	Wake Forest	NC	27587
122.	Frankie	Mcmahon	25 Eaglefeather Path	Youngsville	NC	27596
123.	Karen	Hinsdale	504 Myrna Lane	Wake Forest	NC	27587
124.	Julie	Nye	407 River Trace Dr	Rougemont	NC	27572
125.	Amy	Popp	6905 Pinnacle Ridge Rd	Raleigh	NC	27603
126.	Brenda	Penny	6437 Brack Penny Rd	Raleigh	NC	27603
127.	Erika	Stucker	5609 Treestand Ct	Garner	NC	27529
128.	Rachel	Wendel	920 Open Field Dr	Garner	NC	27529
129.	Melanie	Kaufman	5808 Turner Store Ln	Raleigh	NC	27603-9519
130.	Cindy	Feild	417 S Meadow Rd	Raleigh	NC	27603-8617
131.	Susan	Miller	1101 Fairway Dr	Clayton	NC	27520-8611
132.	Mary Elizabeth	Haubenreiser	118 S Academy St	Washington	NC	27889-5063
133.	Carolina	Coto Rojas	319 W Palmetto St	Kill Devil Hills	NC	27948-7868
134.	Barry	Anderson	111 W Oregon Ave	Kill Devil Hills	NC	27948
135.	Nancy	Gray	643 Forest Hill Dr	Boone	NC	28607
136.	Ginny	Nolan	3204 S Memorial Ave	Nags Head	NC	27959
137.	Mary Ann	Jones	104 Swan View Dr	Kill Devil Hills	NC	27948
138.	Rosemary	Rawlins	2507 S Bridge Ln	Nags Head	NC	27959-9695
139.	Scott	Bradley	Po Box 402	Ocracoke	NC	27960-0402

140.	Mary	Valand	102 Lakewood	Greenville	NC	27834
141.	Michele	Darden	12 Blue Pete Ct	Southern Shores	NC	27949
142.	Donald	Barker	23 13Th Ave	Southern Shores	NC	27949
143.	Barbara	Smith	175 Perrytown Rd.	New Bern	NC	28562
144.	Kathryn	Walters	801 Washington Post Rd	New Bern	NC	28562
145.	S	Dauman	1000 Pinetree Dr Unit 1104	New Bern	NC	28562-4422
146.	Tracy	Price	3503 Karen Street	New Bern	NC	28560
147.	Christopher	Randall	Po Box 335	Cove City	NC	28523
148.	April	Hardee	7528 Sound Dr	Emerald Isle	NC	28594
149.	William	Kenneke	402 Holly St	Emerald Isle	NC	28594-2819
150.	Robert	Austin	135 Williston Creek Road	Williston	NC	28579
151.	Cynthia	Weeks	Po Box 1393	Maysville	NC	28555
152.	Linda	Jacoby	116 Lousan Dr	Cape Carteret	NC	28584
153.	Mary	Forsyth	650 Cedar Point Blvd Apt B15	Cedar Point	NC	28584
154.	Patricia	Rister	323 Winding Woods Way	Beaufort	NC	28516
155.	Dr Greg & Teresa	Rice	105 S 28Th St	Morehead City	NC	28557
156.	Constance	Casey	332 Lakemere Drive	New Bern	NC	28562
157.	Pattie	Baucom	205 Harbour Vw	Swansboro	NC	28584-7514
158.	Debra	Pagliughi	142 Hilltop Dr	Swansboro	NC	28584-9187
159.	Jessica	Clark	904 Gattis Rd	Jacksonville	NC	28546-5821
160.	Russell	Fowler	520 Harvest Pl	Swansboro	NC	28584
161.	Kelly	Hunt	429 Crows Nest Ln	Sneads Ferry	NC	28460-8523
162.	Lawrence	East	329 Richlands Ave Apt 8	Jacksonville	NC	28540
163.	June	Richardson	Irish Lane	Winterville	NC	28590
164.	Martina	Christie	235 Buckingham Drive	Winterville	NC	28590
165.	Susan	Howell	513 Plymouth Drive	Greenville	NC	27858
166.	Loretta	Wells	4170 Herman Sipe Rd	Conover	NC	28613-8909
167.	D.	G.	4430 Emma Cannon Rd	Ayden	NC	28513-7539
168.	Elizabeth	Mitchell	328 W Morgan St Ste A	Raleigh	NC	27601-1370
169.	Elizabeth	Keyser	5609 Old Forge Cir	Raleigh	NC	27609
170.	Jessica	Robinson	1116 S State St	Raleigh	NC	27601-2056
171.	Linda	Davis	133 S Bloodworth St	Raleigh	NC	27601-1503
172.	Jenna	Waggoner	3611 Brideveil Ct	Raleigh	NC	27610-2697
173.	Joanne	Loktu	1127 Hardimont Rd	Raleigh	NC	27609
174.	Mary Anne	Howard	313 W Martin St Apt 204	Raleigh	NC	27601

175.	Deborah	Tucker	549 Flannel Way	Zebulon	NC	27597
176.	George Ann	Ricks	1001 Barmkin Pl	Knightdale	NC	27545
177.	Brandon	Whitesell	408 Culpepper Ln	Raleigh	NC	27610
178.	Brittany	Iery	1116 Holburn Pl	Raleigh	NC	27610-1016
179.	Chris	Conley	4800 Walden Ct Apt B	Raleigh	NC	276042703
180.	Celeste	Winterberger	3901 Rim Ct	Raleigh	NC	27616-0720
181.	Doris	Jackson	5405 Wheatcross Pl	Raleigh	NC	27610-2152
182.	Chico	Scott	Po Box 25982	Raleigh	NC	27611
183.	Frank	Jeffreys	2600 Albemarle Ave	Raleigh	NC	27610-1811
184.	Lily	Wilson	1410 E Lenoir St	Raleigh	NC	27610
185.	Sterling	Bowen	109 N King Charles Rd	Raleigh	NC	27610
186.	Karin	Hess	304 Milburnie Rd	Knightdale	NC	27545
187.	April	Wilson	1704 Sorrell Brook Way	Raleigh	NC	27609
188.	Joe	Bearden	1809 Lakepark Drive	Raleigh	NC	27612
189.	Karla	Heinen	408 Northclift Dr	Raleigh	NC	27609
190.	Ken	Bosch	4404 Quail Hollow Dr	Raleigh	NC	27609
191.	Derek	Caldwell	7328 Shellburne Dr	Raleigh	NC	27612-2476
192.	Vickie	Penninger	711 Kimbrough St	Raleigh	NC	27608
193.	Stephen	Ridgill	6504 Hammersmith Dr.	Raleigh	NC	27613
194.	Lena	Gallitano	2907 Hostetler St	Raleigh	NC	27609
195.	Barbara E.	Johnson	2823 Bedfordshire Court	Raleigh	NC	27604
196.	Laura	Parkinson	3000 Club Dr	Raleigh	NC	27613-1207
197.	Chris	Magri	4501 Pike Rd	Raleigh	NC	27613
198.	Dara	Finkelstein	2509 Harptree Ct	Raleigh	NC	27613
199.	Emily	Brown	1502 Springmoor Cir	Raleigh	NC	27615-5704
200.	Emmy	Moore	2110 St Mary'S Street	Raleigh	NC	27608
201.	Elizabeth	Kearse	2113 Oakcrest Ct	Raleigh	NC	27612
202.	Liz	Gallagher	8309 Clear Brook Dr	Raleigh	NC	27615-5110
203.	Cindy	Levey	8012 Clear Brook Dr	Raleigh	NC	27615
204.	John	Parker	7609 Gold Mine Ct	Raleigh	NC	27615-6007
205.	Jeff	Kulp	5417 Oldtowne Rd	Raleigh	NC	27612
206.	John	Smith	7291 Sandy Creek Dr	Raleigh	NC	27615
207.	Peter	Crow	1401 Kershaw Dr	Raleigh	NC	27609
208.	Robin	Hammond	416 Latimer Rd	Raleigh	NC	27609
209.	Sandy	Baran	1801 Pineview St	Raleigh	NC	27608

210.	Cheryl	Mcgraw	1004 Braxton Ct	Raleigh	NC	27606-1706
211.	Ali	Aljanabi	811 Yorkshire Dr	Clayton	NC	27520
212.	Colleen	Payne	131 Skipwyth Cir	Cary	NC	27513
213.	Donald	Sexauer	1283 Schaub Dr Apt E	Raleigh	NC	27606-1853
214.	Sharon	Paterson	2084 Weston Green Loop	Cary	NC	27513
215.	Andrzej	Rusztowicz	1115 Ralph Dr.	Cary	NC	27511
216.	Andreas	Batz	1007 Manchester Dr	Cary	NC	27511
217.	Cynthia	Gallion	745 Hanska Way	Raleigh	NC	27610-2272
218.	Dana	Gruin	1121-E Lupine Ct.	Raleigh	NC	27606
219.	Mary	Frazer	1716 Evergreen Ave	Raleigh	NC	27603
220.	Elizabeth	Fensin	1936 Betry Place	Raleigh	NC	27603
221.	Jessica	Heironimus	913 W Morgan St	Raleigh	NC	27603
222.	Margaret	Vaughn	818 Chatham Lane	Raleigh	NC	27610
223.	Rebecca	Burmester	2121 N Hills Dr Apt I	Raleigh	NC	27612
224.	Carol	Laing	704 Penn Rd	Raleigh	NC	27604
225.	Mary	Aldridge	515 Holden St	Raleigh	NC	27604
226.	Eileen	Juric	511 Adams Street	Raleigh	NC	27605
227.	Shelley	Frazier	1200 East Oak Dr	Durham	NC	27712-3213
228.	Helen	Gray	1020 W Peace St Apt U8	Raleigh	NC	27605
229.	John	Brock	921 S Bloodworth St	Raleigh	NC	27601
230.	Kathleen	Mcquaid	802 Brooklyn St.	Raleigh	NC	27605
231.	Elizabeth	Marin	1209 Little Lake Hill Dr	Raleigh	NC	27607-6858
232.	Dr. Lucille	Keenan	213 Woodburn Rd	Raleigh	NC	27605
233.	Mac	Hulslander	2830 Barmettler St	Raleigh	NC	27607-4100
234.	Gail	Obrien	2532 Ashley Ct	Raleigh	NC	27607-6955
235.	Elizabeth	Kane	302 E 2Nd St	Washington	NC	27889-5003
236.	Sally	Migliore	4613 Grenadine Ct	Raleigh	NC	27612
237.	Shannon	Wylam	3405 Victor Pl	Raleigh	NC	27604
238.	Andrea	Thompson	1525 1/2 Hanover St	Raleigh	NC	27608
239.	Timofei	Voronov	5301 Tannat Ct	Raleigh	NC	27612
240.	Jason	Cashwell	314 Fairfield Ln	Cary	NC	27511-5408
241.	Samuel	Brewer	1203 Kilmory Dr	Cary	NC	27511
242.	Susane	Boukamel	200 Fox View Pl	Cary	NC	27511
243.	Sara	King Tomberlin	6509 Jade Tree Lane	Raleigh	NC	27615
244.	Elane	Papaleo	7950 Mountain Falls Ct Apt 107	Raleigh	NC	27617-1878

245.	David	Gardener	110 Hidden Rock Ct	Cary	NC	27513
246.	Suresh	Subbarao	3324 Kudrow Ln	Morrisville	NC	27560-7708
247.	Donald & Judith	Fuchs	4609 Wee Burn Trl	Raleigh	NC	27612
248.	Kim	Lillig	4005 Balsam Dr	Raleigh	NC	27612
249.	Linda	Williams	623 Springfork Dr	Cary	NC	27513
250.	Shirley	Ware-Gully	103 Bellshill Ct	Cary	NC	27513
251.	Alan	Painter	4366 Alarka Rd	Bryson City	NC	28713
252.	Carl	Gipson	2114 Tryon Towne Cir	Cary	NC	27518-7139
253.	Karen	Ferguson	402 Greenwood Circle	Cary	NC	27511
254.	Susan	Edelstein	308 Heidinger Dr	Cary	NC	27511
255.	Pat	Vescio	312 Arvo Lane	Cary	NC	27513
256.	Rick	Savage	101 Bonner Ct	Cary	NC	27511
257.	Shannon	Foreman	5936 Terrington Ln	Raleigh	NC	27606-4562
258.	Janey	Mcmillen	806 Knollwood Dr	Apex	NC	27502-1526
259.	Charlotte M	Speltz	112 Altair Cir	Apex	NC	27502
260.	Toni	Chester	5606 Stone Point Ct	Granite Falls	NC	28630-8804
261.	Frank	Moore	52 Hill Creek Blvd	Chapel Hill	NC	27516-0380
262.	Jean	Fuccella	153 High Country Dr	Cary	NC	27513-3449
263.	Krissa	Johnson-Sotomayor	106 Spring Needle Ct	Cary	NC	27513
264.	Michael	Welke	3108 Bluff Oak Dr	Cary	NC	27519
265.	Kimberly	Hurt	2712 Quail Point Dr	Raleigh	NC	27603
266.	Susan	Cottle	209 Hutchins Dr	Garner	NC	27529-4532
267.	Curtiss	Devereux	21 Gloucester Ct	Durham	NC	27713
268.	Dale	Mckeel	3559 Hamstead Ct	Durham	NC	27707
269.	Cindie	Hale	209 Chancellors Ridge Dr	Durham	NC	27713-6005
270.	Carol	Young	5808 Williamsburg Way	Durham	NC	27713-2636
271.	Susan	Ricker	135 Montclair Cir	Durham	NC	27713
272.	E.L.	Flake	3500 Old Greensboro Rd	Chapel Hill	NC	27516-5898
273.	Diane	Hayes	6717 Thunder Mountain Rd	Efland	NC	27243-9772
274.	Albert	Hardy	5619 Community Dr	Durham	NC	27705-8123
275.	Amy	Dunn	3600 Pasture Rd	Hillsborough	NC	27278
276.	Anne	Tooley	4402 Bradford Ridge Rd.	Efland	NC	27243
277.	Robert	Jenks	212 Weldon Ridge Ct	Durham	NC	27705
278.	Bryna	Rapp	6819 Morrow Mill Road	Chapel Hill	NC	27516
279.	Burwell	Ware	126 Kingston Dr	Chapel Hill	NC	27514-1630

280.	Donald	Holloway	404 Landerwood Ln	Chapel Hill	NC	27517-2341
281.	Heather	Main	5612 Buckhorn Rd	Efland	NC	27243
282.	Hart	Palmer	4919 Silver Fox Ln	Efland	NC	27243
283.	Jami	Haigler	249 Blalock Dr	Prospect Hill	NC	27314
284.	Janine	Tokarczyk	109 N Oakland Dr	Mebane	NC	27302-3301
285.	Linda	Jaubert	2601 Old Nc 10	Hillsborough	NC	27278
286.	Kathleen	Caldwell	2319 White Cross Rd	Chapel Hill	NC	27516
287.	Larry	Bohs	5001 Murphy School Rd	Durham	NC	27705-8036
288.	Lisa	Price	2200 N Lakeshore Dr	Chapel Hill	NC	27514
289.	Linda	Brown	116 Woodbridge Ln	Chapel Hill	NC	27514
290.	N.	Marrone	102 Ironwood Pl	Chapel Hill	NC	27514
291.	Patty	Daniel	1904 Jo Mac Rd	Chapel Hill	NC	27516
292.	Philip	Johnson	2600 Croasdaile Farm Pkwy C106	Durham	NC	27705
293.	Rebecca	Margolese-Malin	5 Balsam Ct	Chapel Hill	NC	27514
294.	Suzy	Lawrence	8622 Ryan Rd	Chapel Hill	NC	27516
295.	Sylvia	Stanat	2516 Homestead Rd	Chapel Hill	NC	27516-9086
296.	Keyon	Hutson	2503 Borland Rd	Hillsborough	NC	27278-8365
297.	Amber	Tarter	1008 Maple Ridge Dr	Chapel Hill	NC	27516-4844
298.	Betsy	Malpass	908 Woodbine Dr	Chapel Hill	NC	27517-4423
299.	Brenda	Middour	312 Brandywine Rd	Chapel Hill	NC	27516
300.	Charles	Humble	910 Emory Dr	Chapel Hill	NC	27517-3412
301.	Chris	Moses	125 Sprunt St	Chapel Hill	NC	27517
302.	Danielle	Thomas	600 S Churton St Apt 36	Hillsborough	NC	27278-2617
303.	Davenne	Essif	101 Wrenn Pl	Chapel Hill	NC	27516-9700
304.	David	Flora	550 Carolina Meadows Villa	Chapel Hill	NC	27517
305.	Don	Wells	308 Mitchell St	Hillsborough	NC	27278
306.	Wendy	Costa	500 Umstead Dr Apt A202	Chapel Hill	NC	27516
307.	Eli	Celli	407 Legends Way	Chapel Hill	NC	27516
308.	Frank	Fulghieri	204 Copper Beech Ct	Chapel Hill	NC	27517-8115
309.	Marc	Pendergast	203 Glenview Pl	Chapel Hill	NC	27514-1950
310.	Adam	Versenyi	205 Oleander Rd	Carrboro	NC	27510-1939
311.	James	Tippens	309 N Hasell St	Hillsborough	NC	27278-2050
312.	James	Emery	106 Mary St	Carrboro	NC	27510
313.	Jessica	Shell	111 N Occoneechee St	Hillsborough	NC	27278
314.	Joan	Danaher	1001 E Franklin St	Chapel Hill	NC	27514-3224

315.	Kate D	Torrey	501 Dogwood Dr	Chapel Hill	NC	27516
316.	Lesley	North	222 Ridge Trl	Chapel Hill	NC	27516-1641
317.	Leslie	Stewart	414 Dark Forest Dr	Chapel Hill	NC	27516
318.	Melissa	Hudgens	104 Eastgreen Dr	Chapel Hill	NC	27516
319.	James	Corrigan	11010 Lake Grove Blvd Ste 100	Morrisville	NC	27560
320.	George	Phillips	1140 Carousel Ln	Hendersonville	NC	28792-5846
321.	Nicole	Klett	201 Woodleaf Dr	Chapel Hill	NC	27516
322.	Olympia	Stone	404 Hillsborough Street	Chapel Hill	NC	27514
323.	Pamela	Benbow	1929 Front St Unit B4	Durham	NC	27705-2520
324.	Philip	Carl	345 Carolina Meadows Villa	Chapel Hill	NC	27517
325.	Phaedra	Kelly	308 Lindsay St	Carrboro	NC	27510-1754
326.	Piper	Honigmann	1215A Hillsborough Rd	Chapel Hill	NC	27516-8712
327.	Sandra	Rodriguez	206 Cates Farm Rd	Chapel Hill	NC	27516
328.	Stephanie	Rogers	1008 Starfield Circle	Hillsborough	NC	27278
329.	William	Stone	112 Rock Spring Ct	Carrboro	NC	27510
330.	Michele	Clark	109 Shadowood Dr Apt V	Chapel Hill	NC	27514
331.	Sam	Hay	108 Wildwood Dr	Morganton	NC	28655
332.	Susan	Yarnell	5722 Hideaway Dr	Chapel Hill	NC	27516
333.	Ashley	Andrews	1109 Blenheim Drive	Raleigh	NC	27612-5511
334.	Catherine	Marie	3612 Morningside Dr	Raleigh	NC	27607-3027
335.	Elizabeth	O'Brien	200 Waters Dr Apt A312	Southern Pines	NC	28387
336.	Paul	Kim	4009 City Of Oaks Wynd	Raleigh	NC	27612-5310
337.	Diane	Anderson	142 Sherman Nixon Rd	State Road	NC	28676-9048
338.	Andra	Eich	3263 Grandview Club Rd	Pfafftown	NC	27040
339.	Randy	Jones	909 Meadowbrook Dr	King	NC	27021
340.	Tammy	Hill	2027 East Rd	Walnut Cove	NC	27052
341.	Donna	Thompson	14591 Elkin Hwy 268	Ronda	NC	28670
342.	Tina	Calloway	201 Dale Blevins Rd	Grassy Creek	NC	28631
343.	Rose	Shulman	346 Piney Grove Church Rd	Traphill	NC	28685
344.	Patricia	English	313 Deer Creek Ln	Wilkesboro	NC	28697
345.	Alicia	Tucker	1101 K St	North Wilkesboro	NC	28659
346.	Heather	Tedder	522 Ridge Ln	Wilkesboro	NC	28697-7106
347.	Don	Bergey	144 Greenvally Rd	Winston Salem	NC	27106-4811
348.	Carroll	Mccullough	1244 Arbor Rd Box B-307	Winston Salem	NC	27104-1141
349.	Cama	Merritt	1244 Arbor Rd Apt 224	Winston Salem	NC	27104-1136

350.	Adrienne	Pilon	218 Friendship Cir	Winston Salem	NC	27106-3905
351.	Mary	Blackburn	116 Foster St	Jonesville	NC	28642-2416
352.	Erin	Ehrhardt	3413 Us 21 Hwy	Hamptonville	NC	27020
353.	Ken	Boaz	2448 Shacktown Rd	Yadkinville	NC	27055-8116
354.	Peggy	Moore	5845 Marshallgate Dr	Winston Salem	NC	27105-8744
355.	Anne M	Jones	158 Buckingham Rd	Winston Salem	NC	27104
356.	Carol	Gearhart	5622 Balsom Rd	Pfafftown	NC	27040
357.	Jennifer	Lane	6690 Dale St	Germanton	NC	27019
358.	Linda	Mcdermon	244 Brittany Road	Rural Hall	NC	27045
359.	Cathy	Pickeral	Po Box 54	Tobaccoville	NC	27050-0054
360.	Ruby	Coughenour	2705 Saint Johns Pl	Winston Salem	NC	27106
361.	Bobbie	Calgaro	7285 Orchard Path Dr	Clemmons	NC	27012
362.	Hellen	Shore	414 S Main St	Kernersville	NC	27284
363.	Althea	Taylor Jones, Phd	1469 Country Meadows Ln	Kernersville	NC	27284-9563
364.	Kay	House	44 E Glenview St	Marion	NC	28752-4725
365.	Lauren	Beard	7001 Tramore Ln	Clemmons	NC	27012
366.	Sandra	Smith	2779 Birchwood Dr	Winston Salem	NC	27103-3407
367.	Paul	Williams	236 Logan Ct	King	NC	27021
368.	Khari	Cunningham	821 Korner Rock Rd	Kernersville	NC	27284-9826
369.	Benjamin	Miller	242 Ridge Forest Ct	Winston Salem	NC	27104-3552
370.	Grace	Hepler	1879 Harper Rd	Clemmons	NC	27012-8621
371.	Joanne	Heckel	115 Sir Patricks Ct	Clemmons	NC	27012
372.	Kimberly	Nelson	501 Commonwealth Dr	Winston Salem	NC	27104
373.	Todd	Yennior	1325 Forest Wood Dr	Lewisville	NC	27023
374.	Astrid	Beisner	429 Nottingham Drive	Chapel Hill	NC	27517
375.	Betsy	Smith	11 Blue Bottle Ln	Durham	NC	27705-7317
376.	Mike	Byrum	1836 Flatrock Street	Winston Salem	NC	27107
377.	Charles	Moore	126 Vintage Ave	Winston Salem	NC	27127
378.	Jeanette	Kelley	1004 William Dr	Winston Salem	NC	27107
379.	Jeff	Bohan	900 Teague Rd	Winston Salem	NC	27107-6933
380.	Mrs Norma	Wilkie	1981 Old Salisbury Rd	Winston Salem	NC	27127
381.	Tom	Adkisson	1398 Hannaford Rd	Winston-Salem	NC	27103
382.	Craig	Collins	1660 Quillmark Rd	Winston Salem	NC	27127
383.	Alice	Stack	5721 Fox Chase Dr	Winston Salem	NC	27105
384.	Anne	Garvey	3235 Midkiff Rd	Winston Salem	NC	27106

385.	Debora	Horning	3619 Marlowe Ave	Winston Salem	NC	27106
386.	Frances	Huetter	1106 Standish Ct	Winston Salem	NC	27106
387.	Kenneth	Hoglund	5037 Cobblestone Rd	Winston Salem	NC	27106
388.	Heather	Prior	3815 Shattalon Drive	Winston Salem	NC	27106
389.	Mitch	Easter	1001 N Main St	Kernersville	NC	27284
390.	Paige	Truelove	113 Pineview Dr	Kernersville	NC	27284-2913
391.	Luba	Havraniak	2270 Sunderland Rd Apt 17A	Winston Salem	NC	27103-6596
392.	Tom	Barton	156 Piccadilly Drive	Winston Salem	NC	27104
393.	Nadine	Duckworth	804 Deal Farm Ln	Taylorsville	NC	28681
394.	Diane	Arbour	3409 6Th Street Drive N.W.	Hickory	NC	28601
395.	Robert	Schlagal	18723 Nc Highway 88 W	Creston	NC	28615-9562
396.	Kara	Dodson	220 Rhymer Branch Rd	Deep Gap	NC	28618-9446
397.	Dale	Kirkley	180 Maple Ridge Dr	Boone	NC	28607
398.	Leila	Jackson	606 Northridge Dr	Boone	NC	28607-7139
399.	Randy	Johnson	365 Hemlock Rd	Banner Elk	NC	28604-8833
400.	Thomas	Johnson	2455 Holloway Mountain Rd	Blowing Rock	NC	28605
401.	Nickki	Hearn	1741 Blackberry Rd	Boone	NC	28607
402.	Wes	Weaver	342 Dogwood Knl	Boone	NC	28607-8134
403.	Clayton	Denman	547 Rustic Rd	West Jefferson	NC	28694-8226
404.	Kathryn	Mclain	136 Brooks Landing Dr	Winston Salem	NC	27106-4359
405.	Charles	Wilson	Edgebrook Drive	Winston-Salem	NC	27106
406.	Lisa	Gould	272 N Hawthorne Rd	Winston Salem	NC	27104
407.	Richard	Marter	3250 Midkiff Rd	Winston Salem	NC	27106-3030
408.	Jeri	Graham	1715 Nasturtium Way	Apex	NC	27539
409.	Tamara	Lewis	418 Arlington Cir	Sanford	NC	27330
410.	Jennifer	Galicia-Mcdaniel	2203 Longwood Ave	Sanford	NC	27330-6925
411.	Michael	Savino	345 Potluck Farm Rd	Rougemont	NC	27572
412.	Earlene	Gentry	10620 Nc Highway 700	Pelham	NC	27311
413.	Catherine	Deiningner	124 Goldberry Ln	Pittsboro	NC	27312-5493
414.	Jacalyn	Strouble	541 Meadow Branch Rd	Pittsboro	NC	27312-7057
415.	Dr. Daniel	Graham	123 Grace Ave.	Chapel Hill	NC	27517
416.	Gary	Simpson	82 Cynthia Ln	Pittsboro	NC	27312
417.	Laura	Heise	3396 Alston Chapel Rd	Pittsboro	NC	27312-9029
418.	Leif	Diamant	183 Box Turtle Rd	Pittsboro	NC	27312-5307
419.	Julia	Young	457 Meadow Branch Rd	Pittsboro	NC	27312-7056

420.	Max	Drake	1050 Beaver Dam Rd	Chapel Hill	NC	27517
421.	Martha W	Girolami	473 Mt. Pisgah Church Rd.	Apex	NC	27523
422.	Mimi	Gussow	74 Poplar Ln	Pittsboro	NC	27312
423.	Nancy	Donny	113 Mossbark Ln	Chapel Hill	NC	27514
424.	Nancy	Jacobs	138 Fearrington Post	Pittsboro	NC	27312-8552
425.	Johnny	Mayall	86A Willow Way	Chapel Hill	NC	27516
426.	Mary	Lindsey	3000 Galloway Rdg	Pittsboro	NC	27312
427.	Susan	Kelemen	90 Quartz Hill Rd	Pittsboro	NC	27312
428.	Richard	Strowd	41115 Moring	Chapel Hill	NC	27517
429.	Teresa	Ladd	601 Jamestown Rd	Pittsboro	NC	27312
430.	Wade	Barber	803 Greenwood Rd	Chapel Hill	NC	27514
431.	Mary	Linker	31 Reeves Rd	Pittsboro	NC	27312
432.	Melanie	Grant	117 Carden Pl Apt J	Mebane	NC	27302-9581
433.	Michelle	Wright	221 Fair Oaks Ct	Mebane	NC	27302-7984
434.	Harry	Phillips	8719 Morrow Mill Rd	Mebane	NC	27302-9232
435.	Shirlee	Miller	309 Somers Ave Apt A	Burlington	NC	27215
436.	Tracy	Huley	204 Pollock St	Beaufort	NC	28516
437.	Alexis	Lamere	3265 Northwest Trce	Elon	NC	27244
438.	Bud	Abbott	Po Box 24	Harkers Island	NC	28531
439.	Anne	Cassebaum	3469 Amick Road	Elon	NC	27244
440.	Linda	Zachary	8330 Zachary Hill Trl	Snow Camp	NC	27349-9724
441.	Louisa	Dang	1236 Jamestowne Dr	Elon	NC	27244
442.	Sandra	Dishman	1883 Prince Edward Dr	Elon	NC	27244
443.	Laurinda	Reinhart	8773 Holman Mill Rd	Snow Camp	NC	273499308
444.	Brigit	Carpenter	3533 Kidds Mill Rd	Franklinville	NC	27248-8388
445.	Corinne	Benbow	2736 Cedar Falls Rd	Franklinville	NC	27248
446.	John	Freeze	648 Chaney Rd	Asheboro	NC	27205
447.	Wanda	Buckmaster	3895 Randolph Church Rd	Liberty	NC	27298
448.	Anne	Jones	2304 Brandt Vlg	Greensboro	NC	27455-2168
449.	Julie Ann	Cooper	1314 Westridge Forest Ct	Greensboro	NC	27410
450.	Jory	Froggatt	5411 Ashbey Ln	Summerfield	NC	27358
451.	J. Wayne	Poole, Jr.	6913 Wooden Rail Ln	Summerfield	NC	27358
452.	Tim	Stevenson	2615 Oak Ridge Rd	Oak Ridge	NC	27310
453.	Charles	Landreth	102 N 9Th Ave	Mayodan	NC	27027-2216
454.	Katherine	Williams	2102 Bryant St	Madison	NC	27025

455.	Karin	Hall	708 Dalton St	Reidsville	NC	27320
456.	Suddha	Kuyt	Po Box 208	Mayodan	NC	27027-0208
457.	Vickie	Hall	221 Rockingham Stokes Dr	Madison	NC	27025
458.	Rebecca	Lawrence	810 Lawndale Dr Apt C304	Reidsville	NC	27320-6862
459.	Briony	Lewis	2019 Briar Run Dr	Greensboro	NC	27405-9705
460.	Richard	Partridge	503 Brushy Creek Dr	Mc Leansville	NC	27301
461.	Johnny	Hines	4985 Yanceyville Rd	Browns Summit	NC	27214-9209
462.	Gaylon	Green	3740 Lynn Oaks Drive	Trinity	NC	27370
463.	Kristiana	Van Eyk	632 Mountain Rd	Asheboro	NC	27205
464.	Tim	Mengel	6118 Branson Davis Rd	Randleman	NC	27317-7110
465.	William	Alston	1776 Bowers Store Rd	Siler City	NC	27344
466.	Elizabeth	Chappell	7217 Bobby Jean Rd	Julian	NC	27283
467.	Kayleigh	Feather	835 Teresa Way	Asheboro	NC	27205
468.	Leona	Whichard	344 Cedar Club Cir	Chapel Hill	NC	27517-7211
469.	Catherine	Byrd	600 E Forest Hill Dr	Goldsboro	NC	27534-1820
470.	Jeff	Wituk	204 Duffy Dr	Goldsboro	NC	27534-8839
471.	Kathryn	Jacoby	103 Powers Ct	Goldsboro	NC	27534
472.	Margaret	Sharp	112 Dobbs Pl	Goldsboro	NC	27534
473.	Marcia	Futrelle	2305 Old Mill Pl	Goldsboro	NC	27530
474.	Andy	Wood	Po Box 422	Hampstead	NC	28443
475.	Donna	Howard	113 White Heron Cove Rd	Hampstead	NC	28443-8485
476.	Lynne	Murphy	30 Cajun Ln	Brevard	NC	28712
477.	Barry	Auman	543 Sunset Lakes Blvd Sw	Sunset Beach	NC	28468
478.	Craig	Brown	670 Kings Trl	Sunset Beach	NC	28468-5316
479.	Edana	Donohue	332 Auburn Ln Nw	Calabash	NC	28467
480.	Dan	George	9140 Hickory Ln Se	Winnabow	NC	28479-5244
481.	Jack	Balsinger	1312 Taswell Ct	Leland	NC	28451-9493
482.	Julia	Martinelli	8918 Landing Dr Sw	Sunset Beach	NC	28468
483.	Bonnie	Westbrook	3795 Ridge Crest Drive	Southport	NC	28461
484.	E.	Ledford	636 Kingfisher Ln Sw	Sunset Beach	NC	28468-4906
485.	Patricia	Kelley	1228 N Sleepy Oak Ln	Leland	NC	28451
486.	Mallorie	Cole	108 S Palm Dr	Winnabow	NC	28479-5187
487.	Marcia	Kramarz	2111 Talmage Dr	Leland	NC	28451-9340
488.	Michael	Mconney	907 Wyndfall Dr Sw	Sunset Beach	NC	28468
489.	Martin	Hazeltine	7614 Dunbar Dr Sw	Sunset Beach	NC	28468

490.	Julia	Bishop	84 Cherry Rd Unit 2	Southport	NC	28461
491.	William	Yingst	1042 Putting Ln	Carolina Shores	NC	28467
492.	Nancy	Alexander	2572 Sugargrove Trl Ne	Leland	NC	28451-4505
493.	Donna	Walters	2449 Compass Pointe South Wynd Ne	Leland	NC	28451-6438
494.	Lee	Brown	1266 Cross Water Cir	Leland	NC	28451-1519
495.	Fredrick	Milano	Po Box 1518	Boone	NC	28607
496.	Janis	Simmons	1462 Longleaf Rd	Southport	NC	28461
497.	Elizabeth	Wood	1415 Barouche Ct	Wilmington	NC	28412
498.	Esther	Murphy	7235 Darden Rd Apt 127	Wilmington	NC	28411
499.	Lisa	Eckman	337 Gaskins Ln	Wilmington	NC	28411
500.	Joel	Finsel	2001 Perry Ave	Wilmington	NC	28403-1031
501.	James	Zizzo	2304 Wrightsville Ave.	Wilmington	NC	28403
502.	Kar	Lang	3613A Saint Johns Ct	Wilmington	NC	28403-4171
503.	Kathy	Lambui	712 Orange St	Wilmington	NC	28401-4641
504.	Karen	Langelier	3613A Saint Johns Ct	Wilmington	NC	28403-4171
505.	Margi	Erickson	412 S 3Rd St	Wilmington	NC	28401
506.	William	Taylor	2012 Creecy Ave	Wilmington	NC	28403-1010
507.	Stephen	Roberts	202 S 3Rd St	Wilmington	NC	28401
508.	Andy	Sefton	4937 Crosswinds Dr	Wilmington	NC	28409
509.	Beth	Hansen	3722 Amber Dr	Wilmington	NC	28409
510.	Elisa	Roels	8200 River Rd	Wilmington	NC	28412-3326
511.	Janis	Wootten	3805 Mayfield Ct	Wilmington	NC	28412-0971
512.	Karen	Burton	627 Saint Vincent Dr	Wilmington	NC	28412-3622
513.	Kimberly	West	1912 Washington St	Wilmington	NC	28401
514.	Linda	Webb	1000 Carolina Beach Ave N	Carolina Beach	NC	28428
515.	Matt	Miller	3519 Melissa Ct	Wilmington	NC	28409-2599
516.	Maryleigh	Preston-Mcclure	1527 Village Dr Apt 1	Wilmington	NC	28401
517.	Murray	Whitehill	318 Buccaneer Rd	Wilmington	NC	28409-2719
518.	M	Stanley	126 Central Blvd	Wilmington	NC	28401
519.	Steve	Currie	239 Water Oak Ct	Kure Beach	NC	28449
520.	Donna	Sloan	3500 Melissa Court	Wilmington	NC	28409
521.	Katherine	Hill	509 Whiting Cv	Wilmington	NC	28412-0942
522.	Amanda	Morgan	105 Mishoe Rd	Castle Hayne	NC	28429
523.	Anthony	Snider	350 Valhalla Rd	Southern Pines	NC	28387-6919
524.	Carol	Fordon	7313 Featherstone Ct	Wilmington	NC	28411-7113

525.	Bette	Bauereis	416 Black Diamond Dr	Wilmington	NC	28411-8376
526.	Isabella	Payonk	129 White Oak Dr	Wilmington	NC	28409
527.	Johnette	Fields	3206 Graylyn Terrace	Wilmington	NC	28422
528.	Peter	Schulz	2616 Hargate Ct	Wilmington	NC	28405
529.	Kayne	Darrell	5008 Castle Lakes Rd	Castle Hayne	NC	28429
530.	Kristen	Stritter	2121 Whiskey Branch Drive	Wilmington	NC	28409
531.	Tom	Riggins	710 Bayshore Dr	Wilmington	NC	28411
532.	Pauline	Endo	7414 Lucky Fish Ln	Wilmington	NC	28411
533.	Darlene	Ramey	5426 Sun Coast Dr	Wilmington	NC	28411-6514
534.	Tom	Schultz	414 Hiawasse Ave	Black Mountain	NC	28711-2829
535.	Sondra	Vitols	8208 Bald Eagle Ln	Wilmington	NC	28411
536.	Shannon	Harper	511 Old Mill Rd	Castle Hayne	NC	28429
537.	Tracey	Kruger	3401 Bragg Dr	Wilmington	NC	28409-6952
538.	Wanda	Duchesne	7436 Whitney Dr	Wilmington	NC	28411
539.	Mercedes De	Hyman	279 Leutze Hall, 601 S.College Road	Wilmington	NC	28403
540.	Len	Gregorio	1332 Cape Fear National Dr	Leland	NC	28451
541.	Virginia	Lundeen	405 Sabra Dr	Wilmington	NC	28405-3834
542.	Matthew	Burgess	1242 Burgess Road	Jefferson	NC	28640
543.	Monica	Rolquin	901 Nutt St Apt 126	Wilmington	NC	28401-3378
544.	Miles	Murphy	5052 Park Ave	Wilmington	NC	28403
545.	Peggy	Fry	115 Pine Cone Rd	Wilmington	NC	28409
546.	L W	Robinson	413 Ridge Rd	Wilmington	NC	28412-7367
547.	Theresa	Elias	218 N Duplin St	Wallace	NC	28466
548.	Carrie	Kluiter	273 Parrish Farm Ln	Benson	NC	27504
549.	Lisa	Maccaro	420 Hogan Cir	Clayton	NC	27527
550.	Deborah	Mcguinn	1304 White Memorial Church Rd	Willow Spring	NC	27592-8834
551.	Quincey	Church	100 Pine Needle Dr	Angier	NC	27501-9016
552.	Summer	Evans	566 Bryerstone Dr	Willow Spring	NC	27592-8788
553.	Rica	Xxxx	Xxxx	Whiteville	NC	28472
554.	Jen	Johnson	1720 Orange St	Wilmington	NC	28403
555.	Maureen	Costa	8101 Furtado Drive,	Wilmington	NC	28411
556.	Joan	Ryder	3305 Woolwitch Ct N	Castle Hayne	NC	28429
557.	Laura	Faber	6346 Pawling Ct	Fayetteville	NC	28304-5566
558.	Stephany	Hamilton	634 Pleasant Loop	Fayetteville	NC	28311-6936
559.	Bretton	Little	2711 Bennington Rd	Fayetteville	NC	28303

560.	C	Fisher	1619 Fort Bragg Rd	Fayetteville	NC	28305-4711
561.	David	Nikkel	2641 Lockwood Rd. Unit 102	Fayetteville	NC	28303
562.	Hannah	Rodriguez	4620 Nix Rd	Fayetteville	NC	28314
563.	James	Kerchmar	824 Azalea Dr	Fayetteville	NC	28301-4804
564.	Mark	Zalaznik	2861 Skye Dr	Fayetteville	NC	28303
565.	Walt	Dietrich	429 Summerlea Dr	Fayetteville	NC	28311-1171
566.	Henry Louis	Rodriguez Cruz Jr	7718 Eunice Dr	Fayetteville	NC	28306-8625
567.	Sharon	Pugh	703 Fleming St.	Wilson	NC	27893
568.	Joseph	Reardon	6640 Brookshire St	Fayetteville	NC	28314
569.	Brianna	Ellerbe	4124 Kittrell Farms Dr, Apt 2	Greenville	NC	27858
570.	Andrea	Poole	2174 Skyview Dr	Fayetteville	NC	28304
571.	Jacquelyn	Hough	305 Andrews Rd	Red Springs	NC	28377
572.	Andy	Rodriguez	108 Thornback Dr	Raeford	NC	28376-5455
573.	Michael	Evans	2164 B Sunchon Rd	Fort Bragg	NC	28310
574.	Cliff	Long	118 Linwood Dr	Albemarle	NC	28001-2923
575.	Cindy	Shoaf	225 Playground Ln	Salisbury	NC	28146
576.	Glenn	Ahrendt	140 Winged Foot Rd.	Pinehurst	NC	28374
577.	Christine	Ganis	749 Burlwood Dr	Southern Pines	NC	28387-6164
578.	H. Alan	Helsing	2500 E Indiana Ave	Southern Pines	NC	28387-7400
579.	Linda	Konold	315 Burning Tree Rd	Pinehurst	NC	28374-9332
580.	Kathryn	Wright	620 Lighthouse Cir	Aberdeen	NC	28315-3774
581.	Susan	Strine	16 Melfort Drive	Pinehurst	NC	28374
582.	Cathleen	Pritchard	4 Georgia Ct	Pinehurst	NC	28374-9647
583.	Patricia	Richardson	1642 Aiken Rd	Vass	NC	28394-8913
584.	Richard	Ashton	15 Westchester Circle	Pinehurst	NC	28374
585.	Janet	Kenworthy	201 Blue St	Aberdeen	NC	28315
586.	Joanne	Thornton	P.O. Box 2162	Southern Pines	NC	28388
587.	Kenneth	Johns	122 Club House Dr, 2, 2, 2	New London	NC	28127
588.	Kendrick	Miller	218 Park Gq Ave	Salisbury	NC	28146-2341
589.	Cynthia	Bernett	10636 Rippling Stream Dr Nw	Concord	NC	28027
590.	Glenda	Steel	103 Union Street North	Concord	NC	28025
591.	Jennifer	Sass	117 Willow Ln Nw	Concord	NC	28025-4949
592.	Joy	Cook	5084 Sunburst Ln	Charlotte	NC	28213-4245
593.	Mandy	Dheel	2716 Stonewood Vw	Kannapolis	NC	28081-7744
594.	Rita	Dixon	9830 Darby Creek Ave Nw	Concord	NC	28027-8212

595.	Taylor	Conner	8836 Thatcher Place	Harrisburg	NC	28075-6504
596.	Dianne	Miller	910 Woodbrook Pl Ne	Concord	NC	28025
597.	Melissa	Young	1263 Boswell Ct Nw	Concord	NC	28027
598.	Susan	Hannah	476 Caldwell Dr Se	Concord	NC	28025
599.	Courtney	Steinberg	216 Hahn Pl, Se	Concord	NC	28025
600.	Margaret	Cox	254 Retriever Ct Se	Concord	NC	28025
601.	Ryuu	Nishikawa	2900 Freedom Dr	Lumberton	NC	28358
602.	Teresa	Maroney	606 S Main St	Raeford	NC	28376
603.	Dagmar	Williams	1750 Wade Stedman Rd	Stedman	NC	28391
604.	Jessica	Starling	5152 Jaycee St	Stedman	NC	28391-9053
605.	Raymond	Harris	210 Tiffany Ct Apt D	Fayetteville	NC	28301
606.	Phillip	Davis	239 Bowers Ln	Ellerbe	NC	28338
607.	Preston	Waddell	Po Box 2046	Rockingham	NC	28380
608.	Jeff	Botz	404 S College St	Monroe	NC	28112-5494
609.	Medic247	O'Brien	600 N 35Th St	Morehead City	NC	28557
610.	Brenda	Stone	7016 Stirrup Ct	Matthews	NC	28104-7779
611.	Jennifer	Barbara	609 Appomatox Dr	Marvin	NC	28173
612.	Cary	James	4348 Frying Pan Rd Se, , False	Southport	NC	28461
613.	Ram	Manchi	1044 Lake Forest Dr	Matthews	NC	28104-7411
614.	Frank	Stroup	329 Raintree Dr	Matthews	NC	28104
615.	Mark	Sullivan	4016 Logan Cir	Indian Trail	NC	28079
616.	Betty	Gunz	1409 Maryland Ave	Charlotte	NC	28209
617.	Holly	Haston	9526 Stoney Hill Ln	Charlotte	NC	28277-0025
618.	Jean	Hopkins	7324 Ricewell Rd	Charlotte	NC	28226
619.	Lillian	Harris Swindell	2118 Coniston Pl	Charlotte	NC	28207-1804
620.	Mary	Bowman	1612 Myers Park Dr	Charlotte	NC	28207-2670
621.	Michelle	Carr	1530 Queens Rd	Charlotte	NC	28207
622.	Rita	Mullis	7908 Byrchmont Pl	Charlotte	NC	28210
623.	Ruby	Edmondson	2809 Greenbriar Road	Charlotte, Nc	NC	28209
624.	Francis	Sanady	6538 Rosemary Ln	Charlotte	NC	28210
625.	Steve	Copulsky	6614 Lynn Ave	Charlotte	NC	28226
626.	Lucie	Laberge	6442 Donnegal Farm Rd	Charlotte	NC	28270
627.	Bill	Staton	2431 Hartmill Ct	Charlotte	NC	28226-6463
628.	Barbara	Lembo	3941 Arborway	Charlotte	NC	28211
629.	Mary Anne	Guy	4403 Simsbury Rd	Charlotte	NC	28226-5076

630.	Lee	Lumpkin	3530 Carmel Rd	Charlotte	NC	28226-7044
631.	Barbara	Gardner	12313 Parks Farm Ln	Charlotte	NC	28277
632.	Leigh	Yeoman	10501 Moss Mill Ln	Charlotte	NC	28277-1672
633.	Blaise	Dierks	1342 Woody Creek Rd	Matthews	NC	28105
634.	Carol	Marshall	1216 Lightwood Dr	Matthews	NC	28105
635.	Adele	Schiessle	6910 Hollow Oak Dr	Mint Hill	NC	28227-9585
636.	Edwin	Dennis	258 Carter Cir	Winston Salem	NC	27106
637.	Rita	Burns-Wooten	1150 35Th Street Pl Ne	Conover	NC	28613
638.	Chrisanne	Mitchell	379 7Th St Nw	Hickory	NC	28601-4828
639.	Derek	Chase	55 40Th Avenue Dr Ne	Hickory	NC	28601
640.	Lynn B.	Spees	280 28Th Avenue Pl Ne	Hickory	NC	28601
641.	David	Kyles	1215 24Th Ave Ne	Hickory	NC	28601
642.	Paul	Magnuson	4945 Brookridge Dr Ne	Hickory	NC	28601
643.	Vicki	Shull	510 5Th Ave Ne	Conover	NC	28613
644.	Wilfred	Robin	549 11Th Avenue Cir Nw	Hickory	NC	28601
645.	Paula	Bell	4581 W Nc 10 Hwy	Newton	NC	28658
646.	Richard	Mccrary	1759 Yellowstone Ct Apt I	Gastonia	NC	28054
647.	George	Burazer	8300 Meadow Lakes Dr # 473994	Charlotte	NC	28210
648.	Cindy	Henderson	824 Adams Dr	Gastonia	NC	28052
649.	Jim	Mitchem	154 Old Spring Rd	Belmont	NC	28012
650.	Karen	Gerdetz Valentine	2508 Ashley Ct	Belmont	NC	28012
651.	Laura	Liska	6018 Thorburn Way	Belmont	NC	28012
652.	Steven	Tracy	1118 Heatherloch Drive	Gastonia	NC	28054
653.	Liz	Mccarty	4586 Shawnee Ct	Maiden	NC	28650-9632
654.	Granville	Angell	7894 Falling Brook Lane	Vale	NC	28168
655.	Ken	Napier	157 Old Lowesville Rd	Stanley	NC	28164
656.	Sarah	Meadows	220 Old Beatty Rd	Stanley	NC	28164-9606
657.	Linda	Brown	800 Forest Hill Dr	Shelby	NC	28150-5529
658.	David	Marshall	930 W Warren St	Shelby	NC	28150
659.	Mike	Stimpson	7104 Weavers Run	Cramerton	NC	28032
660.	David	Campbell	1007 Brookhaven Dr	Shelby	NC	28152-8617
661.	Carrie	Rutherford	179 Poplar St	Forest City	NC	28043-4226
662.	Jeannie	Danford	405 Cross Creek Dr	Rutherfordton	NC	28139
663.	Bonnie	Sinatro	300 Three Bridge Rd	Columbus	NC	28722
664.	Shelly	Whiteside	218 Markham Rd	Tryon	NC	28782

665.	Sierra	Fowler	164 George Parker Dr	Rutherfordton	NC	28139
666.	C. Warren	Pope	12 Mountain Site Ln Ext	Asheville	NC	28803
667.	Howard	Yarborough	14 Beaver Valley Road	Asheville	NC	28804
668.	J.A.	Perry	24 Ridge Ave	Asheville	NC	28803
669.	Amanda	Levesque	1 Battle Sq Apt 309	Asheville	NC	28801-2740
670.	Betty	Lawrence	142 Hillside St	Asheville	NC	28801
671.	Camilla	Christiansen	434 Riverview Dr	Asheville	NC	28806-4317
672.	Channing	Mccann	112 Oakland Rd	Asheville	NC	28801-4810
673.	Claudia	Nix	72 Sherwood Rd	Asheville	NC	28803
674.	Deborah	Compton	7 Montview Dr	Asheville	NC	28801-1113
675.	Gloria	Shen	40 Rocking Porch Ln	Asheville	NC	28805-4304
676.	Jane	Laping	14 Concord Pl	Asheville	NC	28803-1010
677.	Janice	Stevenson	21 Von Ruck Ter	Asheville	NC	28801
678.	Janice	Stevenson	21 Von Ruck Ter	Asheville	NC	28801
679.	Justin	Landry	119 Chestnut Pl	Arden	NC	28704
680.	Randy	Whittington	83 Linden Ave	Asheville	NC	28801-1353
681.	Kathy	Inukai	95 Cowan Cove Rd	Asheville	NC	28806
682.	Bruce	Williams	52 Haywood Rd	Asheville	NC	28806-4522
683.	Edith	Simpson	15 Springdale Rd	Asheville	NC	28805
684.	Marcia	Greenstein	15 Oregon Ave	Asheville	NC	28806-3480
685.	Margaret	Small	163 Governors View Rd	Asheville	NC	28805
686.	Marilyn	Bollinger	28 Forestdale Dr	Asheville	NC	28803
687.	Marla	West	81 Wild Cherry Rd	Asheville	NC	28804
688.	Misty	Mathes	191 Balsam Dr	Waynesville	NC	28786
689.	Mary	Weber	131 Evelyn Pl	Asheville	NC	28801-1338
690.	Nancy	Bass	15 Sassy Ln	Asheville	NC	28805-8786
691.	Renee	Mazurek	34 Stockwood Ln	Asheville	NC	28803
692.	Richard	Peterson	15 Girdwood St	Asheville	NC	28801-3106
693.	Jennifer	Rish	120 Flint St	Asheville	NC	28801-2216
694.	Teal	Chimblo Fyrberg	99 Riddle Branch Rd	Burnsville	NC	28714
695.	Terry	Faulkner	160 Chatham Rd	Asheville	NC	28804
696.	Mr. Michael	Morgan	501 Dennis St	Swannanoa	NC	28778-3211
697.	Alyssa	Melton	1 Rocket Dr	Asheville	NC	28803
698.	Barbara	Sloss	5 Wagon Rd	Asheville	NC	28805-2613
699.	Julia	Burr	71 Fortune St	Black Mountain	NC	28711

700.	Miriam	Sexton	18 Cedarwood Trl	Asheville	NC	28803
701.	Don	Read	23 Spring Cove Rd	Asheville	NC	28804-2716
702.	Deborah	Swanson	568 Garren Creek Rd	Fairview	NC	28730-7608
703.	Fiddle	Witch	28 Tt	Swannanoa	NC	28778
704.	Julie	Irwin	Po Box 1197	Pisgah Forest	NC	28768
705.	Richard	Moore	15 Sassy Lane, Asheville	Asheville	NC	28805
706.	Herschel	Flowers	80 Walker Cove Rd	Black Mountain	NC	28711
707.	John	Ventre	700 Shumont Rd	Black Mountain	NC	28711
708.	Mary	Tharp	906B Montreat Rd	Black Mountain	NC	28711-3228
709.	Mary	Lounsbury	18 Pear Hill Rd	Black Mountain	NC	28711-9109
710.	Martha	Johnson	4 Daniel Ln	Black Mountain	NC	28711-8712
711.	Larissa	Bowman	425 Flat Top Mountain Rd	Fairview	NC	28730
712.	Nancy	Orban	1 Battle Sq Apt 1005	Asheville	NC	28801-2751
713.	Peter	Lourekas	Po Box 18738	Asheville	NC	28814
714.	Ruth	Lovinsohn	58 Hutchins Rd	Black Mountain	NC	28711
715.	Robert	Swett	301 Montreat Rd	Black Mountain	NC	28711-3119
716.	Sarah	Colvin	2524 Riceville Rd	Asheville	NC	28805
717.	Z. Vijay	Director	27 Hunting Lodge Dr	Black Mountain	NC	28711
718.	Nancy	Laporta	48 Elijah Hall Rd	Black Mountain	NC	28711-8805
719.	Helen	Fisher	506 Jefferson Ct	Lenoir	NC	28645
720.	Barbara	Barcomb	311 Virginia St Sw	Lenoir	NC	28645
721.	Delores	Carver	90 Harrison Ter Apt 138A	Marion	NC	28752-1609
722.	Cody	Jones	262 Hicks Chapel Loop	Marion	NC	28752
723.	Madeline	Perkins	1644 Greasy Creek Rd	Bakersville	NC	28705
724.	Carey	Buxman	1695 Bruce Rd	Mars Hill	NC	28754
725.	Colin	Sugioka	314 White Oak Rd	Burnsville	NC	28714-8816
726.	Elizabeth	Lyle	680 Rock House Rd	Hot Springs	NC	28743-7162
727.	Charlie	Froelich	16 Heather Mist Dr	Weaverville	NC	28787-8000
728.	Mendy	Knott	120 Pine Ridge Rd	Burnsville	NC	28714-8754
729.	Rebecca	Morris	239 Ivy Hill Rd	Marshall	NC	28753
730.	Kenneth	Fisher	326 Ewart Wilson Road	Burnsville	NC	28714
731.	Linda	Raper	701 Peters Cove Rd	Marshall	NC	28753-5986
732.	Lynn	Gregory	206 Meadow St	Waynesville	NC	28786
733.	Pat	Momich	7839 Nc 208 Hwy.	Marshall	NC	28753
734.	Abby	Bishop	301 Hidden Valley Dr	Pisgah Forest	NC	28768

735.	Fred	Coppotelli	383 Seldon Emerson Rd.	Cedar Mountain	NC	28718
736.	D	Rosengrant	385 Purple Finch Rd	Brevard	NC	28712
737.	Heide	Coppotelli	383 Seldon Emerson Rd	Cedar Mountain	NC	28718-9017
738.	Helen	Voris	615 Laurel Lake Dr Apt A103	Columbus	NC	28722-7425
739.	Jennifer	Harper	192 Ole Looney Coon Rd	Brevard	NC	28712-5112
740.	Jaedra	Luke	1320 Slick Rock Rd	Brevard	NC	28712
741.	Jay	Slusher	34 Rhett Dr	Flat Rock	NC	28731
742.	Julie	Shoemaker	1569 Folly Rd	Hendersonville	NC	28739
743.	Joyce	Dye	10 Rivoli Blvd	Hendersonville	NC	28739
744.	Julie	Davis	165 E Rambling Crk	Tryon	NC	28782
745.	Brian	Blackwell	128 N Main St Unit A	Hendersonville	NC	28792-5065
746.	Jeremy	Stubbs	38 Grouse Ln	Brevard	NC	28712-9766
747.	Suzanne	Null	69 Grove Cir	Brevard	NC	28712
748.	Elizabeth	Felty	93 Boxwood Ln	Brevard	NC	28712
749.	Theresa	Lawlis	3109 Cove Loop Rd	Hendersonville	NC	28739-8870
750.	Linda	Camp	522 Woodfield Ln	Hendersonville	NC	28791
751.	Thomas	Sweeny	266 Quail Run	Pisgah Forest	NC	28768-9908
752.	Victoria	Reiser	387 Stoney Fork Rd	Barnardsville	NC	28709
753.	Adrienne	Ferriss	27 Pheasant Dr	Asheville	NC	28803
754.	James	Degrave	35 Yorktown Cir	Arden	NC	28704
755.	Frank	Parker	18 Mosers Pl	Candler	NC	28715-8941
756.	Jude	Pasqualini	354 Davis Creek Rd	Candler	NC	28715
757.	Lauren	Leathers	Po Box 1946	Skyland	NC	28776
758.	Corrinne	Gray	675 New Village Dr	Hendersonville	NC	28791
759.	Deborah	Dobson	32 N Clear Creek Rd	Hendersonville	NC	28792
760.	Justina	Prenatt	Po Box 102	Bat Cave	NC	28710
761.	Ian	Howe	1461 5Th Ave W	Hendersonville	NC	28739-4007
762.	Hayden	Fink	150 Brittany Place Drive, Apt. H	Hendersonville	NC	28792
763.	Chris	Mitchell	149 Cold Springs Rd	Hendersonville	NC	28792
764.	Linda	Zietlow	2 Pottery Terrace Trl	Flat Rock	NC	28731-8614
765.	Lois	Henrickson	47 Blue Heron Drive	Mills River	NC	28759
766.	Aklea	Althoff	420 Golf View Condo Ln Apt 3A	Hendersonville	NC	28739-5691
767.	Padma	Dyvine	Po Box 204	Bat Cave	NC	28710-0204
768.	Joseph	Robustelli	111 Breckenridge Ct.	Hendersonville	NC	28739
769.	Walter	Kross	32 Imperial Dr	Hendersonville	NC	28792-8105

770.	Kathleen	Basiewicz	Po Box 1204	Dana	NC	28724
771.	Alice	Martin-Adkins	41 Captains Dr	Candler	NC	28715-9211
772.	Sherman	Hoover	83 Appalachian Way	Asheville	NC	28806-1274
773.	Pat	Cole	6 Galahad Place	Asheville	NC	28806
774.	Laura	Wilson	22 Maywood Rd	Asheville	NC	28804-2533
775.	Joan	Roberts	68 5Th Ave	Asheville	NC	28806
776.	Katherine	Dreyer	3 Glenview Rd	Asheville	NC	28804
777.	Robin	Southecorvo	20 Friendly Holw	Asheville	NC	28806-1322
778.	Stella	Taylor	624 Welsh Partridge Cir	Biltmore Lake	NC	28715-8965
779.	Terri	Lefler	305 Martin St	Wilmington	NC	28401
780.	Krista	Stearns	165 Brevard Rd	Asheville	NC	28806
781.	Frances	Kelly	1965 Riverside Dr	Asheville	NC	28804
782.	Ulla	Reeves	221 Fairfax Ave	Asheville	NC	28806-3203
783.	Cathy	Nieman	312 Ivy Hill Rd	Weaverville	NC	28787
784.	Isis	Mary	18 Molasses Branch Rd	Weaverville	NC	28787-9032
785.	Marion	Danforth	9 Williams St	Weaverville	NC	28787
786.	Martha	Langer	41 Rabbit Ridge Dr	Weaverville	NC	28787-9295
787.	Sheri	Howe	2748 Woodlore Trl	Alexander	NC	28701
788.	Adam	Hensley	325 Morgan Rd	Candler	NC	28715
789.	Shifra	Nerenberg	5 Easy Street,	Leicester	NC	28748
790.	Debi	Treleaven	111 Mountain Dr	Biltmore Lake	NC	28715
791.	Donald	Harland	Po Box 2080	Candler	NC	28715
792.	Elaine	Scherer	160 Lake Dr	Biltmore Lake	NC	28715-8924
793.	Max	Mattison	234 Alta Vista Dr	Candler	NC	28715
794.	Beth	Stanberry	33 Coxe Ave Unit 468	Asheville	NC	288020140
795.	Robert	Allyn	59 Luther Cove Rd	Candler	NC	28715
796.	Susan	Wilson	100 Randall Cove Road	Leicester	NC	28748
797.	David	Mclintock	920 Tumbling Fork Rd	Waynesville	NC	28785
798.	Danna	Mclintock	920 Tumbling Fork Rd	Waynesville	NC	28785
799.	Evelyn	Coltman	90 Evergreen Circle	Waynesville	NC	28786
800.	Lynn	Jefferys	127 Longridge Ln	Waynesville	NC	28785-9399
801.	Chanda	Farley	117 Ford St	Canton	NC	28716
802.	Keri	Kelley	591 Reed Cove Rd	Waynesville	NC	28786
803.	Anthony	Scardaci	298 East St	Waynesville	NC	28786
804.	George	Rector	947 Bo Cove Rd	Cullowhee	NC	28723

805.	Connie	Nicholson	192 Thomas Park Dr	Waynesville	NC	28786-5793
806.	Dawn	Behling	326 Ridgeway St	Sylva	NC	28779-5496
807.	Joanne	Mcgrath	924 Chestnut Cove Rd	Sylva	NC	28779-7244
808.	Catherine	Carter	241 Oak Forest Drive	Cullowhee	NC	28723
809.	Joan	Parks	1102 Rockdale Rd	Whittier	NC	28789
810.	Leigh-Ann	Renz	278 Apple Creek Rd	Waynesville	NC	28786-9291
811.	Leigh-Ann	Renz	278 Apple Creek Rd	Waynesville	NC	28786
812.	Nancy	Argenziano	6376 Ela Rd	Whittier	NC	28789-7611
813.	Paul	Starnes	428 Lakeview Dr	Waynesville	NC	28785-8994
814.	Erika	Wood	117 Little Wolf Creek Rd	Murphy	NC	28906-7603
815.	Kim	Arauz	670 Hilltop Ln	Murphy	NC	28906
816.	Amy	Buckner	35 Shearer Rdg	Hayesville	NC	28904-7823
817.	Jerry	Starr	2851 Fulton Rd	Franklin	NC	28734-4935
818.	Blair	Justice	Po Box 8	Naples	NC	28760
819.	Emma	Goodnight	224 Drexel Heights St.	Morganton	NC	28655
820.	Ellyn And Neil	Kirschner	326 Tranquil Ave	Charlotte	NC	28209
821.	Elizabeth	Whitt	1116 Scaleybark Rd Apt 116B	Charlotte	NC	28209-4509
822.	Frank	Lorch	1522 Lynway Dr	Charlotte	NC	28203-6044
823.	Heather	Hensley	4525 Bradbury Dr	Charlotte	NC	28209
824.	Laura	Weaver	9249 Essen Lane	Charlotte	NC	28210
825.	Whitney	Byers	1122 Zion Ct	Charlotte	NC	28209-4121
826.	Susan	Towl	101 Long Pond Dr	Sneads Ferry	NC	28460-8308
827.	Christian	Ayers	2621 Hilliard Dr	Charlotte	NC	28205
828.	Karen	Hodges	2641 Palm Ave	Charlotte	NC	28205
829.	Mary	Tuma	4020 Larkspur Ln	Charlotte	NC	28205
830.	Nina	Fergusson	2254 Farmington Ln	Charlotte	NC	28205
831.	Charlie	Nitsch	3115 Stoneybrook Rd	Charlotte	NC	28205
832.	Eric	Innes	1421 Iris Dr Apt 4113	Charlotte	NC	28205-6161
833.	Janice	Valder	3800 Shamrock Dr	Charlotte	NC	28215
834.	Michael	Adams	201 Dinadan Dr Apt H	Charlotte	NC	28217
835.	Elaine	Worthey	8810 Palomino Ct	Charlotte	NC	28216-8742
836.	Fred	Martin	3215 Ravencliff Dr	Charlotte	NC	28226
837.	Laura	Covington	4419 Wildwood Ave	Charlotte	NC	28208-1354
838.	George	Brooks	310 Arlington Ave Unit 314	Charlotte	NC	28203-4293
839.	Sandy	Deoliveira	833 Farmhurst Drive	Charlotte	NC	28217

840.	Donnamarie	Woodson	8407 Larkmead Forest Dr	Charlotte	NC	28269
841.	Sally	Kneidel	424 Bertonley Ave	Charlotte	NC	28211-1502
842.	Eric	Krempa	1326 Cavendish Ct	Charlotte	NC	28211-3938
843.	Linda	Buckel	7732 Hammond Dr	Charlotte	NC	28215
844.	Brandon	Williams	7239 Lockmont Dr	Charlotte	NC	28212
845.	Janet	Palmer	5326 Silabert Ave	Charlotte	NC	28205
846.	Barbara	Mishoe	8310 Ramath Dr	Charlotte	NC	28211
847.	Melinda	Lewis	3208 Hubbard Road	Charlotte	NC	28269
848.	Mike	Rodden	7615 Neal Rd	Charlotte	NC	28262
849.	Tyson	Walkup	12716 Peyton Ct	Charlotte	NC	28262-1588
850.	Nadine	Blancato	12717 Windyedge Rd	Huntersville	NC	28078
851.	Janet	Fortner	10505 Kerns Road	Huntersville	NC	28078
852.	Jonathan	Brown	7218 Chaddsley Dr	Huntersville	NC	28078-2277
853.	Tarah	O'Neill	9403 Culcairn Rd	Huntersville	NC	28078-9332
854.	Catherine	Denham	111 Peters Pl	Davidson	NC	28036
855.	Chris	Micolucci	20811 Island Forest Dr	Cornelius	NC	28031
856.	Evan	Hoffman	13133 Poetry Ln.	Davidson	NC	28036-7778
857.	Catherine	Krug	7123 Windaliere Dr	Cornelius	NC	28031
858.	Gary	Andrew	319 N Downing St	Davidson	NC	28036
859.	Joseph	Starosciak	10705 Huntersville Cmns Dr	Huntersville	NC	28078
860.	Stephanie	Woelfle	8146 Townley Rd	Huntersville	NC	28078
861.	Timothy	Ward	13835 Asbury Chapel Rd	Huntersville	NC	28078-4651
862.	Helen	Mason	17025 Carlton Way Rd	Huntersville	NC	28078-8087
863.	Rose	Diaz	13415 Morgan Lee Ave	Charlotte	NC	28213-3871
864.	Deborah	Steiner	10102 Mountain Apple Dr	Mint Hill	NC	28227
865.	Jo Ann	Lee	12101 Barwen Ct	Charlotte	NC	28262
866.	Argelia	Zajia	1325 Ivy Meadow Dr	Charlotte	NC	28269
867.	Jan	Snead	3223 Draper Ave	Charlotte	NC	28205
868.	Kelly	Martinez	14800 Crooked Branch Ln	Charlotte	NC	28278
869.	Wendy	Stevens	7024 Hidden Creek Dr	Charlotte	NC	28214
870.	Walter	Betts	2312 N Elm St	Greensboro	NC	27408-5120
871.	Herbert	Baum	1827 Canaan Drive	Greensboro	NC	27408
872.	Michael	Sileno	1509 W Cornwallis Dr	Greensboro	NC	27408
873.	Teresa	Bratton	1110 Sunset Dr	Greensboro	NC	27408-7214
874.	Karen	Nehlsen	1804 Ashton Dr	Greensboro	NC	27410

875.	Cynthia	Dimattia	2805 Bardwell Rd	Greensboro	NC	27410
876.	Francie	Portnoy	509 Charles Conner Dr	Kernersville	NC	27284
877.	Caroline	Cook	1341 Seminole Dr	Greensboro	NC	27408
878.	Mitchell	Ward	1403 Whilden Pl Apt B	Greensboro	NC	27408
879.	Ann	Steighner	1218 Lakewood Dr	Greensboro	NC	27410
880.	Cathryne	Schmitz	204 Woodbourne Rd	Greensboro	NC	27410-5536
881.	David	Stubbs	3705 Brown Bark Dr	Greensboro	NC	27410-4605
882.	Kathron	Griffin	2506 Wright Ave	Greensboro	NC	27403
883.	Michael	Dunn	1304 Valleymede Rd	Greensboro	NC	27410
884.	Jo-Ann	Lommel	3903 W Friendly Ave	Greensboro	NC	27410-5643
885.	Portia	Mccracken	917 Forest Hill Dr	Greensboro	NC	27410-4709
886.	Carol	Simpson	3000 W Cornwallis Dr	Greensboro	NC	27408-6730
887.	Bill	Jordan	5001 Liberty Rd.	Greensboro	NC	27406
888.	Betsy	Hundley	410 Wyndwood Dr	Jamestown	NC	27282
889.	Carly	Ammon	811 Long Lake Dr	Fuquay Varina	NC	27526-3763
890.	Kelly	Irvin	211 Oakdale Rd	Jamestown	NC	27282
891.	Daniel	Morris	1712 Mirabeau Ct	High Point	NC	27265-1381
892.	Claudia	Lange	2512 E Woodlyn Way	Greensboro	NC	27407
893.	John	Porter	915 Woodbrook Dr	Greensboro	NC	27410
894.	Karl	Fields	902 Carolina St	Greensboro	NC	27401
895.	John	Davis	610 Bellemeade St	Greensboro	NC	27401
896.	Robin	Davis	313 S Chapman St	Greensboro	NC	27403
897.	Kay	Doost	1618 Marion St	Greensboro	NC	27403-3430
898.	Juan	Miranda	709 Milton St Apt 16	Greensboro	NC	27403-3499
899.	Ronald	Mcirvin	605 W Market St Unit 210	Greensboro	NC	27401-2244
900.	Sharon	Daugherty	4312 Bramlet Pl	Greensboro	NC	27407
901.	Velvet	Key	9910 Blairbeth St Apt 2020	Charlotte	NC	28277
902.	Micah	Moody	6121 Hedgecock Cir Apt 2D	High Point	NC	27265
903.	Jennifer	Brandon	174 Brody Ln	Lexington	NC	27295
904.	Susan	Barry	4281 Kennedy Rd	Thomasville	NC	27360-7306
905.	Judith	Williams	16 Vance Cir	Lexington	NC	27292
906.	Sandy	Petteway	465 Collingswood Dr	Winston Salem	NC	27127
907.	Barry	Smith	120 Hampton Cir	Salisbury	NC	28144-7950
908.	Betsy	Webster	14230 Nc Highway 801	Mount Ulla	NC	28125
909.	Cyndi	Wittum	101 East Foard St. Cleveland, Nc	Cleveland	NC	27013

910.	Ron	Barlow	14245 Cool Springs Rd	Cleveland	NC	27013-8138
911.	Dogan	Ozkan	318 Noble St # 3	Fairbanks	NC	27011
912.	Carol	Orr	508 Ridgehaven Cir	Winston Salem	NC	27104
913.	Sylvia	Messick	261 Kingsmill Dr	Advance	NC	27006-7284
914.	Tucker	Bailey	374 Abby Ln	Asheboro	NC	27205
915.	Judith	Little	165 W Meadowview Dr	Statesville	NC	28625-2448
916.	Michael	Baranski	12625 Cool Springs Rd	Cleveland	NC	27013
917.	James	Freeman	5156 Clifton Dr	Archdale	NC	27263-8239
918.	Burt	Melton	7035 Marching Duck Dr	Charlotte	NC	28210
919.	Jill	Goldfine	114 Chatworth Ln	Mooresville	NC	28117-8135
920.	Christi	Dillon	175 Forest Ridge Rd	Mooresville	NC	28117-6519
921.	Julie	Barnes	12409 Shallowford Dr	Raleigh	NC	27614
922.	Heather	Edmonds	44 Teptal Terrace	Bryson City	NC	28713
923.	Debbie	Mcmannis	467 Governors View Rd	Asheville	NC	28805
924.	Dennis	Shuford	302 Lakewood Dr.	Asheville	NC	28803
925.	Melissa	Hsu	200 Courtland Place	Asheville	NC	28801
926.	Timothy	Birthisel	19 Sourwood Ln	Asheville	NC	28805-2626
927.	Alice	Summey	Po Box 460	Saluda	NC	28773
928.	Charles	Talley	8643 Windsor Ridge Dr	Charlotte	NC	28277-6560
929.	Robert	Weber	104 Cypress Pt	New Bern	NC	28560
930.	Cassie	Welsh	205 Resada Dr	Brevard	NC	28712
931.	Ann	Dew	2102 Shaw Rd	Monroe	NC	28112-9018
932.	Anne	Roberts	400 Charlotte St	Asheville	NC	28801
933.	C	Grimes	6317 Rustic Rdg	Hope Mills	NC	28348
934.	Erica	Kitchen	6309 Kent Cv	Raleigh	NC	27617
935.	Katherine	Schlosser	1402 Bearhollow Rd	Greensboro	NC	27410
936.	Pamela	Culp	42 River Walk Dr	Asheville	NC	28804
937.	Adrien	Guillory	321 Lookout Dam Rd	Statesville	NC	28625
938.	Tina	Vazquez	50 Compass Park Dr	Weaverville	NC	28787
939.	A.P.	Hall	680 Timberlane Drive	Boone	NC	28607
940.	Beth	Chavis	2010 Gold Hill Rd	Shannon	NC	28386
941.	Teresa	Baker	Po Box 1008	Creedmoor	NC	27522
942.	Lucy	Tyndall	2958 Caldwell Ridge Pkwy	Charlotte	NC	28213-5888
943.	John	Gerwin	1008 Ravenwood Dr	Raleigh	NC	27606
944.	Brenda	Breeze	Walnut Grove	Hillsborough	NC	27278

945.	Bonnie	Clemens	3411 Wellington Ridge Loop	Cary	NC	27518
946.	Bridget	Davenport	7700 Falcon Rest Circle	Raleigh	NC	27615
947.	Cathy	Chapman	Po Box 147	Efland	NC	27243-0147
948.	Christina	Sykes	531 Lashley Rd	Chapel Hill	NC	27516
949.	Doug	Christensen	1215 Areca Way	Durham	NC	27703-4666
950.	Bob	Daly	7616 Almasen Way	Cary	NC	27511
951.	Dave	Rhuberg	3249 Journey	Lenoir	NC	28645
952.	Douglas	Evans	105 Summerwalk Ct	Cary	NC	27518
953.	Tom	O'Neal	113 Pinecrest Rd	Durham	NC	27705
954.	Elizabeth	Lansing	30 Orchard Vw	Chapel Hill	NC	27517
955.	Madeline	Mcclenney-Sadler	Not Public	Huntersville	NC	28078
956.	Elizabeth	Mathews	5105 Twelvepole Drive,	Raleigh	NC	27616
957.	Mason	Burton	5413 Lawrence Orr Rd	Charlotte	NC	28212
958.	Frank	Williams	Bruce Drive	Dunn	NC	28334
959.	Gavin	Dillard	528 Padgettown Rd	Black Mountain	NC	28711-9408
960.	Harriette	Griffin	1625 Glenwood Ave	Raleigh	NC	27608
961.	James	Kapetsky	7706 Meadowlark Ln Apt 2	Wilmington	NC	28411-9724
962.	Rev. Jay	Leach	234 North Sharon Amity Road	Charlotte	NC	28211
963.	Judith	Utley	111 Halls Creek Dr	Swansboro	NC	28584-9675
964.	Joanne	Studders	2317 Byrd St	Raleigh	NC	27608
965.	Jolene	Hollowell	703 Carbon City Rd	Morganton	NC	28655
966.	J	Winslow	792 Po	Holly Springs	NC	27540
967.	Lorri	Drozdyk	7411 Troon Lane	Hillsborough	NC	27278
968.	Polly	Letourneau	2304 Mont Haven Dr	Durham	NC	27712-1931
969.	Nancy	White	13012 Melvin Arnold Rd	Raleigh	NC	27613
970.	Katie	Boatner	107 Kirkman St Ste 101	Raleigh	NC	27601
971.	Alison	Yarborough	1011 Jacobs Trl	Hillsborough	NC	27278
972.	Radouane	Arbaoui	3003 Richward Pl	Raleigh	NC	27607-5224
973.	Michelle	Wild	591 Nickel Creek Ct	Kernersville	NC	27284
974.	Molly	Moore	215 Incline Dr	Vilas	NC	28692
975.	Elizabeth	Andrews	23 Hawks Spiral Way	Pittsboro	NC	27312
976.	Luvi	Valino	3615 Sunchase Dr	Fayetteville	NC	28306-8092
977.	Carole	Schaefer	40 Gerber Rd	Asheville	NC	28803
978.	Carolyn	Kanter	118 Maple Dr Apt 1A	Asheville	NC	28805
979.	Linda	Block	3 Sandy River Rd	Leicester	NC	28748-6369

980.	Neil	Infante	5303 Lucas Farm Ln	Chapel Hill	NC	27516
981.	Meredith	Hebden	1911 Graybark Ave	Charlotte	NC	28205
982.	Dakota	Minear	2814 Oberry Street	Raleigh	NC	27615
983.	Noah	Harris	9602 Art Rd	Cedar Grove	NC	27231
984.	Ellen	Osborne	6731 Hunt Rd	Pleasant Garden	NC	27313
985.	Peggy	Mcgraw	30Th St Ne	Hickory	NC	28601
986.	Robert	Ponzoni	1201 Canal Dr	Carolina Beach	NC	28428
987.	Randall	Dail	495 River Bluff Dr Unit 3	Shallotte	NC	28470
988.	Roxanne	Armstrong	1060 Monmouth Loop	Cary	NC	27513
989.	Regina	Stacey	299 Malcolm Blvd	Rutherford College	NC	28671
990.	Robert	Turner	2200 Bloomsbury Manor Dr	Durham	NC	27703-7888
991.	Sandy	Ford	932 New River Bnd S	Fleetwood	NC	28626
992.	Susan	Bartlett	4 Lagrange Dr	Asheville	NC	28805-0016
993.	Beth	Shaffer	1512 Valleymede Rd	Greensboro	NC	27410-3940
994.	Sandra	Sly	Po Box 2974	Surf City	NC	28445
995.	Katherine	Solomita	1010 Leesburg Dr	Leland	NC	28451
996.	Shannon	Ryan	15046 Deshler Ct	Charlotte	NC	28273
997.	Tonya	Taylor	175 Harris Rd	Smithfield	NC	27577
998.	Patricia	Mena	4413 Haskell Dr	Fayetteville	NC	28306
999.	Peter	Van Schaack	4904 Starmount Drive	Greensboro	NC	27410
1,000.	Barbara	Dornbush	41 Fox Falls Lane	Highlands	NC	28741-6661
1,001.	Mary	Davis	513 Princeton St	Raleigh	NC	27609-5907
1,002.	Tameka	Davis	1511 Pinewinds Dr Apt 203	Raleigh	NC	27603
1,003.	Jim	Smith	4620 Mial Plantation Rd	Raleigh	NC	27610
1,004.	Lauren	Wright	253 Marsh Hen Dr	Wilmington	NC	28409-3519
1,005.	Athena	Rios	242 Holly Spring Vill Rd Lot 2	Franklin	NC	28734-1931
1,006.	Marina	Little	101 Pender Ln	Brevard	NC	28712-0074
1,007.	Elizabeth	Dotts	1435 Forge Creek Ct #Cr	Gastonia	NC	28054
1,008.	Sandra	Cooke	937 Baker Dr	Haw River	NC	27258-9755
1,009.	Candace	Harrell	217 Kaiser Rd	Delco	NC	28436
1,010.	Kevin	Keen	14 Oak Leaf Dr	Fletcher	NC	28732-9547
1,011.	Todd	Patton	4512 Bracada Dr	Durham	NC	27705
1,012.	Hannah	Hogan	5534 Sharpe Dr	Raleigh	NC	27612-3010
1,013.	Karen	Ninos Carpenter	315 Woodland Trl	Hendersonville	NC	28739-3957
1,014.	Frank	Croft	105 W Catawba St	Morganton	NC	28655

1,015.	Lori	Del Negro	6900 Three Bridges Cir	Raleigh	NC	27613
1,016.	Ellen	Dowling	3280 Mannington Dr	Charlotte	NC	28270
1,017.	Peyton	Vaughn	2732 University Dr	Durham	NC	27707
1,018.	Stacey	Washington	2421 Castlebar Dr Apt 102	Fayetteville	NC	28311-1570
1,019.	Darlene	Savage	351 Harts Ln	Rocky Point	NC	28457-8038
1,020.	Desiree	Pugh	287 Morning Dew	Concord	NC	28025
1,021.	Cheryl	Stahl	289 Dirt Rd	Hamlet	NC	28345-7312
1,022.	Laila	Brown	505 Sussex Ave	Sanford	NC	27330
1,023.	Jolanta	Lewtak	211 Parsley Ln	Mocksville	NC	27028
1,024.	Hailey	Martin	1102 N Guthrie Ave	Durham	NC	27703
1,025.	Thomas	De Walle	10013 Fountain	Chapel Hill	NC	27517
1,026.	Veronica Wells	Veronica Wells	6824 Saint Julian Way	Fayetteville	NC	28314
1,027.	Barbara	Grady	4927 N Nc Highway 111	Seven Springs	NC	28578-7550
1,028.	Marty	Hatcher	675 Chas Court	High Point	NC	27265
1,029.	Debbie	Clayton	712 Oak Grove Rd	Roxboro	NC	27574
1,030.	Andy	Ralston-Asumendi	3207 Van Allen Cir	Greensboro	NC	27410
1,031.	Caleb	Magoon	165 Coleman Ave	Asheville	NC	28801-1386
1,032.	Kelly	Backman	4250 Wright Ave	Charlotte	NC	28211-2406
1,033.	Sharon	Van Horn	45 Pine Hill Rd	Franklin	NC	28734-3708
1,034.	Laura	Carnal	304 E Fork Rd	Marshall	NC	28753-8212
1,035.	James	James	8922 Hunters Pointe Dr	Huntersville	NC	28078-9000
1,036.	Gwen	Leggett	319 Beaten Path Rd	Mooresville	NC	28117-8980
1,037.	Kyshanna	Patman	3650 Meadow View Rd Apt 2	Lumberton	NC	28358
1,038.	Jazmin	Alvarado	4120 Howie Cir	Charlotte	NC	28205-1437
1,039.	Magnolia	Conway	1304 Laura Duncan Rd	Apex	NC	27502-1536
1,040.	Debby	Hanks	1703 Farm Lake Dr	Holly Springs	NC	27540
1,041.	Linda	Royal	5207 Clear Run Dr	Wilmington	NC	28403-1916
1,042.	Jolanta	Lewtak	4820 Kinnamon Rd	Winston Salem	NC	27103
1,043.	Susan	Skoda	7727 Monarch Dr	Wilmington	NC	28411
1,044.	Sherry	Porter	1020 Maplechase Dr Se	Leland	NC	28451
1,045.	Cathy	Buresch	9622 Walkers Glen Drive Nw	Concord	NC	28027
1,046.	Abbey	Durr	1408 Woodsman Ct, None	High Point	NC	27265
1,047.	Daniel	Deceder	2812 Hillsborough Road	Durham	NC	27705
1,048.	April	Ingle	6240 Spurgeon Way	High Point	NC	27265
1,049.	Jeffrey	Collins	57 Forest At Duke Dr	Durham	NC	27705-5639

1,050.	Dick	Christensen	1213 Areca Way	Durham	NC	27703-4666
1,051.	Erin	Healy	3301 Foxridge Rd	Charlotte	NC	28226-7388
1,052.	Wendy	Glen	4625 Vienna Dozier Rd	Pfafftown	NC	27040
1,053.	Janice	Phillips	840 Bermuda Ave	Gastonia	NC	28054
1,054.	Lauren	Sharpe	3024 Spring Fancy Ln	Indian Trail	NC	28079-5233
1,055.	Ariana	Carrasco	3520 Yorkgate Ln	Fayetteville	NC	28306-6401
1,056.	Megan	Berry	1418 Mcarver St	Gastonia	NC	28052-0705
1,057.	Hannah	Love	900 Borage Dr	Wake Forest	NC	27587-5150
1,058.	Diane	Wallace	2503 Nc Highway 66 S	Kernersville	NC	27284
1,059.	Ennette	Guzman	3300 Dawn Ridge Ct	Greensboro	NC	27410-8661
1,060.	Steven	Matteson	2061 Simmerman Way	Leland	NC	28451-9490
1,061.	Julie	Mayer	7 Robin Ln	Weaverville	NC	28787
1,062.	Michael	Jones	1725 Hammond St	Rocky Mount	NC	27803
1,063.	Maggie	Stone	9051 Strickland Rd Ste 200	Raleigh	NC	27615-2084
1,064.	Juanita	Thompson	3422 Leaning Pine Dr	Lincolnton	NC	28092-5400
1,065.	Susan	Goodman	234 Summerfield Pl	Flat Rock	NC	28731
1,066.	Tonya	Mercer	3258 Sandhill Dr	Fayetteville	NC	28306
1,067.	Bonnie	Wright	2209 Englewood Ave	Durham	NC	27705-4013
1,068.	Corey	Ferris	3707 Waterton Leas Ct	Charlotte	NC	28269
1,069.	Lorraine	Atwell	4192 Medford Dr Nw	Concord	NC	28027-4516
1,070.	Cynthia	Wines	226 Harris Rd	Clyde	NC	28721
1,071.	Tonya	Mull	1891 29Th St Ne	Hickory	NC	28601-3262
1,072.	Callie	Lafave	201 Willoughby Blvd	Greensboro	NC	27408-4416
1,073.	Arianna	Medina	1011 Holmes Rd	Pinnacle	NC	27043-8587
1,074.	Monika	Klein	8215 Shadow Oaks Dr Apt 421	Charlotte	NC	28269-2410
1,075.	Jill	Mountjoy	128 Larchmont Dr	Hendersonville	NC	28791-9736
1,076.	Lorraine	Loren	40 Rocky Springs Rd	Taylorsville	NC	28681
1,077.	Jessica	Colon	423 Tulip Tree Rd	Hillsborough	NC	27278-9693
1,078.	Dana	Sargent	909 Cobia Ln	Wilmington	NC	28409
1,079.	Andrew	Causey	48 Pisgah Dr	Waynesville	NC	28786
1,080.	Ann	Green	740 Three Mile Knob Rd	Pisgah Forest	NC	28768
1,081.	Timothy	Burgin	140 N. Bear Creek Road	Asheville	NC	28806
1,082.	Ann Scott	Thompson	8405 Bells Lake Rd	Apex	NC	27539
1,083.	June	Kurtz	103 Bridgewater Ct	Chapel Hill	NC	27517
1,084.	Ellen	Cohen	363 Fearington Post	Pittsboro	NC	27312-8517

1,085.	Bridget	Trenado	101 Tahoe Lane	Troutman	NC	28166
1,086.	Robert	Hearn	1082 Nichols Dr	Raleigh	NC	27605
1,087.	Mari	Diouf	4600 University Dr Apt 418	Durham	NC	27707-6117
1,088.	Fred	Lampe	1710 Michaux Rd	Chapel Hill	NC	27514-7636
1,089.	Veronica	Kalma-Bruton	602 2Nd St	Spencer	NC	28159-2327
1,090.	Alexandra	Aaron	241 Elk Mountain Rd	Asheville	NC	28804-2056
1,091.	Angie	Hernandez	311 Pickett Pl	High Point	NC	27262-6969
1,092.	Jaymie	Googins	108 Sandpiper Dr	Mooresville	NC	28117-6667
1,093.	Carol	Lackey	270 Skyuka Road	Statesville	NC	28677-2086
1,094.	Rebecca	Helgesen	902 Shellbrook Court, Apt 3	Raleigh	NC	27609
1,095.	David	Caldwell	540 Belwood Lawndale Rd	Lawndale	NC	28090
1,096.	Kathy	Lehmkuhler	42194 Park Dr # 600	Avon	NC	27915
1,097.	Rebecca	Williams	3880 Whitehaven Rd	Winston Salem	NC	27106
1,098.	Jeffery And Pamela	Mastin	417 Hawk Ridge Road	Deep Gap	NC	28618
1,099.	Angela	Hayes	521 Courtwood Ln Apt 7	Hendersonville	NC	28739-1349
1,100.	Michael	Worthy	10717 Patrician Way	Zebulon	NC	27597-7972
1,101.	Anne	Baldwin	107 Lobster Ln	Sneads Ferry	NC	28460
1,102.	Barbara	Benson	104 Deerfield Ct	Cedar Point	NC	28584
1,103.	Lisa	Sears	7407 Privet Ct	Wilmington	NC	28411-1016
1,104.	Melissa	Gaul	3808 La Costa Way	Raleigh	NC	27610
1,105.	Gloria	Green	1306 Maple Ridge Rd	Wilmington	NC	28411-7410
1,106.	Clark	Pearson	1128 Kitchens Branch Rd	Sylva	NC	28779-7760
1,107.	Walter	Wood	304 Hedrick St	Beaufort	NC	28516
1,108.	Laura	Lathan	1312 Gateshead Ln	Matthews	NC	28105
1,109.	Lee	Andrews	4204 Enchanted Ln	Greensboro	NC	27406-6906
1,110.	Carole	Newsome	7211 Emerald Drive	Emerald Isle	NC	28594
1,111.	James	Seramba	1501 Crows Landing Cir	Wilmington	NC	28403-5355
1,112.	Donna	Oliver	300 Carolina Ave	Gastonia	NC	28098
1,113.	Edward	Martel	10055 Bishops Gate Blvd	Pineville	NC	28134-6568
1,114.	Cathy	Parisi	24A Powers Ridge Rd	Weaverville	NC	28787
1,115.	Gina	Epley	445 Ned Marsh Rd	Salisbury	NC	28146
1,116.	Katherine	Mahoney	208 Wildwood Rd	Havelock	NC	28532-2726
1,117.	Debbie	Bolick	4310 Hazlitt Ct	Charlotte	NC	28269-8342
1,118.	Jazmin	Gamez	83 Morning Ln	Hendersonville	NC	28792-8072
1,119.	Angela	Hessenius	2748 Campus Walk Ave Apt 15C	Durham	NC	27705

1,120.	Emily	Valentine	610 Kentucky Derby Ln	Lillington	NC	27546-9742
1,121.	Kristi	Carpenter	4025 8Th Street Ln Ne	Hickory	NC	28601
1,122.	Amanda	Hendricks	29 Streamwood Way	Clayton	NC	27527-4236
1,123.	Miriam	Angress	2608 University Dr	Durham	NC	27707
1,124.	Marie	Arthur	318A Neuse Forrest Ave Apt A	New Bern	NC	28560
1,125.	Tymothy	Diaz	6012 Grey Fox Ln	Lexington	NC	27295
1,126.	Kirsten	Earley	940 Hidden Valley Rd	Clyde	NC	28721-8840
1,127.	Terilyn	Palanca	59 Pinewood Rd	Asheville	NC	28805
1,128.	Bonnie	Dugan	42 Speyside Circle	Pittsboro	NC	27312
1,129.	Conrad	Smith	3610 Highlands Rd Lot 2	Franklin	NC	28734-8996
1,130.	Evelyn	Cotton	1705 E Cornwallis Rd Apt A	Durham	NC	27713-1489
1,131.	Betty	Sherrill	721 Harris Ave Nw	Valdese	NC	28690-2135
1,132.	Barbara	Veliskakis	6205 Morrison Blvd Apt 813	Charlotte	NC	28211-5147
1,133.	Angel	B	4609 Hidden Hollow Ln	Knightdale	NC	27545-8021
1,134.	Diane	Clark	4115 Castleford Dr	Colfax	NC	27235-9704
1,135.	Sharon	Zeilstra	1312 Park Summit Blvd	Apex	NC	27523
1,136.	Charlene	Grattan	3838 Robeson Creek Dr	Charlotte	NC	28270-1131
1,137.	Karen	Gray	948 Union Ridge Rd	Burlington	NC	27217-8600
1,138.	Caroline	Laur	12671 Nc Hwy 62	Burlington	NC	27217
1,139.	Sharon	Vinson	703 Vinson Rd	Burlington	NC	27217
1,140.	Sharon	Williams	396 John Russell Road	Prospect Hill	NC	27314
1,141.	Beverly	Mathews	14607 Batteliere Dr	Charlotte	NC	28278
1,142.	Bridget	Esposito	325 Crimson Way	Pittsboro	NC	27312-9866
1,143.	Michael	Andrews	810 W 4Th St	Winston Salem	NC	27101
1,144.	Erin	Schmidt	9 Hamburg Mountain Rd	Weaverville	NC	28787-9305
1,145.	Julie	Byrd	809 Spring Ave	Murfreesboro	NC	27855
1,146.	Andi	Li	278 Old Nc Highway 86 N	Yanceyville	NC	27379
1,147.	Manny	Medeiros	106 Dunraven Ct.	Matthews	NC	28104
1,148.	Jennifer	Roberts	619 Clement Ave	Charlotte	NC	28204
1,149.	Alice	Setliff	1166 Narrow Gauge Rd	Reidsville	NC	27320
1,150.	James	Wilson	6624 Hidden Pond Rd	Wendell	NC	27591-8146
1,151.	Jennifer	Christley	4313 Burton Rd	Thomasville	NC	27360
1,152.	Mary	Western	130 Aaron Rd	Elkin	NC	28621-3104
1,153.	Malinda	Messer	166 Mauney Cove Rd Apt 8	Waynesville	NC	28786-6262
1,154.	Jean-Luc	Duvall	210 Loft Ln Apt 133	Raleigh	NC	27609-3886

1,155.	Allison	Geberin	33 Green Mountain Ln	Fletcher	NC	28732-7458
1,156.	Louise	Peterson	15 Old Cove Rd	Black Mountain	NC	28711-8718
1,157.	Eric	Vazquez	116 Holly Oak Way	Mooreville	NC	28115
1,158.	Karen	Loveless	7411 Haven Way	Wilmington	NC	28411-7158
1,159.	Margaret	Newton	102 College Station Dr Ste 3	Brevard	NC	28712
1,160.	Lilla	Gutay	5 Bramerton Ct	Durham	NC	27705
1,161.	Rachel	Koerner	107 Pine Burr St	Fuquay Varina	NC	27526
1,162.	Patrick	Conroy	709 First Ave West, House	Hendersonville	NC	28739
1,163.	Cindy	Rees	3325 Ponderosa Dr	La Grange	NC	28551-8067
1,164.	Patsy	Dalton	210 Pineville Rd	Statesville	NC	28677-2070
1,165.	Stella	Gibson	167 Mockingbird Ln	Mocksville	NC	27028
1,166.	Shirley	Davis	4683	Trinity	NC	27370
1,167.	Wayne	Manahan	6516 Weldon Cir Nw	Concord	NC	28027
1,168.	Diane	Assell	1400 Shalimar Dr	Concord	NC	28025-8109
1,169.	Kelly	Picarsic	4837 Water Oak Road #14	Charlotte	NC	28211
1,170.	Matilda	Phillips	185 Driftwood Lane	Winston Salem	NC	27104
1,171.	Kurt	Nichols	9204 Four Mile Creek Rd	Charlotte	NC	28277-9063
1,172.	Tullie	Johnson	1247 Kimbolton Dr	Cary	NC	27511-4830
1,173.	Patricia	Winkler	4938 Looking Glass Trl	Denver	NC	28037
1,174.	Jennifer	Franklin	1012 Green St	Durham	NC	27701-1520
1,175.	Nancy	Fallatt	1028 Fountainbrook Dr	Indian Trail	NC	28079-7619
1,176.	Melissa	Savini	1006 Willowedge Ct	Knightdale	NC	27545-8670
1,177.	Gail	Thomas	15680 Blair Ave	Laurinburg	NC	28352
1,178.	Shelton Clyde	Gallop	1070 Thorpe Rd	Rocky Mount	NC	27804-1906
1,179.	Georgia	Bowen	400 Edney Ridge Rd	Greensboro	NC	27408-3210
1,180.	Alec	York	2318 Indian Dr	Jacksonville	NC	28546-5273
1,181.	Linda	Blackburn	906 Memorial Dr W	Ahoskie	NC	27910-3720
1,182.	Susan	Thurlow	64 Second St	Tryon	NC	28782
1,183.	Robert	Davis	924 Louise Cir	Fayetteville	NC	28314-2707
1,184.	William Dubby	Fuqua	910 Cornelius Rd	Mooreville	NC	28117
1,185.	Gail	Abrams	4123 New Bern Pl	Durham	NC	27707-5328
1,186.	Alishia	Gardner	522	Badin	NC	28009
1,187.	Mary	Jeffrey	4906 Looking Glass Trl	Denver	NC	28037
1,188.	Barbara	Goodrich	8316 Dallas Bay Rd	Charlotte	NC	28278
1,189.	Tanner	Campbell	7037 Modern Way	Charlotte	NC	28217-6760

1,190.	Crystal Bostick	Bostick	2802 Lexington St	Durham	NC	27707
1,191.	Shirley	Good	450 Cherry Cove Dr Apt Apt-A	Kernersville	NC	27284
1,192.	Cindy	Jones	983 Caswell Station Rd	Kinston	NC	28501
1,193.	Virginia	Linman	1951 Waterford Pointe Rd	Lexington	NC	27292-6569
1,194.	Kimberly	Robinson	815 Crestway Ct	Marshville	NC	28103-9487
1,195.	Nancy	Botzek	3205 Stones Throw Ln Apt 5	Durham	NC	27713-2245
1,196.	Jewell	Spataro	162 Water Tower Dr	Forest City	NC	28043
1,197.	Tracey	Griffin	2700 Reynolda Rd	Winston Salem	NC	27106-3819
1,198.	Jeanie	Ahrens	4108 Kestrel Ct	Lenoir	NC	28645
1,199.	George	Sawyer	1301 Queens Rd Apt 103	Charlotte	NC	28207
1,200.	Ann	Milligan	506 Edmund Ct	Elon	NC	27244-8030
1,201.	Jade	Irving	94 Darrell Ln	Wanchese	NC	27981-9591
1,202.	Constance	Mitchell	28 Robinhood Rd	Asheville	NC	28804-1637
1,203.	Joyce	Pusel	15 Vauxhall Pl	Chapel Hill	NC	27517
1,204.	Jenafur	Maher-Bernard	4323 Mantua Way	Raleigh	NC	27604
1,205.	Bettina	Patterson	392 Lyndfield Close	Pittsboro	NC	27312
1,206.	Doris	Glecer	105 Pope Lake Rd	Belmont	NC	28012-7713
1,207.	Paul	Fallon	1712 Old Fort Road	Greenville	NC	27834
1,208.	Savannah	Whatley	209 Hunt Master Trl	Asheboro	NC	27205
1,209.	Doratha	Merchant	9916 Koupela Dr	Raleigh	NC	27614-9032
1,210.	Newton	Harmon	259 Katie Drive	China Grove	NC	28023
1,211.	Bailey	Hanna	208 Hampton Ln	Youngsville	NC	27596
1,212.	Jackie	Flood	140 Bambams Ln	Boone	NC	28607-9406
1,213.	Tim	Martin	51 Forest Rd	Canton	NC	28716
1,214.	Alison	Mullis	1708 Bianca Ct	Charlotte	NC	28214-9634
1,215.	Linda	Eastman	7048 Sevilleen Dr Sw	Ocean Isl Bch	NC	28469
1,216.	Brooklyn	Baker	60 Henrietta St	Asheville	NC	28801-1336
1,217.	Cherie	Morris	46 Short St	Asheville	NC	28801-2507
1,218.	Lucy	T	1144 Mckee Farm Ln	Belmont	NC	28012-8671
1,219.	Vivian	Villa	185 Lake Heron Dr	Cameron	NC	28326
1,220.	Henley	Younts	4211 University Station Rd	Chapel Hill	NC	27514-8213
1,221.	Tyler	Kindschuh	134 Forest Lane	Garner	NC	27529
1,222.	Francesca	Jones	497 Strawberry Dr	Hendersonville	NC	28792-9307
1,223.	Sarah	Taylor	726 Jim Latta Rd	Rougemont	NC	27572
1,224.	Rachel	Ruto	Saxon Ct	Clayton	NC	27527

1,225.	James	Stockwell	125 Morning Glory Ln	Burnsville	NC	28714
1,226.	Emily	Petrone	1010 W Trade St Apt 432	Charlotte	NC	28202-3374
1,227.	Leyra	Perez	7424 Pebblestone Dr Apt A	Charlotte	NC	28212
1,228.	Patricia	Brown	209 Landsbury Dr	Durham	NC	27707
1,229.	Tomeka	Lloyd	2164 Ladyslipper Dr	Fayetteville	NC	28306
1,230.	Sandra	Dean	3978 Macedonia Church Rd	Fayetteville	NC	28312-7054
1,231.	Chloe	Jones	198 Brookridge Dr	Forest City	NC	28043-9146
1,232.	James	Barnes	129 Squire Dr	Winterville	NC	28590-9429
1,233.	Rebecca	Vanhoeck	3231 S Walnut Creek Pkwy	Raleigh	NC	27606
1,234.	Carlton	Frye	516 Bay Lake St	Chocowinity	NC	27817-8855
1,235.	Katherine	Williams	123 George Wilton Dr	Clayton	NC	27520-9207
1,236.	Autumn	Lewis	100 Warbler Rd	Pfafftown	NC	27040
1,237.	Elizabeth	Whitt	1116 Scaleybark Rd Apt 116B	Charlotte	NC	28209-4509
1,238.	James	Southerland	103 Moray Ct	Cary	NC	27511-6532
1,239.	Angela	Schmoll	229 Lee Fowler Rd	Mount Airy	NC	27030-7730
1,240.	Patty L	Smith	106 Tanglewood Court	Southern Pines	NC	28387
1,241.	Valerie	Harvey	1035 Ryan Ln	Walnut Cove	NC	27052
1,242.	Bobbie	Reddick	1001 Brandon Rd	Durham	NC	27713-1227
1,243.	Amy	Powell	5160 Redhaven Ln Nw Unit C	Concord	NC	28027-2457
1,244.	Constance	Goeden	2309 Happy Trails Rd	Clayton	NC	27520
1,245.	Amy	Devereaux	512 Contessa Ct	Clayton	NC	27520
1,246.	Maria	Ishmael	1120 Scaleybark Rd	Charlotte	NC	28209-4569
1,247.	Aneve	Carter	114 Spargo St	Gastonia	NC	28056-9610
1,248.	Deborah	Owens	107 Pine Burr St	Fuquay Varina	NC	27526-7761
1,249.	William	Reavis	1105 Piney Grove Rd	Kernersville	NC	27284
1,250.	Sharon	Benissan	4626 W Market St Ste C #106	Greensboro	NC	27407-2975
1,251.	David	Depicciotto	13040 Horned Lark Dr	Charlotte	NC	28278-6959
1,252.	Sarah	Moran	1200 Emerald Dr.	Concord	NC	28025
1,253.	Reagan	Peterson	214 Courtney Ln	Matthews	NC	28105
1,254.	Mary	Abrams	351 Luke Meadow Ln	Cary	NC	27519
1,255.	Deborah	Torrence	1110 20Th St Ne	Hickory	NC	28601-4324
1,256.	Harriet	Loftin	671 Terry Ln	Jacksonville	NC	28546-5155
1,257.	Stefan	Walz	100 Parkrise Ct	Cary	NC	27519-7590
1,258.	Connor	Moore	13230 Ballantyne Corporate Pl 411	Charlotte	NC	28277
1,259.	Janet	Lamson	61 Herron Ave	Asheville	NC	28806-3457

1,260.	Allie	Carrington	638 Gallimore Rd	Brevard	NC	28712-9550
1,261.	Jose	Zamora	Po Box 191	Fletcher	NC	28732-0191
1,262.	Christy	Fritz	5 Patti Lane #101	Asheville	NC	28804
1,263.	Jared	Leeds	122 Dapple Ct, Apt 204	Wilmington	NC	28403
1,264.	Lakemma	Dubose	850 Amelia Church Rd	Clayton	NC	27520-6710
1,265.	Marisa	Munoz	7813 Twin Pines Way	Fuquay Varina	NC	27526-5408
1,266.	Adolf	Rommel	17 Rugby Knoll Dr	Hendersonville	NC	28791
1,267.	Wanda	Johnson	1010 Jasper St	Clinton	NC	28328-2340
1,268.	Michelle	Thomas	10638 Jardin Way	Charlotte	NC	28215-8044
1,269.	Terry	Gebel	1702 Dartmore Dr N Apt 4	Wilson	NC	27893-1950
1,270.	Marilyn Twitty	Brown	1725 Madison Ave	Charlotte	NC	28216-5412
1,271.	Paula	Mcphail	2122 Clinchfield Dr	Fayetteville	NC	28304
1,272.	Halcyon	Learned	613 Upper Browns Creek Rd.	Burnsville	NC	28714
1,273.	Lynn	Culler	5532 Pine Glen St	Southport	NC	28461
1,274.	Linda	Anderson	1518 Reynard Dr	Kernersville	NC	27284-9426
1,275.	Rose	Greear	902 Riverwood Dr	Lexington	NC	27292
1,276.	Samuel	Todd	8801 Brigadier Ln	Mint Hill	NC	28227
1,277.	Arun	Subbanna	544 Manhasset Rd	Charlotte	NC	28209-2822
1,278.	Carol	Kulikowski	203 Deer Creek Ln	Greenville	NC	27834-0516
1,279.	Jess	Jannenga	7718 Leisure Ln	Huntersville	NC	28078-5316
1,280.	Mary	Tribble	42 Blue Spruce Ln	Hendersonville	NC	28739-6346
1,281.	Elizabeth	Pierce	135 E Wilson Ave Apt B	Mooresville	NC	28115
1,282.	Lenore	Madeleine	700 Vista Lake Dr Apt 308	Candler	NC	28715
1,283.	Lynden	Harris	9602 Art Road	Cedar Grove	NC	27231
1,284.	Ann	Baize	499 Toms Creek Trail	Yanceyville	NC	27379
1,285.	Michael	Wang	4011 Westchase Blvd	Raleigh	NC	27607
1,286.	Cathy	Pesceovich Kreplin	608 Harbour View Drive	Kill Devil Hills	NC	27948
1,287.	Dorothy	Alspaugh	105 Bashavia Woods Trl	Pfafftown	NC	27040
1,288.	Helen	Schillaci	140 Lake Hills Rd	Pinehurst	NC	28374-9628
1,289.	Dana	Mccraw	811 Oxfordshire Ln	Chapel Hill	NC	27517
1,290.	Thomas	Hollis	123 Hawthorne Ln	Boone	NC	28607-5418
1,291.	Kurt	Steinbaugh	122 Woodcliff Loop	Newland	NC	28657-8155
1,292.	Manuela	Bowks Delarosa	3533 Ivy Commons Dr Unit 101	Raleigh	NC	27606
1,293.	Chih-Wei	Chuang	919 Vickie Dr	Cary	NC	27511
1,294.	Hania	Droubi	10310 Sugar Erry Ct	Raleigh	NC	27614

1,295.	Sharon	Lovecky	3950 Scotts Hill Loop Rd	Wilmington	NC	28411-6606
1,296.	Sherry	Jones	93 Summer Ln	Jacksonville	NC	28540-9171
1,297.	Dr.	Martinelli	2235 Gunn Poole Rd	Mebane	NC	27302
1,298.	Erin	Flower	6750 Poppy Hills Ln	Charlotte	NC	28226
1,299.	Richard	Lonon	9602 Art Rd	Cedar Grove	NC	27231
1,300.	Rocky	Hendrick	630 Sandridge Rd	Charlotte	NC	28210
1,301.	Robin	Shepard	902 Overhill Rd	Salisbury	NC	28144-9032
1,302.	George	Wilson	141 Our Rd	Carthage	NC	28327-9689
1,303.	Mf	Solomon	2 Stillwater Park	Durham	NC	27707-6125
1,304.	Sasha	Mcclure	148 Arborvitae Dr	Atlantic Beach	NC	28512-6200
1,305.	Michael	Roche	7 Briarwood Ln	Fletcher	NC	28732
1,306.	Sarah	Wright	1459 Hideaway Mountain Dr	Murphy	NC	28906
1,307.	Kathe	Mcbeth	12202 Pine Valley Club Dr	Charlotte	NC	28277
1,308.	Cheryl	Hopkins	Po Box 896	Buxton	NC	27920
1,309.	Carter	D	221 Craven St	Fayetteville	NC	28306
1,310.	James	Markham	1005 Glenwood Ave	Greensboro	NC	27403-2908
1,311.	Jackie	King	2514 Buckleigh Dr	Charlotte	NC	28215-7545
1,312.	Monica	Pruette	4010 Robinson Rd	Newton	NC	28658-8792
1,313.	Roxanna	Demers	253 Old Grove Ln	Apex	NC	27502
1,314.	Cynthia	Simonds	704 Laurel Ave	Black Mountain	NC	28711
1,315.	Julie	Eldridge	567 Elk Shoals Creek Rd	Burnsville	NC	28714-6032
1,316.	Michael De Leon	Walker	302 E King St	Edenton	NC	27932
1,317.	Maryann	Clarke	15557 Birkdale Commons Pkwy	Huntersville	NC	28078-4948
1,318.	Janice	Mcneil	5200 Grenelafe	Charlotte	NC	28269
1,319.	Tereza	Hall	801 Buckberry Dr # 2165	Sapphire	NC	28774
1,320.	Jack	Hollingsworth	5 Lori Ln	Oriental	NC	28571-9705
1,321.	Aaron	Levy	550 Sandridge Rd	Charlotte	NC	28210
1,322.	Matt	Mcmullen	555 Delburg St	Davidson	NC	28036
1,323.	Carolyn	Ashburn	498 Chisholm St	Saluda	NC	28773
1,324.	Carole	Labrum	1818 Us 15 501 S	Chapel Hill	NC	27517
1,325.	Olivia	Fennell	6302 Gadwall Ct	Wilmington	NC	28403-1923
1,326.	Maria	Ilinets	4700 Morrowood Ln	Charlotte	NC	28216
1,327.	Eva	Weinmann	27B Spooks Mill Cove	Asheville	NC	28804
1,328.	James	Benson	15323 E Rock Ct	Davidson	NC	28036
1,329.	Emily	Tadlock	6322 Kiftsgate Ct	Charlotte	NC	28226-5576

1,330.	Amy	Suhy	311 Morrow Dr	Forest City	NC	28043
1,331.	Remy	Bates	1513 Rosewood St	Durham	NC	27707-6147
1,332.	Norma	Alvarado	878 Bitting Hall Dr	Rural Hall	NC	27045
1,333.	Charlene	Washington	110 Batchelder Rd	New Bern	NC	28560
1,334.	Maria	Castro	5831 Blacksmith Dr	Raleigh	NC	27606
1,335.	Sarah	Hodder	1017 W Trinity Ave	Durham	NC	27701
1,336.	Rhiannon	Buchman	821 Handsworth Ln	Raleigh	NC	27607
1,337.	Gerry	Hoots	3627 Dewsbury Rd	Winston Salem	NC	27104-1749
1,338.	Courtney	Ashley	419 Webb Rd	Shelby	NC	28152
1,339.	Rachel	Biggs	4504 Crowne Lake Circle	Jamestown	NC	27282
1,340.	Nikki	Schwartz	43 Golden Lane	Leicester	NC	28748
1,341.	Dianne	Welborn	600 S Holden Rd	Greensboro	NC	27407-1324
1,342.	Loryn	Brooker	712 Shell Rd	Surf City	NC	28445-8762
1,343.	Barbara	Cummings	3787 Burtons Barn St	Raleigh	NC	27610-4697
1,344.	Brenda	Brown	6333	Yanceyville	NC	27379
1,345.	Marilyn K	Coats	29 Independence Blvd	Asheville	NC	28805
1,346.	William	Rogers	713 Milburn Landing Circle	Garner	NC	27529
1,347.	Valen	Del Bonis	130 Turquoise Dr	Jacksonville	NC	28546-8757
1,348.	Mark	Langan	1705 Wallace Street	Durham	NC	27707
1,349.	Betsy	Freeman	7307 Sheffingdell Dr	Charlotte	NC	28226
1,350.	David	Gilbert	808 Twyckenham Dr	Greensboro	NC	27408-8628
1,351.	Crystal	Culler	285 Wills Way	Sanford	NC	27332
1,352.	Kristen	Olberz	3 Jenny St	Asheville	NC	28806-4306
1,353.	John	Bromer	255 Lakey Gap Acres	Black Mountain	NC	28711
1,354.	Willie	Smith	412 Harper St	Winston Salem	NC	27104-3818
1,355.	Ben	Howard	201 Macy Street	Greensboro	NC	27408
1,356.	Suzanne	Lindheimer	12 Westminster Dr	Asheville	NC	28804
1,357.	Adam	Mills	408 Depot St Apt 203	Asheville	NC	28801
1,358.	Alex	Blaine	10518 Kettering Dr Apt 711	Charlotte	NC	28226
1,359.	Jessika	Aldridge	3602 Country Club Rd	Trent Woods	NC	28562-7712
1,360.	Sharon	Gideon	101 Silhouette Drive	Greensboro	NC	27405
1,361.	P.	Clark	2084 Riceville Rd	Asheville	NC	28805
1,362.	Frank	Hartig	1220 Thompson Rd	Durham	NC	27704
1,363.	Jeannie	Stroupe	3408 Angus Road	Durham	NC	27705
1,364.	Braxton	Leonard	4000 Boone Trl	Millers Creek	NC	28651

1,365.	Stephen	Blundell	4400 Dublin Castle Rd	Greensboro	NC	27407
1,366.	Mary	Mcqueen	171 Inglenook Rd	Hendersonville	NC	28792
1,367.	Mary Ann	Oglia	64 Bear Paw Hill Rd	Franklin	NC	28734-6898
1,368.	Mimi	Austin	1422 Somersby Cir	Gastonia	NC	28054
1,369.	Deeanna	Kringle	627 Aquarius Dr	Wilmington	NC	28411
1,370.	Mark	Hemenwway	7700 Covey Chase Dr	Charlotte	NC	28210-7208
1,371.	Angelica	Villarreal	501 Willard St	Durham	NC	27701
1,372.	Alicia	Wernick	100 River Mill Dr	Asheville	NC	28803
1,373.	Valerie	Whitfield	19721 Feriba Pl	Cornelius	NC	28031
1,374.	Marsha	Schlesinger	217 Brookwood Ave	Wilmington	NC	28403
1,375.	Eddie	Huskey	140 Regency Dr	Reidsville	NC	27320
1,376.	Rita	Gregory	220 Chestnut Oak Place	Durham	NC	27704
1,377.	Matthew	Lewis	8911 Coppermine Ln	Charlotte	NC	28269
1,378.	George	Carr	206 N. Hill St.	Faison	NC	28341
1,379.	John	Wiles	5205 Langford Ter	Durham	NC	27713
1,380.	Deborah	Fix	102 Balboa Court	New Bern	NC	28560
1,381.	Colleen	Payne	131 Skipwyth Cir	Cary	NC	27513
1,382.	Sarah	Hunkins	3205 Ward Rd.	Raleigh	NC	27604
1,383.	Lynn	Huang	4225 Larchmont Rd #922	Durham	NC	27707
1,384.	Sue	Hayes	213 Quilon Circle	Wilmington	NC	28412
1,385.	Gary	Richards	601 West Rosemary St	Chapel Hill	NC	27416
1,386.	Billie	Barbour	100 Laurelwood Lane	Cary	NC	27518
1,387.	Liam	Bradford	5932 Church Rd	Graham	NC	27253
1,388.	Felicia	Audelo	418 Bridle Path Rd	Goldsboro	NC	27534
1,389.	John	Sanders	6 Anderson Ridge Road	Mebane	NC	27302
1,390.	Don	Huneycutt	77 Flat Rock Fields Ln	Hendersonville	NC	28739
1,391.	Carl	Tulppo	121 Duck Savannah Drive	Holly Springs	NC	27540
1,392.	Ron	Barlow	14245 Cool Springs Rd.	Cleveland	NC	27013
1,393.	Greta Lee	Camp	Po Box 1045	Asheville	NC	28802
1,394.	Evelyn	Spell	3380 Stanworth Drive	Fayetteville	NC	28312
1,395.	Karen	Parker	5550 B And J Hosiery Mill St	Hickory	NC	28602-8632
1,396.	Ashley	Bush	170 Pete Fritts Rd	Lexington	NC	27292-2130
1,397.	Carol	Bishop	263 Pilgrims Ln	Burnsville	NC	28714-8042
1,398.	Laurie	O'Loughlin	4 Castlewood Lane	Pinehurst	NC	28374
1,399.	Karen	Waltman	517 Burge Mountain Rd	Hendersonville	NC	28792

1,400.	Clifford	Juleson	1300 Larchmont Place. Unit 807	Salisbury	NC	28144
1,401.	Jennifer	Cortez	319 N Flint St	Lincolnton	NC	28092-3503
1,402.	Chuck	Mosher	4009 Mendenhall Dr	Zebulon	NC	27597-9434
1,403.	Philana	Sampson	841 Chastain Ave	Concord	NC	28025
1,404.	Linda	Willis	1814 Charles Raper Jonas Hwy Apt. B	Mount Holly	NC	28120
1,405.	Perry	Cook	3323 Union Road	Gastonia	NC	28056
1,406.	Geoffrey	Tilford	100 Hidden Oaks Dr. #3B	Cary	NC	27513

October 15, 2021

Zaynab Nasif
North Carolina Division of Air Quality
217 W Jones Street
Raleigh, NC 27603

Via electronic mail

Dear Ms. Zaynab Nasif:

I am writing on behalf of the Appalachian Trail Conservancy (ATC) to express a number of concerns with North Carolina's Draft Regional Haze State Implementation Plan (SIP). Thank you for the opportunity to comment. After reviewing the SIP alongside the National Park Service's (NPS) consultation findings (attached), it is clear to us that if left unchanged, many of the same deficiencies identified by the NPS's formal consultation with the state will continue to impair the Appalachian Trail (A.T.) Experience, specifically of note through the several Class I areas along the Trail in North Carolina. These comments focus on how industrial air pollution, too much of which remains unregulated through this SIP update, negatively impact the Trail.

The Conservancy is the § 501(c)(3) nonprofit organization that organized the construction of and continues to lead, under a cooperative agreement with the NPS, the management of the Appalachian National Scenic Trail (ANST or "the Trail"), a unit of the National Park System. The Conservancy works closely with the 31 Appalachian Trail Maintaining Clubs, the NPS, the United States Forest Service, 14 state governments, and public and private partners. Our mission is to protect, manage, and advocate for the ANST, including maintaining the natural, cultural, and experiential resources of the Appalachian Trail, as we have done since our founding in 1925. The Trail is 2,193 miles long, surrounded by approximately 300,000 acres of government-protected land (the Corridor), and a vast visible and connected Appalachian Trail Landscape. ATC has extensive experience in conserving the natural, cultural, and experiential values of our public lands.

ATC works diligently with our partners across Western North Carolina to protect the iconic Appalachian Trail Landscape, including the Joyce Kilmer-Slickrock Wilderness in the Nantahala National Forest and Great Smoky Mountains National Park. We work with federal, state and private partners to ensure that when hikers traverse this landscape, they are immersed in a world-class natural environment, including the iconic viewsheds for which the Southern Appalachian range is known. However, ATC's mission is not constrained to land protection; negative environmental conditions, such as haze, can pose just as perverse a threat to the A.T. Experience and the Congressionally protected values of the Trail as incompatible development. If the

protected scenic resources are not visible due to haze, if the natural resources—such as animal and plant health—are degraded due to air pollution, or if the recreational experience is impaired due to poor air quality impacting the health of visitors, then the Congressionally protected values of the Trail are not being treated appropriately under federal law.

While we are pleased that regional air quality has improved somewhat in the past decade, this improvement is not a sign that these efforts should be slowed. Rather, the repairing of our air quality serves as evidence that continued updates are possible and will be successful. The public health implications of failing to correct the deficiencies identified by NPS in its consultation on the draft SIP highlight several areas of improvement before the SIP is finalized. A.T. users and nearby communities, many of which are low-income and/or environmental justice communities, depend on clean air for their most basic wellbeing. Day hikers may be able to selectively visit the Trail on clear days, but long-distance hikers and nearby communities have no choice but to breathe that air even on the days that continue to make places like the Smokies among the national parks with the worst air pollution. Prolonged exposure to poor air conditions can cause lasting health risk. Of course, the flora and fauna negatively impacted by poor air quality have little ability to relocate or avoid being outside when humans are forced indoors. Indeed, the spruce forests crowning the balds of Southern Appalachia, which host tremendous biodiversity, are among the plant communities most affected by acid rain and other air pollution effects that have, to an extent, been successfully reduced by the Clean Air Act and its amendments. As these natural resources attempt to cope with the compounding impacts of climate change, their health is also worthy of North Carolina's consideration. Jeopardized ecosystems impair everything from water quality to the recreational experience of hikers, hunters, and other users of the outdoors.

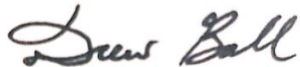
The technicalities of which industrial sources are regulated, which pollutants are addressed, and what limits or technology solutions are imposed under the Haze Rule are largely beyond the scope of ATC's expertise. However, we have a long-standing cooperative relationship with the NPS and have often relied on its technical competency in areas such as air quality monitoring. This is no exception. It is clear from the consultation conducted in May 2021 that the NPS has serious doubts about this current SIP's ability to live up to its potential—and to meet the demands of the moment. We share the NPS' concerns with the draft SIP's omission of nitrogen oxides, with the exclusion of many industrial facilities that threaten air quality in Class 1 areas in the Southeast, and with the underlying thresholds used in the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) model to trigger source selection.

We are concerned that without more robust regulation, this SIP will fail to uphold the critical protections established for Class 1 areas by the 1977 Clean Air Act amendments. That potential failure would represent a lost opportunity to improve the natural, scenic, and historic resources of the United States, as conserved in part by the ANST. Failure to further improve North Carolina's air quality when possible, negatively and directly impacts the protected trust resources of the

ANST, frustrating the goals and needs of our cooperating managers partners, the ANST's visitors, and its dedicated volunteers. The people primarily impacted by insufficient air quality standards are North Carolinians, although North Carolina's SIP will have impacts regionally and beyond.

In short, we remain concerned that the State of North Carolina may fail to take adequate steps to fulfill the mission of putting Class 1 protected areas in the Southeast on a path of continued improvement, as the Clean Air Act requires. The Appalachian National Scenic Trail is a natural and cultural touchstone and a treasured resource for the state, region, and nation. Protecting the quality of the air within and along the ANST is a fundamental concern of our organization. We hope you will take these concerns into consideration by including nitrogen oxides and broadening source selection criteria in the SIP. Thank you again for the opportunity to offer input during this planning process.

Sincerely,

A handwritten signature in cursive script that reads "Drew Ball".

Drew Ball
Southern Regional Director
Appalachian Trail Conservancy



5/25/2021

NPS Formal Consultation Call with North Carolina DEQ for Regional Haze SIP Development

Attendees:

- National Park Service
 - Denesia Cheek, Southeast Regional Office – Atlanta, GA
 - Kirsten King, Air Resources Division (ARD) – Denver, CO
 - Debbie Miller, ARD – Denver, CO
 - Melanie Peters, ARD – Denver, CO
 - Jim Renfro, Great Smoky Mountains NP
 - Don Shepherd, ARD – Denver, CO
 - Andrea Stacy, ARD – Denver, CO
- North Carolina DEP
 - Michael Abraczinskas
 - Joshua Bartlett
 - Tammy Manning
 - Michael Pjetraj
 - Randy Strait
 - Elliot Tardif
 - Heather Wylie
- FWS
 - Tim Allen
 - Jaron Ming
- USFS
 - Melanie Pitrolo

NPS photos from left to right: Great Smoky Mountains NP, Denali NP, Yellowstone NP, Grand Canyon NP

Agenda

- Welcome & Introductions
- NPS Regional Haze Background
- NPS Areas in North Carolina
- Great Smoky Mountains National Park
- NPS Concerns with VISTAS Approaches to RH & Feedback for North Carolina
 - Exclusion of NO_x/Nitrate
 - Source Selection
 - Visibility Benefit and URP Considerations
- Next-Steps

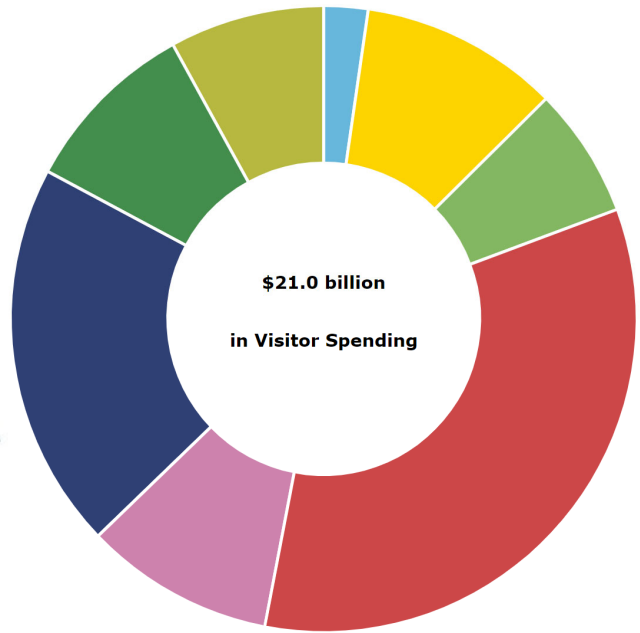


We welcome discussion at any time during this presentation. Please feel free to ask questions or add information along the way.

NPS Photo, Great Smoky Mountains NP

By the Numbers

- 423 national park units
- 328 million park visitors
- \$21.0 billion spent in local gateway regions



Nationally in **2019** (a 2020 report was not completed due to the pandemic)

328 million park visitors spent an estimated \$21 billion in local gateway regions while visiting National Park Service lands across the country.

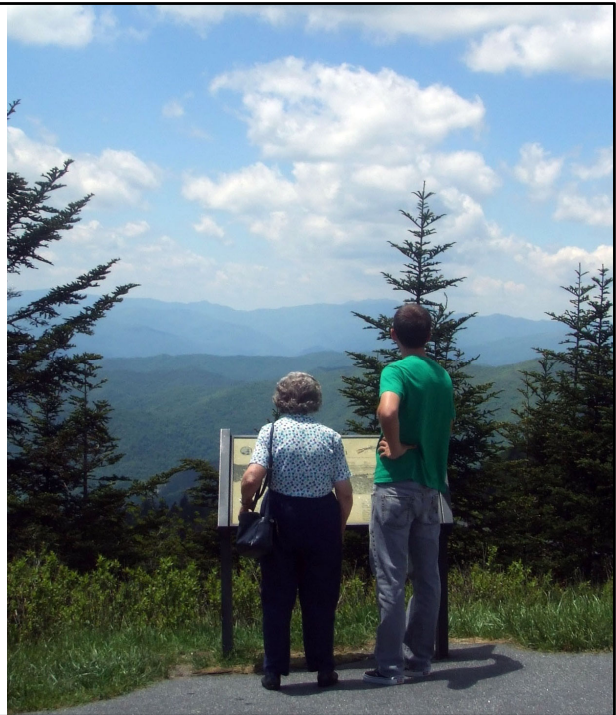
These expenditures supported a total of

- 341 thousand jobs,
- \$14.1 billion in labor income,
- \$24.3 billion in value added, and
- \$41.7 billion in economic output in the national economy.

<https://www.nps.gov/subjects/socialscience/vse.htm>

By the Numbers

- **48** Class I areas
- In **24** states
- **90%** of visitors surveyed say that scenic views are **extremely** to **very** important
- **100%** of visitors surveyed rate clean air in the **top 5** attributes to protect in national parks



List of Class I areas: <https://www.nps.gov/subjects/air/npsclass1.htm>

States with at least one Class I area:

AK, AZ, CA, CO, FL, HI, ID, KY, ME, MI, MN, MT, NC, ND, NM, OR, SD, TN, TX, UT, VA, VI, WA, WY

Statistics citation:

Kulesza C and Others. 2013. National Park Service visitor values & perceptions of clean air, scenic views, & dark night skies; 1988–2011. Natural Resource Report. NPS/NRSS/ARD/NRR—2013/622. National Park Service. Fort Collins, Colorado

NPS photo of Great Smoky Mountains NP, NC & TN



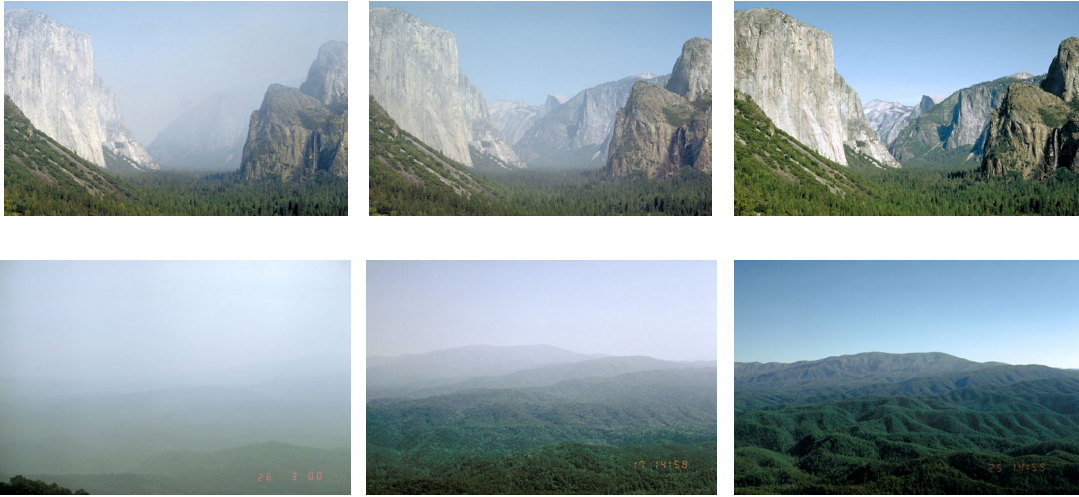
The NPS has an affirmative legal responsibility to protect clean air in national parks.

- 1916 NPS Organic Act: created the agency with the mandate to conserve the scenery, natural and cultural resources, and other values of parks in a way that will leave them unimpaired for the enjoyment of future generations. This statutory responsibility to leave National Park Service units “unimpaired,” requires us to protect all National Park Service units from the harmful effects of air pollution.
- In the 1970 Clean Air Act: authorized the development of comprehensive federal and state regulations to limit emissions from both stationary (industrial) sources and mobile sources. The Act also requires the Environmental Protection Agency to set air quality standards.
- 1977 Clean Air Act Amendments: these amendments to the Clean Air Act provide a framework for federal land managers such as the National Park Service to have a special role in decisions related to new sources of air pollution, and other pollution control programs to protect visibility, or how well you can see distant views. The Act established a national goal to prevent future and remedy existing visibility impairment in national parks larger than 6,000 acres and national wilderness areas larger than 5,000 acres that were in existence when the amendments were enacted. (Class I areas)
- 1990 Clean Air Act Amendments: created regulatory programs to address acid rain and expanded the visibility protection and toxic air pollution programs. The acid rain regulations began a series of regional emissions reductions from electric generating facilities and industrial sources that have substantially reduced air pollutant emissions.

NPS photo of Washington DC: <https://npgallery.nps.gov/AirWebCams/wash>

Visibility goal:

Restore natural conditions by 2064

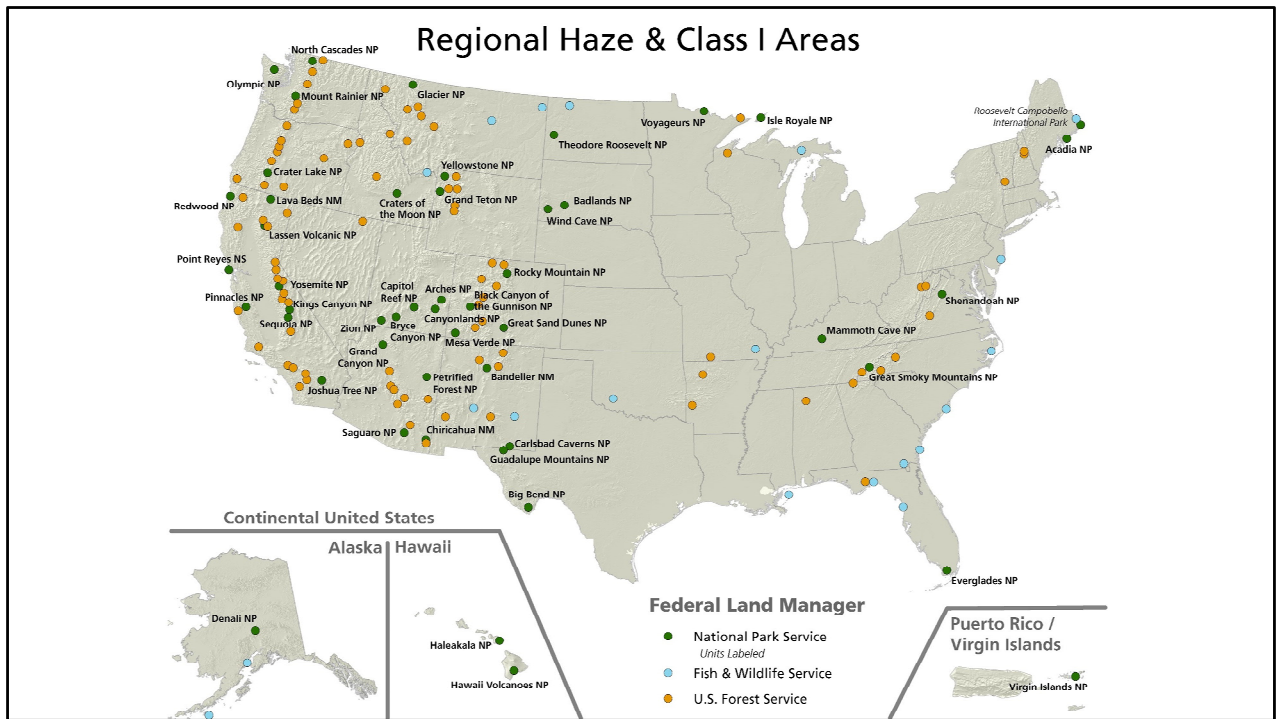


Yosemite NP, California and Great Smoky Mountains NP, Tennessee and North Carolina

Left to right images illustrate hazy to clear conditions.

Haze obscures the color and detail in distant features.

NPS photos



As you know, the NPS is one of three Federal Land Managers (FLMs) with responsibility for the 156 Class I areas nationwide. The NPS manages 48 Class I areas including Great Smoky Mountains National Park in North Carolina & Tennessee.

NPS map of Class I areas, 2020



Units managed by the National Park Service in North Carolina

1. [Appalachian](#) National Scenic Trail; Maine to Georgia, CT,GA,MA,MD,ME,NC,NH,NJ,NY,PA,TN,VA,VT,WV
 2. [Blue Ridge](#) Parkway; Blue Ridge Mountains of Virginia and North Carolina, NC,VA
 3. [Cape Hatteras](#) National Seashore; Nags Head, Buxton, Ocracoke, NC
 4. [Cape Lookout](#) National Seashore; Harkers Island, NC
 5. [Carl Sandburg Home](#) National Historic Site; Flat Rock, NC
 6. [Fort Raleigh](#) National Historic Site; Manteo, NC
 7. [Great Smoky Mountains](#) National Park; the states of NC,TN
 8. [Guilford Courthouse](#) National Military Park; Greensboro, NC
 9. [Moores Creek](#) National Battlefield; Currie, NC
 10. [Wright Brothers](#) National Memorial; Kill Devil Hills, NC
- [Overmountain Victory](#) National Historic Trail; NC,SC,TN,VA
 - [Trail Of Tears](#) National Historic Trail; AL,AR,GA,IL,KY,MO,NC,OK,TN

2019 [Visitor Spending Effects - Economic Contributions of National Park Visitor Spending - Social Science \(U.S. National Park Service\) \(nps.gov\)](#)

NPS photo of Cades Cove Visitor Center in Great Smoky Mountains NP, May 2013 by Warren Bielenberg.



Great Smoky Mountains National Park

Great Smoky Mountains National Park Ridge straddles the border between North Carolina and Tennessee. With over 500,000 acres, it is world renowned for its diversity of plant and animal life, the beauty of its ancient mountains, and the quality of its remnants of Southern Appalachian mountain culture, this is America's most visited national park, with about 13 million visits annually, providing nearly \$1 billion in the local economy. It's one of the most biologically diverse national parks in the NP system (with approximately 20,000 known species). The park is a UNESCO World Heritage Site and an International Biosphere Reserve.

The park's enabling legislation from 1926 states the park was established for the enjoyment of the people.

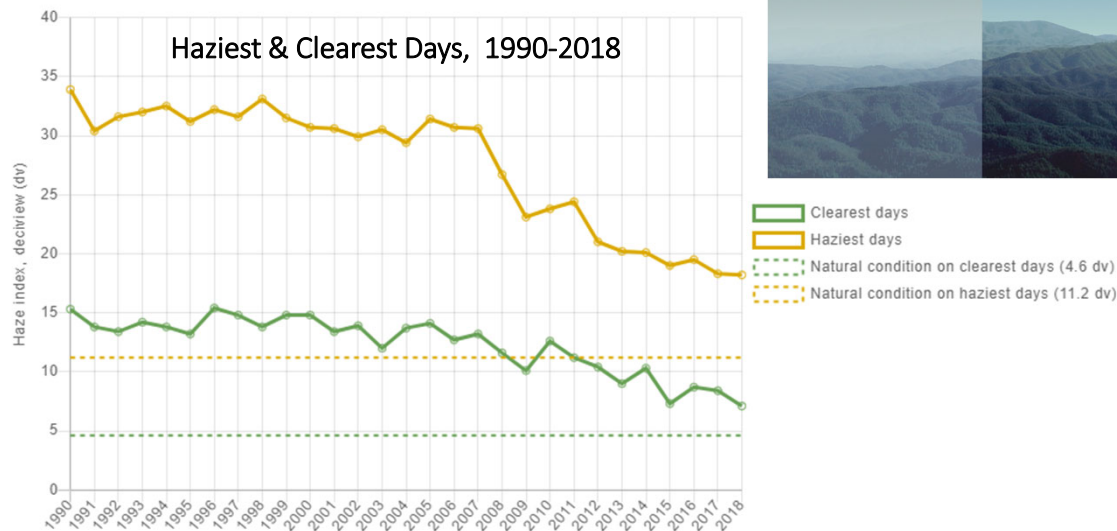
The park's significance is rooted in its scenery. The park is the finest example of the ruggedness, magnitude, height, and scenic grandeur of the southern Appalachian Mountains, known for its historic landscapes, panoramic mountain vistas and the changing of the seasons.

Air quality is the number one *Fundamental Resource Value* listed in the park's Foundation Document. The Foundation Document identifies the park's purpose, significance, fundamental resources and values. Air quality contributes to the ecological health of the park's flora and fauna and is critical to maintaining quality visitor experiences.

NPS photo of a summer view near the Boulevard Trail in Great Smoky Mountains NP, June 2016.

Great Smoky Mountains National Park

The Views are Getting Clearer!



There is a long history of visibility monitoring at Great Smoky Mountains National Park (over 40 years!)

Monitoring data show significant improvement on both the haziest and clearest days since the late 1990's. The regional haze metric is now based on most-impaired days rather than haziest but, it is still interesting to see the range of visibility conditions experienced by park visitors and monitored in the park.

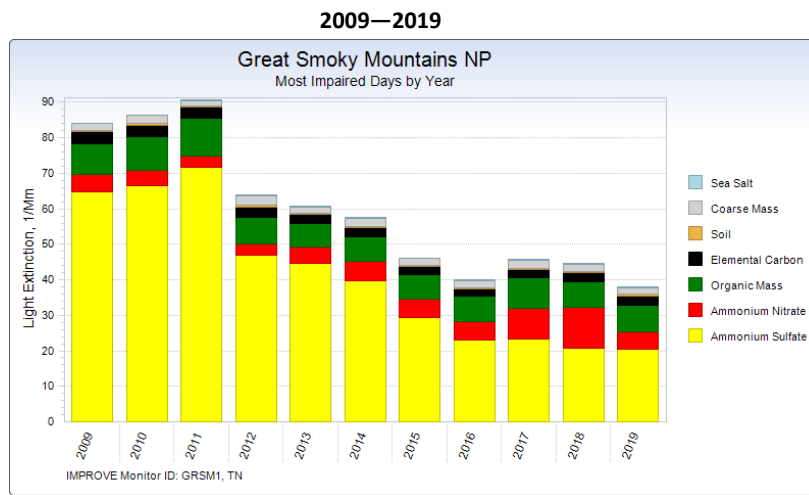
Progress has been made since the first Regional Haze planning phase, and we want to continue to make progress over this second planning phase as well.

Long term visibility trend graph from:

[https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=trends&parkCode=GRSM¶mCode=Visibility&startYr=1990&endYr=2018&monitoringSite=GRSM1%20\(IMPROVE\)&timePeriod=Long-term](https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=trends&parkCode=GRSM¶mCode=Visibility&startYr=1990&endYr=2018&monitoringSite=GRSM1%20(IMPROVE)&timePeriod=Long-term)

Great Smoky Mountains National Park

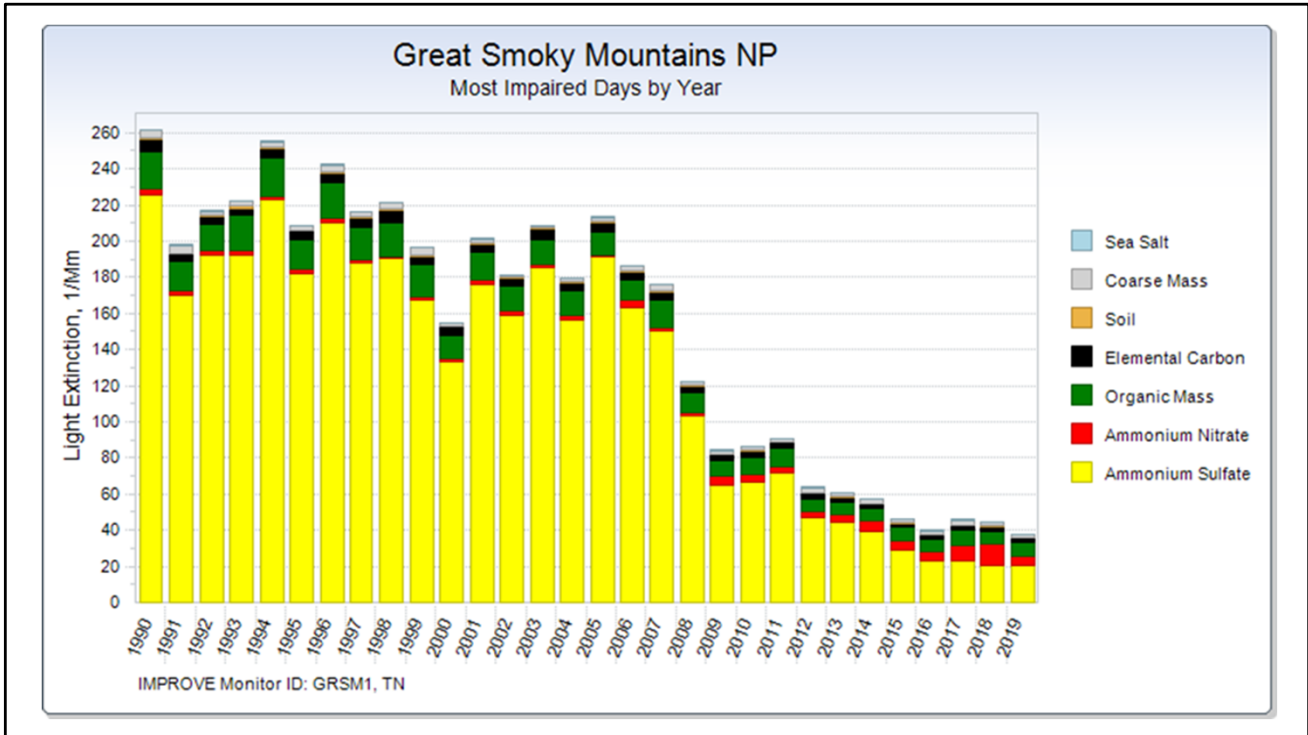
As Impairment Drops Composition Changes



Annual contributions to light extinction by particle mass type on the most-impaired days from 2009 through 2019. The relative and absolute contribution of ammonium nitrate to light extinction on the most-impaired days generally increased during this period. (<http://vista.cira.colostate.edu/improve/aqrv-summaries/>)

This annual extinction bar graph shows that over the past last 11 years, as overall impairment improves (decreases), the chemical composition is changing on the 20% most-impaired days. Sulfate continues to drop, but nitrate is increasing both in the absolute and relative contribution to light extinction on the 20% most-impaired days.

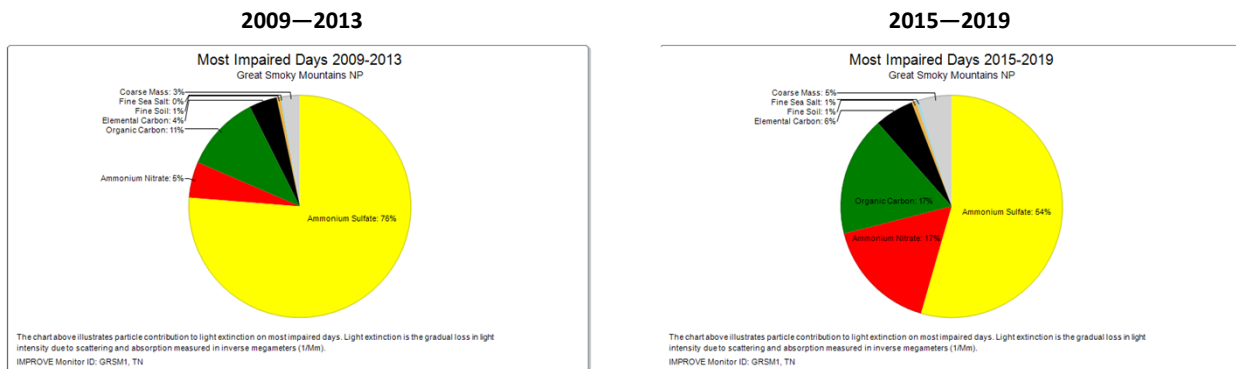
Most-impaired days annual light extinction composition stacked bar graph from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>



Looking at annual light extinction on most-impaired days since 1990 highlights the massive reductions in ammonium sulfate as well as the recent increase in the importance of ammonium nitrate on most-impaired days.

Most-impaired days annual light extinction composition stacked bar graph from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>

Nitrate is Increasingly Important



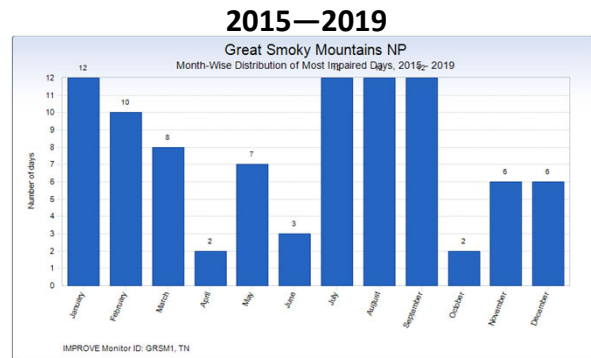
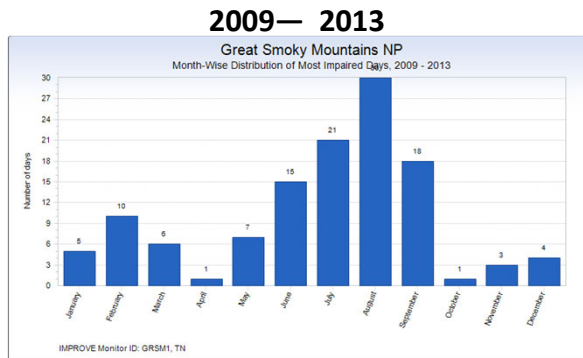
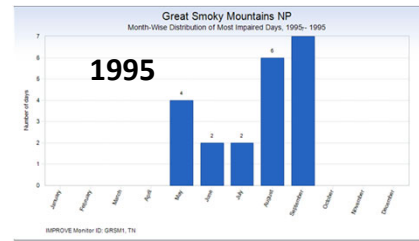
Percent contributions to light extinction by particle mass type on the most-impaired days during two five-year periods, 2009-2013 (left) and 2015-2019 (right). The contribution of ammonium nitrate to light extinction increased from 5% during 2009-2013 to 17% during 2015-2019. (<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>)

The relative or percent contribution of ammonium nitrate to light extinction has significantly increased over the past 10 years. During the five-year period around the 2011 base year, ammonium nitrate accounted for less than 5% of total light extinction. In the most recent five-year period (2015-2019) that has increased to 17%.

Most-impaired days haze composition pie charts from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>

Great Smoky Mountains National Park

Seasonal Changes for Impairment



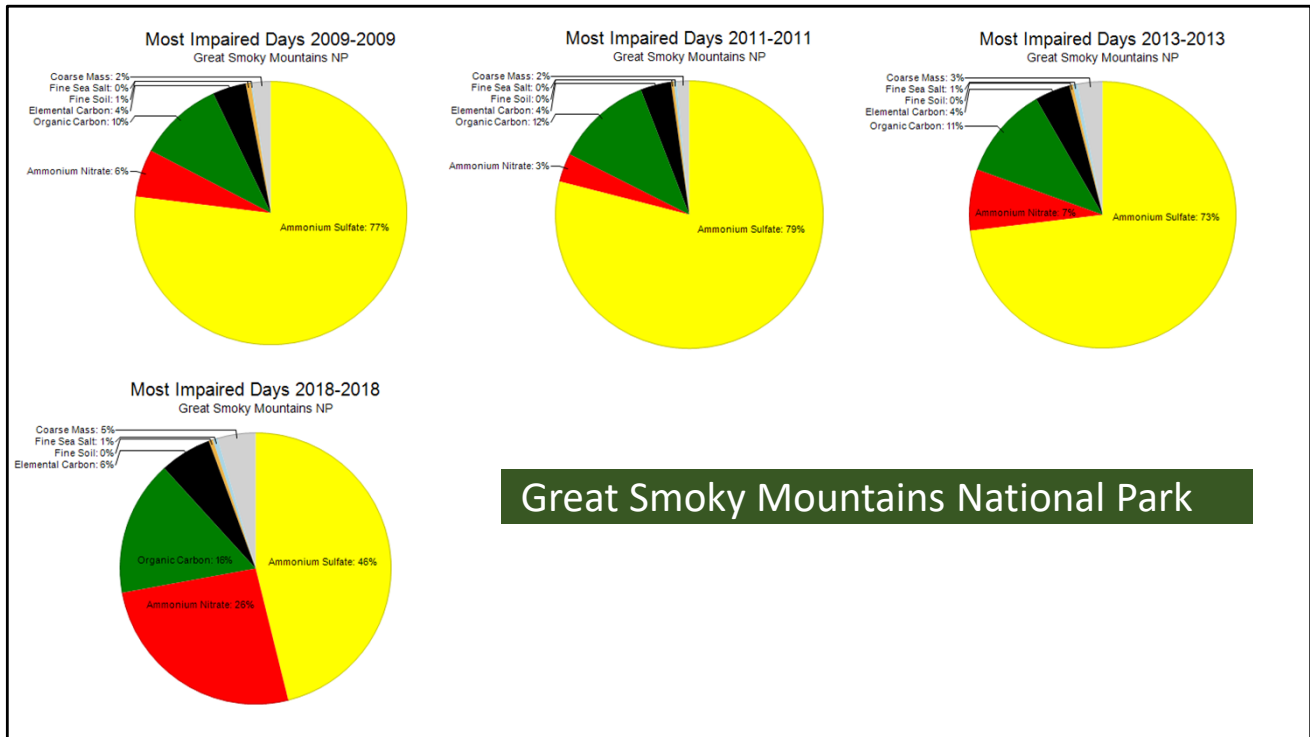
Monthly distribution of the most-impaired days during two five-year periods, 2009-2013 (left) and 2015-2019 (right). The number of most-impaired days occurring in the cooler months (January-April and October-December) was higher during 2015-2019 (46 days) than in 2009-2013 (30 days). (<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>). Note in 1995, most-impaired days only occurred May-Sep.

Additionally, the annual distribution of when the most-impaired days occur has changed.

Historically the most-impaired days were concentrated during the summer months. For example, in 1995 all of the 20% most-impaired days occurred between May and September. As recently as 2009-2013 (the five-year period surrounding the 2011 base year used for VISTAS modelling) the most-impaired days were still concentrated during the warmer months (June-September). However, in the most recent five-year period, the 20% most-impaired days are shown to occur anytime of year and frequently include days in the winter months.

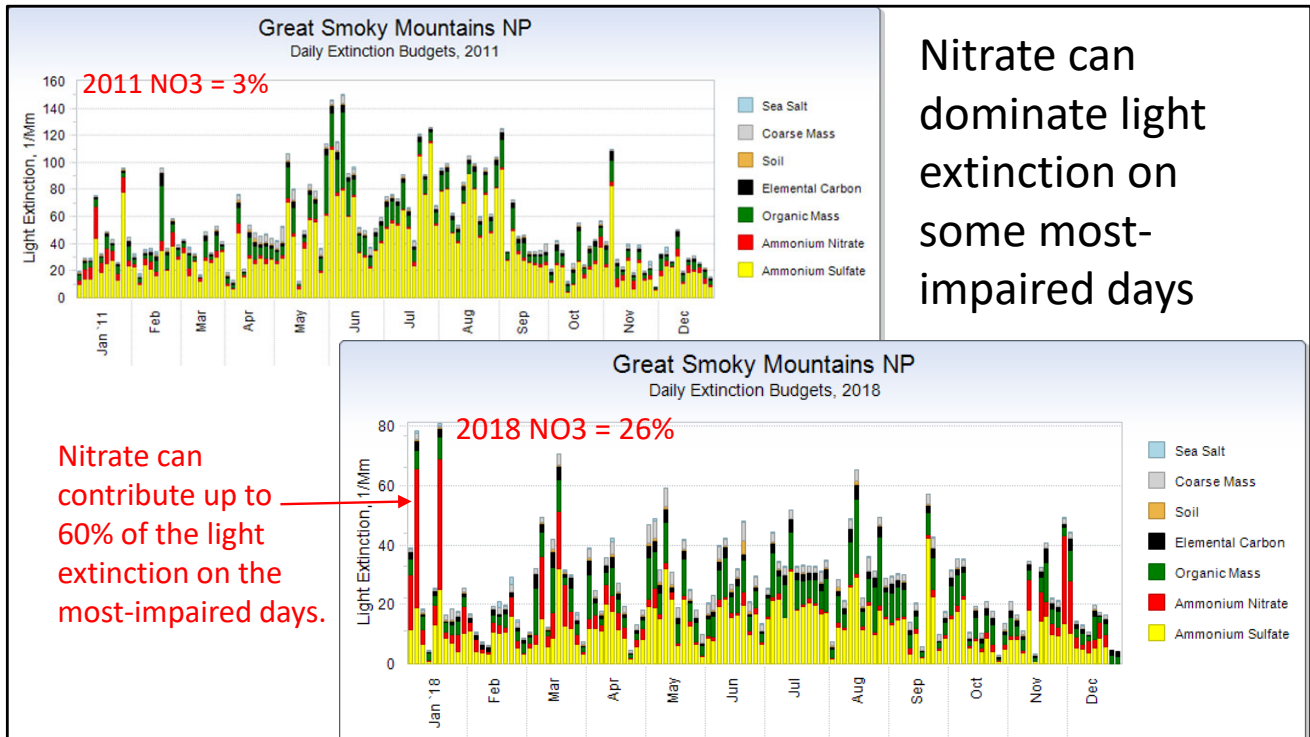
This is key to our comments regarding North Carolina's reliance on an outdated base year in their source selection modeling analysis, as it is not likely to capture high nitrate days.

Month-wise distribution of most-impaired days bar graphs from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>



Annual changes in the relative contribution of particles to light extinction on the 20% most-impaired days show the reduction in sulfate and the increase in nitrate. Nitrate is now the 2nd largest contributor to the most-impaired days at GRSM and can be the primary pollutant on some of the most-impaired days (up to 60% on some days). 2011 monitoring data (the base modeling year) is representative of monitoring data and conditions from 1990-2011 but is not representative of current data (and likely future days in 2028) as nitrate is playing a much greater role in light extinction on the most-impaired days throughout the entire year, not just the warmer months.

Most-impaired days haze composition pie charts from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>

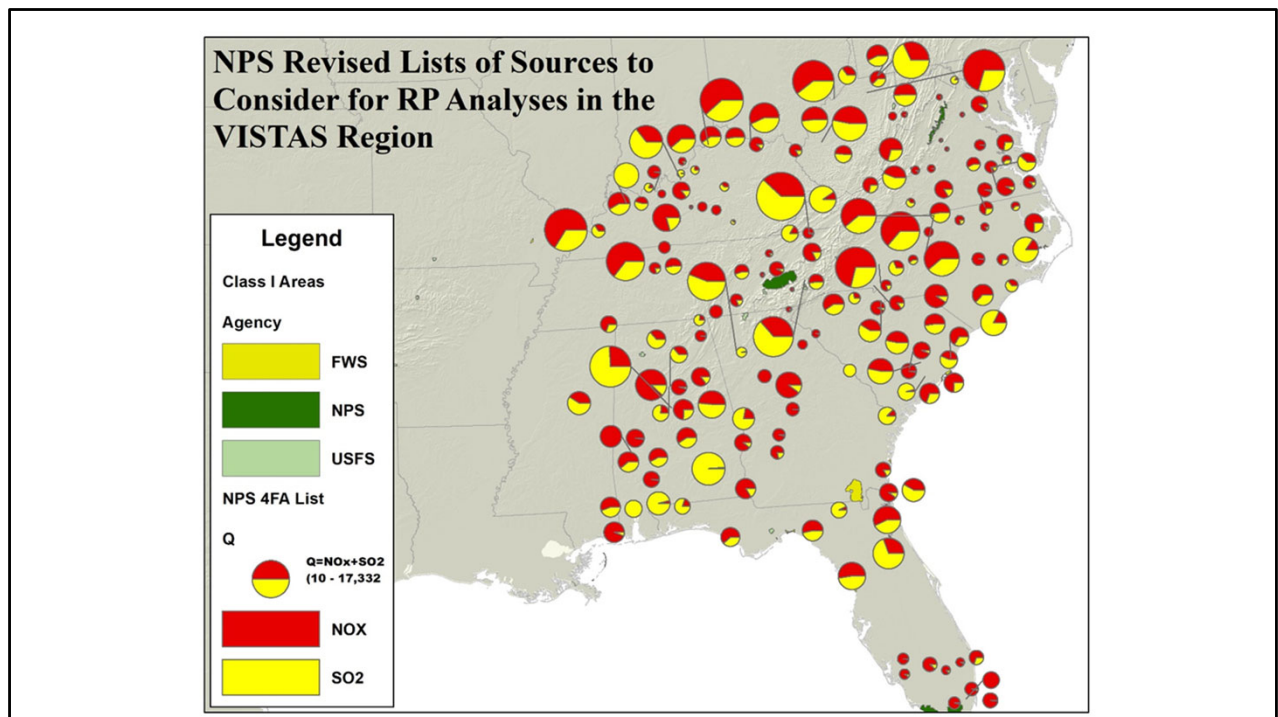


Individual sample days in 2011 were rarely dominated by extinction from ammonium nitrate. However, there were several days in 2018 when light extinction from ammonium nitrate was the single biggest contributor to haze.

Sample day light extinction composition stacked bar graph from:
<http://vista.cira.colostate.edu/Improve/pm-and-haze-composition/>

Exclusion of NO_x/Nitrate

- The VISTAS analyses justifying exclusion of NO_x do not adequately account for current conditions on the 20% most-impaired days.
- As SO₂ emissions decline and the seasonality of most-impaired days shifts, Nitrate is increasingly important in many VISTAS Class I areas.
- States should evaluate NO_x and SO₂ control opportunities in this planning period.

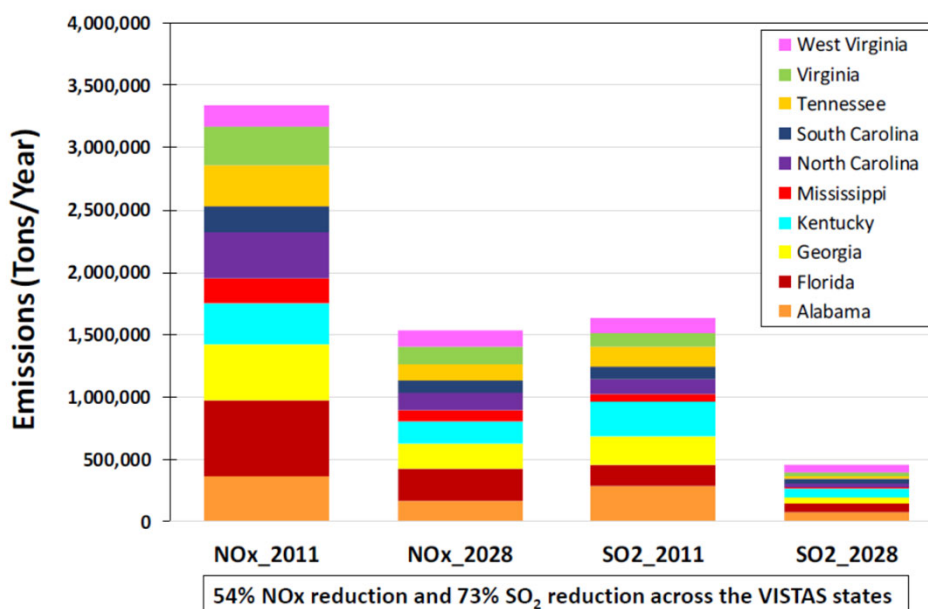


This map shows the most recent emissions inventory data (2020-CAMD/2017-NEI) for VISTAS sources identified by the earlier (2020) NPS Q/d methodology. Although we are now recommending VISTAS states consider alternate approaches to source selection using the VISTAS EWRT*Q/d results, this map illustrates the current distribution and scale of NO_x and SO₂ stationary sources in the region.

For North Carolina, we observe that the point source emissions are relatively high and predominantly NO_x.

NPS produced map, April 2021

VISTAS States Emissions: 2011 vs. 2028



19

VISTAS emissions projections for 2028 show that there will be 1.5 million tons of NO_x (3 times the amount of SO₂) at the end of this planning period. Increasing trends in nitrate haze on most-impaired days will likely continue. We encourage North Carolina to expand focus from SO₂ and explore opportunities to further reduce NO_x emissions in this planning period.

VISTAS Graphic (Slide 9 from 8/4/2020 EPA, FLM, RPO Briefing presentation)

Exclusion of NO_x/Nitrate

- Ammonium nitrate is a significant anthropogenic haze causing pollutant.
- Over the past 10 years the importance of ammonium nitrate on the 20% most-impaired days has increased at Great Smoky Mountains NP.
- North Carolina rationale for excluding NO_x emissions from reasonable progress is based on an outdated modeling base year and inaccurate assumptions about the current and future distribution of most-impaired days.
- NPS recommends that North Carolina abandon this rationale and consider NO_x emission reduction opportunities in this round of RH SIP development.
- Reducing NO_x emissions would have additional regional co-benefits for ozone and acid deposition.

Ammonium nitrate from NO_x emissions is a significant anthropogenic haze causing pollutant. Over the past 10-years the importance of ammonium nitrate on the 20% most-impaired days has increased for many Class I areas in the VISTAS region, including at Great Smoky Mountains NP. As SO₂ emissions decline and the seasonality of most-impaired days shifts, NO_x emissions are increasingly important for many VISTAS Class I areas.

We find that the North Carolina rationale for excluding NO_x emissions from reasonable progress four factor analyses is based on an outdated modeling base year (2011) and inaccurate modeling assumptions about the current and future distribution of most-impaired days.

Based on discussion during the meeting we would like to clarify that we agree the modelling methods by North Carolina and VISTAS follow EPA guidance and are technically correct.

The issue is that the importance of ammonium nitrate and the distribution of most-impaired days has changed significantly since the 2011 base year. As a result, 2028 projections based on the 2011 most-impaired days (which were ammonium sulfate dominated and occurred during the summer) miss the importance of nitrogen oxide emissions and ammonium nitrate extinction during the cooler months of the year that are now the most-impaired.

NPS recommends that North Carolina acknowledge the relevance of recent monitoring data and consider NO_x emission reduction opportunities for additional facilities to address regional haze during this planning period. Reducing NO_x emissions would have additional regional co-benefits for ozone and nitrogen deposition.


Source Selection

- The *individual facility percent-of-total-impact* metrics are arbitrarily high and inherently less protective of the more-impacted Class I areas in the VISTAS region.
- The threshold for selecting an individual facility is **80 times** higher in the most-impacted Class I area than in the least-impacted Class I area in the VISTAS region.

Our source selection concern stems from the choice to select individual facilities contributing 1% or more to the total of visibility impairing pollutants at a Class I area.

Identifying sources based on this metric biases the results against the more visually impacted Class I areas. In fact, source emissions would have to be **80 times** larger to identify a source for analysis in the most visually impaired VISTAS Class I area (Dolly Sods Wilderness Area) compared to the least visually impaired Class I area (Everglades NP). The threshold to identify a source affecting Great Smoky Mountains NP is **19 times** higher than was needed to identify a source affecting Everglades NP in Florida.

Source Selection

- Underlying EWRT*Q/d analysis 
- Updated NPS lists of facilities
 - 80% of total
 - Absolute Value Threshold

We acknowledge that an EWRT*Q/d approach is more robust than a simple Q/d approach because it also considers extinction and meteorology on the 20%. Accordingly, we updated our approach using the VISTAS EWRT*Q/d results and evaluated two alternative threshold metrics that could be used in lieu of the VISTAS individual facility percent-of-total-impact thresholds.

- **Clarification Note:** While we agree with using AOI approaches as opposed to a simple Q/d, this is not a wholesale endorsement of the VISTAS methods. We still have technical objections to the reliance on an outdated base year that underpins the AOI & CAMx analyses. Because of this, the outdated MIDs used in the analysis likely underestimate the role of NO_x and assumes this will be the case into the future—IMPROVE data suggest otherwise. This affects the facility selection process by failing to account for the role of ammonium nitrate on the recent MID and biases the analysis against selecting NO_x sources. Adjusting the selection thresholds does not address this issue. Regardless, we used the VISTAS EWRT*Q/d in our revised source screening analyses.

Our first approach applied a threshold that captures 80% of the total Class I Area impact (e.g., 80% of the TCI) for sulfate & nitrate, as was recommended in the 2016 draft regional haze guidance. This produced a list of all the facilities that contribute up to 80% of the TCI in a given NPS VISTAS Class I area. We are calling these results the “80% cut-off results.”

The second alternative approach applied an absolute value threshold of $[(EWRT(SO_4) * Q/d(SO_2)) + (EWRT(NO_3) * Q/d(NO_x))] = 0.0067$ for an individual facility impact. This was the lowest absolute value of EWRT*Q/d for sources Florida selected for 4FA at Everglades NP—a Mosaic fertilizer plant. We are calling these results the “absolute value threshold results.” Because Everglades NP is the least-impacted Class I Area in the VISTAS region (based on TCI), this likely represents the lowest absolute value threshold used to select a facility for 4FA within the VISTAS region.

Based on calculated efficiency metrics, we recommend the absolute value threshold makes the most sense for Great Smoky Mountains NP.

Source Selection

- New NPS list of sources for North Carolina:

	FACILITY NAME	NPS Class I Areas Affected
1	Blue Ridge Paper Products - Canton Mill	GRSM
2	Duke Energy Carolinas, LLC - Belews Creek Steam Station	GRSM, SHEN
3	Duke Energy Carolinas, LLC - Cliffside Steam Station	GRSM
4	Duke Energy Carolinas, LLC - Marshall Steam Station	GRSM, MACA, SHEN
5	Duke Energy Progress, LLC - Mayo Electric Generating Plant	SHEN
6	Duke Energy Progress, LLC - Roxboro Steam Electric Plant	GRSM, SHEN

- Only one of these was selected by North Carolina.
 - Blue Ridge Paper Products, Canton Mill

Using the absolute value threshold approach to analyzing VISTAS source selection data identifies 5 Duke Energy facilities in addition to Blue Ridge Paper Products (already identified by North Carolina) as affecting visibility at Great Smoky Mountains NP and other NPS Class I areas.

Acronyms:

- GRSM, Great Smoky Mountains NP (North Carolina & Tennessee)
- SHEN, Shenandoah NP (Virginia)
- MACA, Mammoth Cave NP (Kentucky)

Note, our analysis only considered NPS Class I areas.

Blue Ridge Paper

- Four-factor analysis demonstrates that this source is well controlled for SO₂
 - NPS agrees with the NC DEQ determination that no new SO₂ emission controls are warranted at the Blue Ridge Paper facility during this round of SIP development.
- North Carolina did not require a four-factor analysis for NO_x emissions from Blue Ridge Paper.
- NPS recommends that North Carolina undertake or require a four-factor analysis of NO_x emission reduction opportunities in this round.
- Similar pulp and paper facilities across the country are evaluating NO_x emissions and finding technically feasible and cost-effective emission reduction opportunities.

Blue Ridge Paper is the only source evaluated by North Carolina that is relevant to a NPS Class I area (Great Smoky Mountains NP).

NPS ARD staff have reviewed the four-factor analysis for Blue Ridge Paper Products and note the findings above.

The Domtar Paper and PCS Phosphate facilities primarily affect non-NPS class I areas. As such, we have not provided a detailed four-factor analysis review at this time.

North Carolina Draft SIP Feedback

A closer look at Duke Energy sources

Facility Name	Unit ID	Avg. SO ₂ (tons)	Avg. SO ₂ Rate (lb/MMBtu)	Avg. SO ₂ Efficiency	SO ₂ Control	Avg. NO _x (tons)	Avg. NO _x Rate (lb/MMBtu)	Avg. NO _x Efficiency	NOx Control
Belews Creek	1	1,583	0.094	92%	WLSS	3,410	0.202	80%	SCR
Belews Creek	2	1,538	0.100	92%	WLSS	2,393	0.155	84%	SCR
Belews Creek	Total	3,121				5,802			
Cliffside	5	463	0.064	96%	WLS	1,040	0.143	70%	SCR
Cliffside	6	767	0.037	*	WLS	1,161	0.056	*	SCR
Cliffside	Total	1,230				2,201			
Marshall	1	579	0.125	91%	WLS	1,189	0.258	39%	SNCR
Marshall	2	629	0.132	91%	WLS	1,248	0.262	35%	SNCR
Marshall	3	1,442	0.113	92%	WLS	1,678	0.131	69%	SCR
Marshall	4	1,212	0.081	94%	WLS	3,742	0.249	38%	SNCR
Marshall	Total	3,862				7,857			
Mayo	1A	626	0.146	86%	WLS	647	0.151	65%	SCR
Mayo	1B	509	0.149	86%	WLS	499	0.146	63%	SCR
Mayo	Total	1,134				1,146			
Roxboro	1	308	0.085	94%	WLS	492	0.136	74%	SCR
Roxboro	2	854	0.109	89%	WLS	1,195	0.152	72%	SCR
Roxboro	3A	537	0.109	92%	WLSS	783	0.158	83%	SCR
Roxboro	3B	545	0.108	93%	WLSS	807	0.160	83%	SCR
Roxboro	4A	645	0.116	89%	WLSS	761	0.137	76%	SCR
Roxboro	4B	572	0.121	88%	WLSS	661	0.139	75%	SCR
Roxboro	Total	3,461				4,700			

This spreadsheet that shows the SO₂ and NO_x emissions, controls, and control efficiencies for the five additional North Carolina sources, all power plants (consisting of 16 active EGUs) that NPS identified using VISTAS source selection data (EWRT*Q/d) and the Florida absolute value threshold.

We used annual CAM data dating back to 1980 to estimate uncontrolled emissions and compared those to the most-recent three years of emissions (2018-2020 CAMD) to estimate control efficiency.

Additional Analysis Recommendations

SO₂

- All but five EGUs are achieving > 90% control for SO₂, and all are below the 0.2 lb/MMBtu MATS off-ramp. No additional analyses for SO₂ are needed.

NO_x

- Our estimates reveal that all but Cliffside Unit #6 have NO_x controls that achieve < 90% control and are not effectively-controlled.
- NPS recommends that North Carolina confirm these efficiency estimates and require four factor analyses to evaluate opportunities to improve NO_x controls for all sources achieving < 90% control efficiency.
- In particular, we recommend that North Carolina explore the technical feasibility and costs associated with upgrading NO_x emission controls from SNCR to SCR at Duke Energy's Marshall Station.

NPS recommends that additional analyses for NO_x emission reduction opportunities for the point sources identified are warranted and would improve North Carolina's Round 2 Regional Haze SIP. We note that some of these facilities affect several NPS Class I areas. For instance, Duke Energy's Marshall station is affecting three NPS Class I areas (Great Smoky Mountains, Shenandoah, and Mammoth Cave NPs). This specific facility is the least effectively controlled with SNCR NO_x controls operating at 35-39% control efficiency.

Clarification Note: As discussed during our call, we are not suggesting that VISTAS should revise or redo their modeling analyses at this time. We recognize the timing considerations and the approval deadlines the states are subject to. We also appreciate that the AOI or Q/d analyses are not more robust than photochemical modeling. *We are suggesting* that given the identified shortcomings in the VISTAS analyses, the states should rely on additional information, including more recent IMPROVE data, to make their source selection and reasonable progress determinations for individual facilities. We recommend that VISTAS states consider alternate screening thresholds to select sources. Specifically, we recommend that North Carolina evaluate whether NO_x controls are reasonable using the four statutory factors identified in the CAA for the six sources identified by the NPS. In our view, additional CAMx PSAT modeling is not necessary to make these individual facility decisions, as the degree of visibility improvement is not one of the four statutory factors congress intended regulatory authorities to consider when making reasonable progress determinations. This recognizes the cumulative nature of visibility impairment and the fact that no one source is solely responsible for impairment, but that it is generated by many sources over a large geographic area.

Finally, we reiterate that NO_x reductions would have additional environmental benefits for Great Smoky Mountains NP, including reductions in pollutant deposition. As noted in the guidance, while "the CAA does not require states to consider air deposition impacts, including effects on water, soils, and vegetation, when determining reasonable progress," states are not prohibited from considering such benefits in their determinations. As environmental leaders in the southeast region, we urge North Carolina to consider additional reductions in this round of regional haze planning, which will have added benefits in the Class I areas.

VISTAS Approach Concerns

Visibility Benefit & URP Considerations

- Emission control decisions should be based upon the four factors identified in the Clean Air Act and not introduce an unintended fifth visibility factor.
- 2028 projections below the URP glidepath do not represent a “safe harbor” for avoiding otherwise reasonable emission controls.

North Carolina Draft SIP Feedback

- North Carolina used this rationale for not implementing new emission controls at Domtar Paper and PCS Phosphate despite finding cost effective SO₂ control opportunities for Domtar Paper.

National Park Service RHR - Round 2



- Thank you for meeting with us!
- Please share:
 - Anticipated SIP schedule
 - How you will respond to NPS comments
- Please let us know:
 - When public comment period opens
 - If/when a public hearing will be held
- The NPS will:
 - Email call summary & any add'l information
 - **By June 4, 2021**
 - Share our comments with EPA Region 4

The NPS will submit an email summary of our May 25, 2021 consultation call along with final review comments by June 4, 2021.

The NPS requests that the state notify us when the draft SIP will be open for public review and comment, and alert us to any public hearing dates.

North Carolina DEQ staff agreed and shared their intent to summarize NPS input and respond to it in the public review draft.

NPS Contacts

Great Smoky Mountains National Park

- Jim Renfro; jim_renfro@nps.gov

NPS Southeast Region

- Denesia Cheek; denesia_cheek@nps.gov

Air Resources Division

- Melanie Peters; melanie_peters@nps.gov
- Don Shepherd; don_shepherd@nps.gov
- Andrea Stacy; andrea_stacy@nps.gov

Please reach out to us with any questions.

For any formal notifications of public documents, please include the above list of NPS staff.

NPS acknowledges and very much appreciates the impressive emission reductions that North Carolina has made since the beginning of the Regional Haze program. We also see that there is still significant progress to be made before we can reach the goal of unimpaired visibility. We welcome future opportunities to engage with North Carolina and work together on efforts to reduce haze causing pollution and promote clean air and clear views in our national parks.

NPS photo of night sky at Clingmans Dome, March 2018 by Thom McManus, Great Smoky Mountains NP.

From: [Andrew Whelan](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 13:00:09

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Dear NC Division of Air Quality,

I'm writing today to urge the NC Division of Air Quality to strengthen the NC Regional Haze Plan by expanding the list of selected pollution types and sources in its analysis.

Developing a strong Regional Haze Plan is an opportunity to protect our iconic natural treasures, and to protect the health of communities living near coal and industrial facilities. The Plan currently under consideration falls short of these goals. It excludes dozens of the heaviest polluters in our state from its analysis, and fails to consider nitrogen oxides – a primary contributor to haze pollution. Most disappointing is that none of the state's active coal plants were selected to reduce emissions, despite coal representing the largest source of nitrogen oxides in North Carolina.

The Division has clear authority under the Clean Air Act to make greater air visibility improvements at Class I areas in the state. I hope you will use that authority to protect our outdoor industry's economy, the environment, and help our state meet critical greenhouse gas and pollution reduction goals.

Please continue to fight for common-sense environmental solutions that protect North Carolina's most valuable resources, its people, and the places where we work and play.

Thank you for your consideration of my comments on this important matter.

Sincerely,
Andrew Whelan

From: [Lynne Gaudette](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:13:05

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I retired to North Carolina last year from Houston, Texas to escape the pollution there. What I am finding as a resident in Biltmore Lake is more haze and difficulty breathing. It is very disturbing to see the huge increase in haze over the Smoky Mountains since the 1980's.

The Department of Air Quality should have as its mission to preserve or mitigate problems with air quality. You have dramatically fallen short of that mission and are doing a disservice to North Carolina residents by allowing Duke Energy and paper mills to freely pollute our green State.

North Carolina must require strong, new controls on these sources of haze pollution that are harming air quality

From: [Ron&/orNancy Bryant](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Thursday, September 30, 2021 14:45:24

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We are so excited that you have a draft for addressing regional haze.

I came over the mountain from GA into NC when I was 16 in 1955 and came into the most glorious view of the mountains such that I resolved then and there that some day I would move to NC. I did move to NC in 1985, as haze was beginning to affect our views, but nothing like today.

It is the views, but even more important, it is the air pollution that is so critical to address right now.

As founder of CleanAIREnc, I know what devastation air pollution brings to both humans and the natural world.

Please, please, please, get this program “off the ground and into the air!”

Nancy C. Bryant
3 Eagles Sanctuary
Norwood, NC

From: [Katherine Marx](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Tuesday, September 21, 2021 16:47:06

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The worrisome trend of more wood burning is terribly harmful to human health, as well as further destroying the climate through clearcutting. Scientists have proven that biomass fuel is much worse for the environment than fossil fuels (in real-life usage, not highly manipulated lab settings). While clearcutting in NC and sending biomass fuel to Europe may be financially profitable, it is disastrous for the climate and for this state.

Many poorer and mountain residents burn wood for home heating due to North Carolina's very high cost of LP and natural gas. It costs less to heat a similar home in Minneapolis, MN than in the colder parts of NC. Please figure out how a much colder state such as MN is able to supply much more affordable heating options (not wood!) to their population, and see about bringing those options to NC. Or much better yet, invest in newer technologies that truly are not contributing to air pollution.

Local air from people burning wood for heating can be extremely toxic and unlivable for the unfortunate neighbors.

Thank you.
Katherine Marx

Sent from [Mail](#) for Windows

From: [Alexandra Mabel](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Sunday, September 12, 2021 12:01:52

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Thank you for your efforts to date in reducing pollution and haze, but the State should be taking more aggressive steps to reduce air pollution, including in its Regional Haze Plan.

North Carolina should expand the list of selected pollution sources and consider more pollutants in its analysis for the Regional Haze Plan.

Developing a strong Regional Haze Plan is an opportunity North Carolina shouldn't pass up. It's the state's best available tool to achieve important clean air progress for these special wildernesses and to proactively address the climate crisis. Furthermore, the same pollution that drives haze is also affecting the health of communities living near these coal and industrial facilities – disproportionately communities of color and where many residents are living below the poverty line.

For example, the Pilkington Glass manufacturing facility in Scotland County, a Title V permitted facility (designated as a major source of emissions under the Clean Air Act), is in a community of color where nearly 30% of people live below the poverty line. However, Pilkington Glass was not selected as a source to be controlled under the Haze Plan, leaving the nearby community at risk of the myriad health issues that air pollution causes.

If North Carolina were to include nitrogen oxide pollution in their Haze Plan as EPA has directed states to do, it could also mitigate the formation of ozone pollution and its adverse effects on human and plant health. Ground-level ozone can cause the muscles in the body's airways to constrict, making it more difficult to breathe, and it can aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.

Ozone pollution can also damage the tree canopy and plant life in the Smoky Mountains and other public lands. Ozone pollution harms plants by entering the stomata (pores used for respiration) and oxidizes (chemically degrades) the flesh of the plant during respiration; this reduces growth rates and endangers the survival of plants and trees, which in turn alters the ecosystem's natural processes over longer periods of time.

Thank you for your work on this plan - please make it stronger and more effective so that we can all have clean safe air to breathe and enjoy.

Sincerely,
Alexandra Mabel
Raleigh, NC

From: hansenforest@aol.com
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Monday, October 4, 2021 14:25:00

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The conclusion of the Regional Haze State Implementation Plan that no new pollution reductions are needed does not adequately address the EPA's expectation that states consider nitrogen oxides in addition to sulfur dioxides. Nor does it build on progress already achieved as directed by EPA.

It is not clear why coal-fired power plants were not evaluated since they are the biggest contributors to haze pollution in NC. Since Duke Energy is planning to retire some of their coal-fired plants in the next 10 years, the state should make these retirements an enforceable part of the Haze Plan.

The state should also look at nitrogen oxides at the two paper mills and PCS Phosphate to see if upgraded emission reduction technology should be required to improve on existing haze levels.

Thank you for your consideration.

Beth Hansen
3722 Amber Drive
Wilmington, NC 28409

From: [Gloria Shen](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] Reference to: NC RH SIP
Date: Friday, October 15, 2021 13:09:14

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Dear Administrators at the NC DENR:

I respectfully submit my comments below.

There must be action taken by the state to hold those industries and entities accountable for significantly diminished air quality in North Carolina.

Many of these manmade pollutants are carcinogens and they harm communities, wildlife, flora and water supplies.

People and wildlife do not have an option to simply not breathe air!

The areas of particular concern to me include the Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area and the Swanquarter Wilderness Area.

The state's Regional Haze Program must include planning processes that are rigorous in protecting everyone and everything in this state, from residents to native wildlife to the forests and streams. Too many corporations and business entities are making THEIR problem the problem of innocent parties and this has to stop.

Thank you.

Sincerely,
Gloria Shen



175 Main Street
Canton, NC 28716
828.646.2000
pactivevergreen.com

October 15, 2021

Mr. Randy Strait
Planning Section Chief
NC Department of Environmental Quality
Division of Air Quality (DAQ)
1641 Mail Service Center
Raleigh, NC 27699-1641

Subject: Blue Ridge Paper Products LLC Comments on the Draft North Carolina Regional Haze State Implementation Plan

Dear Mr. Strait:

Blue Ridge Paper Products LLC (BRPP) in Canton, North Carolina appreciates the opportunity to submit comments in support of the draft *Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019-2028)*. BRPP invested significant capital over the past five years in order to reduce both actual and allowable sulfur dioxide (SO₂) emissions from the Canton Mill by over 5,000 tons per year.

We acknowledge the tremendous amount of work performed by NC DAQ to assess progress toward future regional haze goals and consider the draft SIP reasonable and appropriate. NC is years ahead of the uniform rate of progress goal for end of the 2019-2028 planning period because of many emissions reductions that have been realized in recent years. BRPP appreciates NC DAQ's focus on the appropriate sources and pollutants to attain the regional haze reduction goals.

BRPP supports the determination that our existing controls demonstrate reasonable progress and that no additional controls are reasonable or feasible for the second planning period.

Finally, we support your conclusion that BRPP's obligations in the existing source-specific SO₂ SIP are sufficient and it is not necessary to include further requirements for BRPP in the Regional Haze SIP.

If you have any questions or require additional information, please contact Mr. Dan Meyer at (828) 646-2945.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Curry", with a long horizontal line extending to the right.

Daniel A. Curry
Director, Environmental Health and Safety
Evergreen Packaging



Domtar Paper Company, LLC
Plymouth Mill
P.O. Box 747
Highway 149 North
Plymouth, NC 27962
Tel: (252) 793-8111

October 13, 2021

Mr. Randy Strait
Planning Section Chief
NC Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Certified Mail
Return Receipt Requested

***Subject: Domtar Paper Company, LLC – Plymouth, NC
Comments on North Carolina Draft Regional Haze State Implementation Plan***

Dear Mr. Strait:

Domtar Paper Company, LLC (Domtar) appreciates the opportunity to review and comment on the Draft Regional Haze State Implementation Plan (SIP) for North Carolina's Class 1 Areas as proposed by the North Carolina Division of Air Quality (DAQ) for the Second Planning Period (2019-2028).

Domtar appreciates the tremendous amount of work that DAQ invested in drafting the SIP. Domtar also appreciates DAQ's conclusion that North Carolina has made reasonable progress to improve regional haze and that additional controls are not required to make further progress during the second planning period. DAQ focused its analysis on the appropriate sources and pollutants, given the work to determine what stationary sources might impact regional haze if reductions were required. We concur with DAQ's conclusions that the control measures currently in place on the No. 1 Hog Fuel Boiler are not necessary for reasonable further progress. We also concur with DAQ that no cost-effective control measures are available for the No. 2 Hog Fuel Boiler. Additionally, we offer a few comments, as provided below, for DAQ's consideration when finalizing the SIP.

Comment 1. Interest Rate

Domtar followed the guidance provided and utilized the current prime interest rate of 3.25% in the four-factor analysis. However, please note that this is not the interest rate that Domtar pays for borrowing money.

Review of Domtar's average cost of debt across our facilities indicates that we typically borrow at an interest rate around 6.5%. This average cost reflects both short-term and longer-term debt and is a conservative calculation. Any capital project related to the installation of additional control technology for the No. 2 Hog Fuel Boiler would be assessed over a long-term period; and, higher interest rate long-term debt would apply. Thus, Domtar believes that a 7% interest rate is a more appropriate rate for the assessing a capital project related to the installation of additional controls.

In its Control Cost Manual, EPA guides sources when performing a cost analysis, that it is important to use the nominal interest rate that the company faces and not a general interest rate, such as short-term prime. The Cost Control Manual notes "base rates used by banks do not reflect entity and project-specific characteristics and risks, including the length of project and credit risk of borrowers."¹

In the North Carolina Regional Haze SIP proposal, DAQ concluded for the Plymouth Mill that there are no cost-effective control measures available, based on the results of the four-factor analysis; and, additional controls are not needed for the purpose of remedying any existing anthropogenic visibility impairment at the Swanquarter Wilderness Area for the second planning period. Using the more appropriate interest rate of 7% rather than the default 3.25% interest rate would not change this conclusion; but, would further support the conclusion by resulting in the cost effectiveness analyses being even more economically infeasible.

Domtar intends to clarify for the record that using a default interest rate of 3.25% significantly underestimates its cost of money for capital projects and underestimates any cost effectiveness determinations such as in the four-factor analysis. Further, the prime interest rate has only been 3.25% during the COVID pandemic. It was 4.75% just prior to the pandemic and reached 5.5% as recently as December 2018. As the prime rate increases, the interest rate for Domtar also increases. The prime rate will likely be raised in 2023, making it unrepresentative of the interest rate when any reasonable controls would have been required to be installed. The use of a 7% interest rate is more appropriate for these assessments.

Additionally, within Section 7.8.1.2 of the draft SIP on page 294, DAQ states that the interest rate used in Domtar's four-factor analysis is 3.75%. The interest rate that Domtar used in the analysis is 3.25% as referenced in Appendix G-2 of the SIP; therefore, Domtar requests a correction to the SIP text in Section 7.8.1.2.

¹ https://www.epa.gov/sites/default/files/2017-12/documents/epaccmcostestimationmethodchapter_7thedition_2017.pdf

Comment 2. Clarification of Language Intended for the SIP

Section 7.8.3.1 of the draft SIP contains materials proposed for adoption into the regulatory portion of the North Carolina SIP for Domtar. It is unclear to Domtar how the specific language presented in that section will be translated into the SIP. Domtar requests that DAQ provide clarification as to how the conditions are intended to be presented in the SIP, including how the Title V Permit No. 04291T49 will be linked to all conditions. We request DAQ provide this clarification as soon as possible and prior to issuing the final rule so we can dialog further if additional clarification is needed.

Comment 3. Process to Address Permit Revisions and Impact to the SIP

Section 7.8.3.1 includes emission limits and the related monitoring, reporting and recordkeeping (MRR) for the No. 2 Hog Fuel Boiler for adoption into the regulatory portion of the North Carolina SIP. With the MRR requirements incorporated by reference to Title V Permit No. 04291T49 and SIP revisions requiring formal EPA review, it is unclear to Domtar what DAQ's procedure will be for managing permit changes in the future. There is added burden for the State to ensure any revisions to Title V permit requirements do not conflict with the SIP requirements which involves an added step for the permit writers to research and review the SIP. Domtar is requesting written clarification from DAQ and written concurrence from EPA Region 4 on the procedure for addressing permit changes within the site-specific SIP should the specific referenced permit requirements change in the future and clarification on when changes to the SIP will be required. We request DAQ provide this clarification including EPA Region 4 concurrence as soon as possible and preferably before issuing the final rule.

Comment 4. Table References

The table references within Section 7.8.1.2 (and other sections) of the SIP are off by one number. For example, language on page 291 states "Table 7-54 shows 2016 base year SO₂ emissions, initial 2028 projected emissions upon which the initial PSAT and final RPG modeling is based, and revised 2028 emissions provided by the facility used to prepare the revised PSAT contributions to visibility impairment to the Swanquarter Wilderness Area." However, this information is presented in Table 7-55.

Comment 5. Averaging Periods

It is our understanding that Regional Haze emission limits can take the form of a rolling 30-day average. Should in the future, any requirement for demonstrating compliance with any numerical limit as listed within the SIP and as related to potential impacts on visibility at the Swanquarter Wilderness Area, be assigned with an average period, it should be no less than 30-days.

Comment 6. Monitoring, Record Keeping and Reporting

The current Regional Haze SIP proposal for our facility includes emission limits and the related monitoring, reporting and recordkeeping (MRR) for the No. 2 Hog Fuel Boiler. We understand the state's position on including emission limitations in the Regional Haze SIP; but, it is unnecessary and duplicative to include the source specific MRR requirements since these are already authorized by the State's existing infrastructure SIP. The infrastructure SIP is federally enforceable.

Including MRR provisions in the Regional Haze SIP could also significantly hamper our operations and competitiveness and could stifle innovation by requiring a site-specific SIP change to adopt more efficient, up-to-date MRR technology. Site-specific SIP revisions can take years to finalize, which puts our business at a significant competitive disadvantage in the highly competitive global business climate in which we operate.

For the purposes of clarifying the record, Domtar contends that the MRR requirements as listed in the facility's Title V air permit 04291T49 are federally enforceable; and therefore, it is not necessary to include them in the Regional Haze SIP.

Closing

Domtar appreciates DAQ's conscientious efforts in drafting the proposed SIP. Thank you for the opportunity to review and provide comments for consideration when finalizing the SIP. We look forward to receiving a timely response from DAQ clarifying the language to be included in the SIP along with a response from DAQ and concurrence from EPA Region 4 on the process to address permit revisions and implications for the SIP.

Please contact Ms. Diane Hardison at 252-793-8611 if you need clarification on any of the items in this letter.

Sincerely,



Todd M. Rogers
Mill Manager



Diane R. Hardison
EH&S Manager

cc: Don Wynne – Domtar
Annabeth Reitter – Domtar

From: [Flynn, Aaron M.](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 15, 2021 17:09:09
Attachments: [Duke Energy's Comments on the NC RH SIP.pdf](#)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Attached please find the comments of Duke Energy on the North Carolina Department of Environmental Quality's Pre-Hearing Draft Regional Haze State Implementation Plan (SIP) for North Carolina Class I Federal Areas for Second Planning Period (2019 – 2028). If you have any questions, please contact me.

Sincerely,

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**Comments of Duke Energy on the North Carolina Department of Environmental Quality’s
Pre-Hearing Draft Regional Haze State Implementation Plan (SIP) for North Carolina
Class I Federal Areas for Second Planning Period (2019 – 2028)**

October 15, 2021

Duke Energy welcomes this opportunity to comment on the North Carolina Department of Environmental Quality’s (“DEQ”) Pre-Hearing Draft Regional Haze State Implementation Plan (“SIP”) for North Carolina Class I Federal Areas for the Second Planning Period (2019 – 2028) (“Draft SIP”). The state is preparing this Draft SIP to satisfy the requirements of sections 169A and 169B of the Clean Air Act (“CAA” or the “Act”),¹ the United States Environmental Protection Agency’s (“EPA” or the “Agency”) regional haze rule (“RHR”),² and applicable guidance for the second planning period of the program (2018-2028).³ Consistent with those requirements and Agency guidance, the State has prepared a well-supported plan for making reasonable progress toward the national visibility goal. Duke Energy offers these comments in support of the Draft SIP and additional analysis to support the DEQ’s proposed conclusions with respect to Duke Energy’s facilities. Duke Energy also welcomes the opportunity to continue to provide North Carolina with data, analysis, and other technical support to help facilitate the SIP’s finalization.

I. The Scope of State Discretion Under the Regional Haze Program Supports DEQ’s Draft SIP.

The CAA’s regional haze program embodies the Act’s concept of cooperative federalism. EPA is tasked with setting the rules for the development of regional haze SIPs, and the CAA assigns responsibility for designing those SIPs to the states. Specifically, the statute and the RHR call on states to prepare SIPs that contain a long-term strategy for making reasonable progress and to develop reasonable progress goals (“RPGs”) for the Class I areas located within the state. States develop the measures to include in their long-term strategies by evaluating the four reasonable progress factors:

- The costs of compliance;
- The time necessary for compliance;
- The energy and nonair quality environmental impacts of compliance; and
- The remaining useful life of any existing source subject to such requirements.⁴

North Carolina has expansive discretion in how it takes the four reasonable progress factors into account and in how to weigh and evaluate them. It has equally broad discretion, as confirmed by EPA guidance, to decide whether to evaluate individual sources or groups of sources pursuant to the factors and to screen sources out of a four-factor analysis altogether. EPA’s rules and guidance require only that states satisfy the basic requirements of the Act and that the states’

¹ 42 U.S.C. §§ 7491, 7492.

² 40 C.F.R. § 51.308(f).

³ See generally <https://www.epa.gov/visibility/visibility-guidance-documents>.

⁴ 42 U.S.C. § 7491(g).

analysis and decision-making be reasonable. These standards are intended to allow states considerable leeway in deciding how best to implement the regional haze program.

Some of the earliest court decisions addressing regional haze emphasized the primacy of the states in making regional haze decisions. In *American Corn Growers Association v. EPA*,⁵ the U.S. Court of Appeals for the D.C. Circuit held that EPA could not limit the states' discretion over how to weigh factors under the program.⁶ In reaching that conclusion, the court said that states "play the lead in designing and implementing regional haze programs," that "Congress directed states to make" the judgment as to how to weigh the factors, and that the 1999 version of the RHR was ultimately "inconsistent with the Act's provisions giving the states broad authority" over the program.⁷

In response, EPA has itself recognized state discretion to decide how to address regional haze. Even in its 1999 RHR, EPA emphasized that "flexibility for State discretion is, of course, exactly what the regional haze rule provides."⁸ In its most recent revision to the RHR, the Agency similarly stated that "EPA has consistently interpreted the CAA to provide states with the flexibility to conduct four-factor analyses for specific sources ... depending on state policy preferences and the specific circumstances of each state."⁹

Recent EPA guidance reaffirms this state discretion. In its August 2019 Guidance, EPA explained that states have discretion to balance the four statutory factors and five additional considerations specified in the RHR in determining what control measures are necessary to make reasonable progress.¹⁰ EPA's 2021 Guidance further explains that "while states have discretion to reasonably select sources, this analysis should ... ensure that source selection ... has the potential to meaningfully reduce their contributions to visibility impairment."¹¹

As discussed in these comments, North Carolina has made appropriate and reasonable use of its discretion to devise its regional haze SIP for the second planning period of the program. The record contains extensive analysis and technical work. North Carolina has used that technical work to provide a reasoned analysis of the relevant issues, including a thorough explanation for its decisions regarding Duke Energy's facilities. Further, the state has consulted with its neighboring states and with the Federal Land Managers ("FLMs") and responded to their requests. Conducting this reasoned analysis is exactly what the CAA and the RHR require.

⁵ 291 F.3d 1 (D.C. Cir. 2002).

⁶ The decision addressed the five factors for assessing the program's best available retrofit technology ("BART") program, but it should be interpreted to apply with equal weight to the related reasonable progress factors.

⁷ *Id.* at 2, 6, 8.

⁸ 64 Fed. Reg. 35,714, 35,760 (July 1, 1999).

⁹ 82 Fed. Reg. 3078, 3088 (Jan. 10, 2017).

¹⁰ EPA, *Guidance on Regional Haze State Implementation Plans for the Second Implementation Period*, at 4 (Aug. 20, 2019) (hereinafter "2019 Guidance").

¹¹ EPA, *Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period*, at 3 (July 8, 2021) (hereinafter "2021 Guidance").

II. The State’s Screening Threshold Was Reasonable.

Neither the CAA nor the RHR dictates the types and/or number of sources that a state must select for reasonable progress analyses during the second and subsequent planning periods. This differs significantly from the regulatory scheme for BART that was at issue during the first planning period.¹² Indeed, the RHR only requires that a state include a description of the criteria it used to determine which sources or groups it evaluated for reasonable progress analysis.¹³ EPA has acknowledged that “States have discretion to choose any source selection threshold or methodology that is reasonable.”¹⁴ Such choices must be “reasonably explained and produce a reasonable outcome.”¹⁵ North Carolina has chosen a screening threshold that is both reasonable and consistent with the law and EPA guidance.

North Carolina—along with all the other VISTAS states—relied on a reasonable two-step screening process that utilized both residence time analysis and photochemical modeling. EPA endorsed both techniques as reasonable methods for examining source impacts for the second implementation period and described these methods as more sophisticated than the emissions divided by distance (“Q/d”) metric used during the first planning period.¹⁶

During step 1, the State conducted a screening analysis using SO₂ and NO_x facility contributions based on the results of an area of influence (“AOI”) analysis. In-state sources with a combined AOI threshold of 3.00% (sulfate + nitrate contribution) or greater were selected to undergo CAMx Particulate Matter Source Apportionment Technology (“PSAT”) modeling at step 2. In total, 87 facilities were identified as exceeding the 3.00% AOI threshold for at least one Class I area in North Carolina.¹⁷ Only one in-state Duke Energy facility—the Marshall Steam Station—had a sulfate or nitrate AOI contribution at or above the 3.00% threshold for any Class I area.¹⁸ Notably, the 3.00% threshold was also used by Tennessee and is more stringent than the threshold relied on by some other VISTAS states. Florida, for instance, relied on a screening threshold of 5.00% at step 1 in its draft regional haze SIP.¹⁹ Thus, any source that had an individual AOI contribution of 5.00% or greater for nitrates or sulfates at Florida Class I areas was tagged for PSAT modeling.

At step 2, PSAT modeling was conducted to determine which facilities would undergo a reasonable progress analysis. Sources with a PSAT threshold that met or exceeded 1.00% were examined for reasonable progress analysis.²⁰ A total of 19 facilities exceeded the 1.00% threshold. Three of the sources—Blue Ridge Paper Products – Canton Mill; Domtar Paper Company, LLC; and PCS Phosphate Company, Inc.—are located in North Carolina.²¹

¹² See 42 U.S.C. § 7491(b)(2)(A) (describing specifically what sources are subject to BART).

¹³ 40 C.F.R. § 51.308(f)(2)(i).

¹⁴ 2021 Guidance at 3.

¹⁵ *Id.*

¹⁶ 2019 Guidance at 12-13.

¹⁷ Draft SIP at 225.

¹⁸ *Id.* at 232, Table 7-29.

¹⁹ Florida Department of Environmental Protection, *Florida Regional Haze Plan for the Second Implementation Period for Florida Class I Areas*, at 229 (June 9, 2021).

²⁰ Draft SIP at 266.

²¹ *Id.* at 267.

This multi-step process was reasonable on several grounds. First, the screening threshold the State relied on was more stringent than the threshold previously used by a majority of VISTAS states during the first planning period. As pointed out in the Draft SIP, many VISTAS states used the AOI approach and a 1% threshold per emission unit.²² For the second planning period, the State relied on a 1.00% PSAT threshold by facility to screen sources, resulting in a more stringent standard compared to an emission unit-by-unit test.²³ Moreover, the State reasonably explained that conducting PSAT modeling was preferred over an AOI analysis alone because that technique tended to overestimate impacts for facilities near the Class I area. As a result, the State appropriately concluded that PSAT was the most reliable modeling tool for tracking facility contributions in Class I areas and relied on a PSAT-based threshold for source selection.

Second, the screening threshold captured a meaningful portion of North Carolina's total contribution to visibility impairment. As previously mentioned, when preparing SIP revisions for the second planning period, states are not required to identify a specific number of sources for reasonable progress analysis, but are only required to set a threshold that "captures a meaningful portion of the state's total contribution to visibility impairment to Class I areas."²⁴ Therefore, thresholds that only capture a "small portion of a state's contribution to visibility impairment" or exclude "a state's largest visibility impairing sources" may be deemed unreasonable.²⁵ North Carolina's screening methodology does neither.

Despite significant reductions in visibility impairing pollutants within the state, North Carolina's screening threshold still resulted in three in-state sources being selected to undergo a reasonable progress analysis. While these sources are expected to have relatively small impacts on visibility, they represent the largest in-state contributors to visibility impairment. In the Swanquarter Wilderness Area, for instance, North Carolina estimated that 22.20% of total visibility impairment in 2028 will be attributable to sulfate and nitrate from point sources.²⁶ The screening 1.00% PSAT threshold resulted in 10 facilities (two in North Carolina) being identified for further analysis. These 10 facilities accounted for 94% of the total visibility impacts attributable to point sources, and, therefore, accounted for nearly all of North Carolina's point sources—as well as all other states' point source contributions—to this Class I area.

Third, the screening method was an objective metric that did not arbitrarily exclude relevant sources. EPA has explained that "a state should not select some sources for analysis but decline to select other, similarly situated sources (*e.g.*, in terms of emissions, visibility impacts, feasibility of controls)."²⁷ Rather than analyzing only a source's emissions or some other singular element, North Carolina's screening methodology took into account numerous factors, including geography and meteorology, that more accurately demonstrate which sources have the largest impacts to visibility.²⁸ As explained further below, the Duke Energy facilities are not

²² *Id.* (emphasis in original).

²³ *Id.* (emphasis in original).

²⁴ 2019 Guidance at 19.

²⁵ 2021 Guidance at 3.

²⁶ Draft SIP at 267.

²⁷ 2021 Guidance at 4.

²⁸ For instance, one source that was selected under the threshold—Blue Ridge Paper's Canton Mill—is estimated to emit 1,127.1 tons per year ("tpy") of SO₂ in 2028, which is less than the Marshall Steam Station (4,139.2 tpy).

“similarly situated sources,” because of their incredibly small visibility impacts to Class I areas. It would have been unreasonable for North Carolina to use a screening methodology that would have required insignificant in-state sources to undergo a four-factor analysis just for the sake of having more sources identified during the source selection stage.

III. North Carolina Has Appropriately Considered Visibility in Deciding Not to Evaluate Duke Energy Facilities for Reasonable Progress Controls.

While the use of the 1.00% PSAT screening threshold was reasonable in and of itself, North Carolina could have also reasonably excluded Duke Energy facilities from further analysis based solely on their negligible effect on visibility. In its 2019 Guidance, EPA confirmed that states may use a visibility impact metric threshold to eliminate sources from further reasonable progress evaluations.²⁹ If relying on a visibility metric, EPA recommended that such measures be expressed in inverse megameters of light extinction (“Mm⁻¹”).³⁰ Most recently, EPA has stated that visibility impacts “should be assessed in the context of the individual state’s contributions to visibility impairment, rather than total impairment at a Class I area.”³¹

As the modeling shows, North Carolina is expected to contribute very little visibility impairment to Class I areas in 2028.³² The Class I area that North Carolina is anticipated to impact the most is the Swanquarter Wilderness Area. It is projected that sulfate and nitrate emissions from all source sectors from all states in 2028 will cause 16.40 Mm⁻¹ of visibility impairment; North Carolina will contribute approximately 1.83 Mm⁻¹ of that visibility impairment.³³

North Carolina selected sources that have relatively low visibility impacts on Class I areas compared to sources in other states; however, the State acted reasonably in its discretion, when it deemed that these sources could be meaningful in relation to its limited contributions to visibility impairment. Notably, the sources selected for reasonable progress analysis by North Carolina are projected to contribute a combined 0.53 Mm⁻¹ of visibility impairment to Class I areas in 2028. By way of comparison, Connecticut, in its draft SIP, elected to require sources that would contribute at least 3 Mm⁻¹ of visibility impairment to any Class I area to undergo a four-factor analysis.³⁴ To put this further into perspective, the source in North Carolina with the projected largest impact on visibility to a Class I area is PCS Phosphate, which is expected to contribute 0.207 Mm⁻¹ of visibility impairment to the Swanquarter Wilderness Area.

The Duke Energy facilities’ visibility impacts are significantly smaller than those of the sources selected to undergo reasonable progress control analysis. For instance, the Duke Energy facility with the highest projected visibility impact for the Swanquarter Wilderness Area is the Marshall

However, the Marshall Steam Station is estimated to have a much less significant impact on the relevant Class I area (Shining Rock) because it is located 166 miles away from the area, whereas Canton Mill is only 16.9 miles away. North Carolina’s screening method appropriately accounted for such factors.

²⁹ 2019 Guidance at 19.

³⁰ *Id.*

³¹ 2021 Guidance at 14.

³² See Draft SIP at 171-75, Figures 7-27 to 7-31.

³³ *Id.* at 176-77, Table 7-14.

³⁴ Connecticut Department of Energy and Environmental Protection, *Connecticut Regional Haze State Implementation Plan Revision for the Second Implementation Period (2018-2028)*, at 82 (Nov. 2020).

Steam Station. That facility is projected to contribute 0.079 Mm^{-1} of visibility impact—less than half the visibility impact of PCS Phosphate.³⁵ The Marshall Steam Station is not an outlier. The other Duke Energy facilities that were screened out during step 1 of the source selection process based on their AOI results were projected to have even smaller visibility impacts on in-state Class I areas. Those other Duke Energy facilities with lower AOI results than the Marshall Steam Station include the Cliffside Steam Station, Belews Creek Steam Station, Asheville Steam Electric Plant, and Roxboro Steam Electric Plant.

Given their insignificant visibility impacts, there can be no justification for requiring Duke Energy facilities to undergo additional analyses. This conclusion is further confirmed by the fact that North Carolina has already achieved significant progress toward achieving natural visibility in Class I areas. The SIP notes that the 2028 RPGs place each Class I area 10 to 20 years ahead of the uniform rate of progress (“URP”) glidepath.³⁶ While EPA has made it clear the URP is not a “safe harbor,”³⁷ it does provide additional support for North Carolina’s conclusion that Duke Energy facilities do not require further analysis based on wholly independent grounds, including their relatively minor visibility impacts and state-of-the-art controls.³⁸ Moreover, the fact that no electric generating units (“EGUs”) were selected for a reasonable progress controls analysis reflects that the overwhelming amount of visibility impairing pollutants from North Carolina during the second planning period are expected to come from non-EGU point sources. Therefore, even when assessing visibility impairment solely within the context of North Carolina’s small contributions to visibility impairment, it follows that Duke Energy facilities and other EGUs would not be subject to further analysis. Duke Energy recommends that the state include these findings in its Draft SIP.

IV. The State Has Authority to Focus on Sulfate as the Primary Pollutant of Concern.

In its 2019 Guidance, EPA explained that “[w]hen selecting sources for analysis of control measures, a state may focus on the PM species that dominate visibility impairment at the Class I areas affected by emissions from the state and then select only sources with emissions of those dominant pollutants and their precursors.”³⁹ EPA further explained “it may be reasonable for a state to not consider measures for control of the remaining pollutants from sources that have been selected on the basis of their emissions of the dominant pollutants.”⁴⁰

EPA’s 2021 Guidance says that in nearly all Class I areas, the largest PM components of visibility impairment are sulfate and nitrate caused by PM precursors SO_2 and NO_x , and that EPA generally expects that states analyze SO_2 and NO_x in selecting sources and determining control measures.⁴¹

³⁵ Draft SIP at 233, Table 7-30.

³⁶ *Id.* at 307. The URP is the “consistent rate of progress over time, starting at the baseline period of 2000-2004, that would be needed to attain the natural visibility condition on the 20 percent most anthropogenically impaired days by the year 2064.” 2019 Guidance at A-2.

³⁷ 2021 Guidance at 15.

³⁸ See Section V, *infra*.

³⁹ 2019 Guidance at 11.

⁴⁰ *Id.*

⁴¹ 2021 Guidance at 4.

The approach taken by DEQ in the Draft SIP is fully consistent with these positions. As the Draft SIP explains:

IMPROVE monitoring data for the modeling base period (2009-2013) and current conditions (2014-2018) shows sulfate as the most important pollutant (followed by nitrate) contributing to visibility impairment in VISTAS Class I areas. Therefore, the area of influence (AoI) analysis focused on sulfate and nitrate for the purpose of identifying the sectors and emission sources with the potentially highest contribution to visibility impairment in VISTAS and non-VISTAS Class I.⁴²

That analysis showed that sulfate was by far the more significant source of visibility impairment in affected Class I areas:

Visibility impacts from sulfate as a function of Mm^{-1} per ton are universally higher than the same for nitrate, in some cases by a factor of 100 or more. These results indicate that reducing one ton of SO_2 has a significantly higher impact on improving visibility at these Class I areas rather than controlling one ton of NO_x supporting the NCDAQ's [North Carolina DEQ, Division of Air Quality] decision, in part, to focus on requesting facilities to perform four-factor analyses on only SO_2 emissions for this second planning period.⁴³

Accordingly, consistent with EPA guidance, the State has focused on the most significant species of PM—sulfate and nitrate—when deciding which sources to select for four-factor analyses. It has, moreover, reasonably chosen to evaluate SO_2 emission controls where the state has requested those four-factor analyses because nitrate is almost universally below its well-supported threshold for impacts of significance. Indeed, no Duke Energy facility even approaches the 1.00% threshold with respect to its contribution to nitrate. Those nitrate contributions are, with the exception of one facility, all well-below 1.00%, and the one facility that exceeded 1.00% was nevertheless well-below the 3.00% threshold for combined nitrate and sulfate.⁴⁴

V. Current Controls for the Duke Energy Facilities Are Sufficiently Stringent that No Additional Controls Are Reasonable.

EPA's 2019 Guidance explains that a source that might otherwise undergo a four-factor analysis need not do so if it is "effectively controlled."⁴⁵ EPA further explains that "a state may already have information on one or more of the four reasonable progress factors at the time of source selection."⁴⁶ And "in particular circumstances, that information may indicate that it is reasonable to exclude the source for evaluation of emission control measures because it is clear at this step that no additional control measures would be adopted for the source."⁴⁷

⁴² Draft SIP at 178.

⁴³ *Id.* at 343.

⁴⁴ *See id.* at 220-24, Tables 7-20-7-24.

⁴⁵ 2019 Guidance at 22-25.

⁴⁶ *Id.* at 20.

⁴⁷ *Id.*

EPA goes on to provide specific, though non-exclusive, examples of when a reasonable progress analysis might not be necessary, including:

- Sources subject to a new source performance standard reviewed by EPA since July 31, 2013.
- Sources subject to best available control technology (“BACT”) or lowest achievable emission rate (“LAER”) limit after July 31, 2013, on a pollutant-specific basis.
- For SO₂, an EGU that had add-on flue gas desulfurization (“FGD”) that meets the SO₂ limit of the 2012 Mercury Air Toxics Standards (“MATS”).
- For SO₂ and NO_x control measures, a combustion source that, during the first implementation period, installed an FGD system that operates year-round with an effectiveness of at least 90 % or by the installation of a selective catalytic reduction (“SCR”) system that operates year-round with an overall effectiveness of at least 90 %.

The 2021 Guidance does not alter this position, but it does note that states must “demonstrate why, for that source specifically, a four-factor analysis would not result in new controls and would, therefore, be a futile exercise.”⁴⁸

Table 7-43—Controls, Operating Status, and Federal Rules for Duke Energy Facilities—of the Draft SIP demonstrates that nearly all of the Duke Energy facilities comply with the specific examples enumerated by EPA in the 2019 Guidance document. All of the coal-fired units that continue to operate have FGD and are subject to MATS. Notably, the National Park Service agrees that Belews Creek Steam Station, Cliffside Steam Station, Roxboro Steam Electric Plant, Mayo Electric Generating Plant, and Marshall Steam Station “are already effectively controlled for SO₂.”⁴⁹

As to NO_x, most of the Duke Energy units are already controlled with SCR, often along with advanced combustion controls. These units should all qualify as well-controlled for purposes of the RHR and EPA’s Guidance. The National Park Service nevertheless requested a four-factor analysis for NO_x for Belews Creek Steam Station, Cliffside Steam Station, Roxboro Steam Electric Plant, and Mayo Electric Generating Plant.⁵⁰ The state has provided a well-reasoned response to this comment. It could also refer to the EPA guidance on this matter.

Allen Steam Station is equipped with advanced combustion controls and SNCR, and Marshall Steam Station is equipped with advanced combustion controls and SNCR on units 1, 2, and 3, while unit 4 is equipped with SCR and combustion controls. The ability to co-fire natural gas with coal at the Marshall Station, which has been added in 2021, provides further reductions in NO_x. H.F. Lee Steam Electric Plant formerly operated three coal-fired units that were retired in 2012 and have been replaced by the H.F. Lee Energy Complex, which includes a natural gas-

⁴⁸ 2021 Guidance at 5.

⁴⁹ Draft SIP at 348.

⁵⁰ *Id.*

fired combined cycle facility consisting of three combustion turbines and a steam recovery boiler/turbine equipped with SCR, and five natural gas-fired simple cycle combustion turbines. Emissions of NOx from the Marshall Steam Station, the only one of these sources that was selected for additional PSAT modeling, already have an extraordinarily small impact on Class I areas.⁵¹ As explained above, it would be helpful for the State to characterize the visibility impacts of these facilities, explaining what the inverse megameter values mean, perhaps by comparing them to deciview impacts, as part of its justification for not seeking additional controls or for subjecting the facilities to unnecessary four-factor analyses. Further, explaining that changing the controls at these facilities is likely to be extremely costly for relatively little incremental emission reduction or visibility benefit.

Providing additional discussion in the Draft SIP as to how these controls specifically satisfy EPA's guidance would help to further strengthen the Draft SIP, consistent with the 2021 Guidance request that states provide source-specific analysis of these issues.

As with other Duke Energy sources noted above, the National Park Service requested a four-factor analysis for the Marshall Steam Station. The state has provided a well-reasoned response, explaining that the existing coal-fired units will be upgraded to burn natural gas this year and emissions are therefore already likely to fall significantly, likely far below what could be achieved through additional add on controls at this facility.⁵² Indeed, such a change in fuel source must exceed what is called for to make reasonable progress.

Finally, EPA's 2021 Guidance says that when making a decision to screen a source out of four-factor analysis based on an effective control determination, states "should further consider information specific to the source, including recent actual and projected emission rates, to determine if the source could reasonably attain a lower rate."⁵³

VI. It Is Appropriate for the State to Consider and Rely on Other Factors When Screening Out Sources from Four-Factor Review.

EPA's 2019 Guidance explains how states can consider the four reasonable progress factors even at the source screening stage, as an additional source of information and an independent basis for choosing to screen sources from further four-factor review. The 2019 Guidance notes that visibility will often be the most relevant consideration but that states may consider the four factors when they "already have information on one or more of the four reasonable progress factors at the time of source selection."⁵⁴ In particular, the 2019 Guidance explains that a cost analysis, either site-specific or generic based on EPA's Control Cost Manual, can be used for this purpose.⁵⁵ As noted above, because the Duke Energy units are already subject to extremely effective controls, it is certain that additional controls would not be cost-effective.

⁵¹ See Draft SIP at 233, Table 7-30.

⁵² *Id.* at 348.

⁵³ 2021 Guidance at 5.

⁵⁴ 2019 Guidance at 20.

⁵⁵ *Id.* at 21.

States may also consider EPA’s five additional regulatory factors found at 40 C.F.R. § 51.308(f)(2)(iv) in the RHR when making decisions about selecting sources for four-factor analyses or screening sources out from further review. Those factors are:

- Emission reductions due to ongoing air pollution control programs, including measures to address reasonably attributable visibility impairment;
- Measures to mitigate the impacts of construction activities;
- Source retirement and replacement schedules;
- Basic smoke management practices for prescribed fire used for agricultural and wildland vegetation management purposes and smoke management programs; and
- The anticipated net effect on visibility due to projected changes in point, area, and mobile source emissions over the period addressed by the long-term strategy.

Considerations relevant to the five factors already appear in North Carolina’s Draft SIP in section 7.9 with respect to including those matters in the Draft SIP generally. Many of these considerations also appear throughout the Draft SIP in other places as well, such as in the Draft SIP’s discussion of Duke Energy’s plans for reducing greenhouse gas emissions. That program will necessarily result in lower emissions of visibility impairing pollutants as well.

The factors are also reflected in the Draft SIP’s discussion of significant early reductions of SO₂ and NO_x emissions pursuant to North Carolina’s Clean Smokestacks Act.⁵⁶ According to NCDAQ, North Carolina is only state that adopted a state law requiring power plants to install controls to reduce NO_x and SO₂ emissions for the purpose of improving visibility to this extent, meaning that North Carolina sources significantly exceeded first planning period emission reduction targets years in advance. It is appropriate for the state to include these early emission reductions in its current Draft SIP as part of its long-term strategy for the second planning period. The early emission reductions beyond first planning period requirements should be recognized during the second planning period and not simply raise the bar even higher for North Carolina. Indeed, EPA has recognized that early, voluntary emission reductions can and should be counted toward state efforts to achieve reasonable progress.⁵⁷

The factors encompass the Draft SIP’s recognition of EPA’s finalized boiler NESHAP, which required facilities subject to section 112(j) to revise their permits to comply with section 112(d) requirements by May 2020.

The factors encompass “on-the-way” measures, like pending unit shutdowns. This includes one enforceable “on-the-way” measure for Duke Energy facilities. The Allen Steam Station must cease operations at its coal units 1-3 by December 2024 pursuant to a consent decree. (We also

⁵⁶ The law required coal-fired power plants to reduce NO_x emissions 77% by 2009, and SO₂ emissions by 49% by 2009, and 73% by 2013.

⁵⁷ See, e.g., 79 Fed. Reg. 46,513, 46,516 (Aug. 8, 2014) (crediting early, voluntary emission reductions towards regional haze compliance).

note that Duke Energy has already retired unit 3 and will be retiring units 2 and 4 by December 31, 2021, and as noted in Table 7-43, Duke Energy plans to retire all of the existing units by December 31, 2024.) All coal-fired units at Buck, Dan River, and Riverbend have been retired pursuant to that same consent decree, and only the newer and well-controlled units 5 and 6 remain in operation at Cliffside (Rogers Energy Complex). According to NCDAQ, the total amount of SO₂ from these facilities will be 791.12 tpy in 2028, down from 1,549.75 tpy in 2019.

Similarly, Table 7-43 also provides various other facility retirement dates that would occur during the second planning period. These retirement dates are not federally enforceable at this time, and EPA has often suggested that enforceability of unit shutdowns is necessary for those shutdowns to be accounted for in a regional haze SIP. This arguably could be a correct interpretation of the RHR with respect to a remaining useful life assessment as part of a four-factor analysis. It should not, however, be a requirement for considering such shutdowns pursuant to additional factor (E)—*anticipated* net effect on visibility due to *projected* changes in point, area, and mobile source emissions over the period addressed by the long-term strategy.⁵⁸ The title of this factor itself makes clear that federal enforceability and absolute certainty are not prerequisites to reasonable projection of anticipated changes in emissions. Moreover, it is important to note that on October 13, 2021, Governor Cooper signed comprehensive energy legislation into law creating a new framework that puts North Carolina on a path to achieve a 70% carbon reduction by 2030 and net-zero by 2050. In order to achieve these reductions, additional coal plant retirements will be required by 2030.

In its 2021 Guidance, EPA could be interpreted to suggest that consideration of the five additional factors should be limited in some circumstances.⁵⁹ The 2021 Guidance specifically says some of the factors should not be used to “reject cost-effective and otherwise reasonable controls merely because there have been emission reductions since the first planning period owing to other ongoing air pollution control programs or merely because visibility is otherwise projected to improve at Class I areas.”⁶⁰ The 2021 Guidance goes on to say that EPA “do[es] not think a state should rely on ... [the] factors to summarily assert that the state has already made sufficient progress and, therefore, no sources need to be selected or no new controls are needed regardless of the outcome of four-factor analyses.”⁶¹ Of course, that is not what North Carolina has done or should do. Consideration of these factors would not be the sole basis for rejecting cost-effective controls for Duke Energy’s facilities. There are no cost-effective controls to reject. They would likewise not be the sole basis for summarily concluding reasonable progress has been achieved. Many other considerations, like visibility conditions and the well-controlled status of existing facilities, among many other considerations, provide independent bases for concluding no additional controls are warranted as to the Duke Energy facilities. Nevertheless, it is appropriate, consistent with the 2019 Guidance, to take into account the five additional factors when evaluating all of the many different factual bases for concluding that additional controls for the Duke Energy facilities are not reasonable at this time.

⁵⁸ 40 C.F.R. § 51.308(f)(2)(iv)(E).

⁵⁹ 2021 Guidance at 13.

⁶⁰ *Id.*

⁶¹ *Id.*

Further, EPA's rules and guidance have always contemplated that states would take advantage of emission reductions from other CAA programs and similar state authorities to make reasonable progress, thereby avoiding the need to impose controls directly pursuant to the reasonable progress requirement. In the 1999 RHR, EPA described leveraging these other emission reductions:

In determining the emissions and visibility improvement achieved during each implementation period, States should include all air quality improvements that will be achieved by other programs and activities under the CAA and any State air pollution control requirements. Therefore, any reasonable progress goal for a Class I area should reflect at least the rate of visibility improvement expected from the implementation of other 'applicable requirements' under the CAA during the period covered by the long-term strategy. Consequently, States must take into account, at a minimum, the effect of measures to meet the NAAQS, the national mobile source program, and other applicable requirements under the CAA on Class I area visibility.⁶²

EPA went on to note that at least for the first planning period, the rules already on the books "will provide the visibility improvement and emissions needed for reasonable progress during the first regional haze implementation plan."⁶³

EPA itself officially continued that policy in a series of rules allowing compliance with the Clean Air Interstate Rule and then the Cross-State Air Pollution Rule to serve as a substitute for regional haze requirements for NO_x and SO₂. Discounting these emission reductions and their positive impacts on visibility runs counter to the intention and the history of the regional haze program.

For these reasons, Duke Energy recommends that North Carolina consider adding discussion of the four factors and the five additional factors to its rationale for not requiring the Duke Energy facilities to undergo four-factor analyses. Because the consideration of these factors should not be viewed as a necessary element of the state's rationale for screening out the Duke Energy facilities, but instead as additional support for the state's already well-founded decision, North Carolina's discussion of these factors should be framed appropriately.

⁶² 64 Fed. Reg. at 35,733.

⁶³ *Id.*; see also *id.* at 35,760 ("[I]f States established reasonable progress goals equivalent to the amount of visibility improvement which could be achieved by other CAA programs, the incremental control costs of the regional haze rule may be less than the costs estimated in the" regulatory impact analysis.).

From: [Michelle Whitehouse](#)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:22:45

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Dear Abraczinskas Director,

I write today because I deeply value national parks and wilderness areas like those in North Carolina protected under the Regional Haze Rule. I am deeply disappointed that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit places like Great Smoky Mountains National Park and Joyce Kilmer, Shining Rock, Linville Gorge and Swanquarter Wilderness Areas as well as the thousands of NC residents who live around polluting facilities.

North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor even considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state and should have enforceable retirements required through this plan. The plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable when new, cost-effective upgrades could deliver important clean air gains. NC DAQ must revisit stakeholders concerns and correct these harmful oversights and omissions.

Our treasured parks and wildernesses are home to sensitive ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. Clean air is critical to protecting their health and vitality as well as preserving my own enjoyment of these places through clear views and healthy skies. Please be true to your mission to safeguard North Carolina's natural resources and people's health by improving this plan.

Regards,
Michelle Whitehouse
223 Sequoyah Ln
Brevard, NC 28712

From: [Barry Anderson](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:20:34

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Regards,
Barry Anderson
111 W Oregon Ave
Kill Devil Hills, NC 27948

From: [Gretchen Zeiger-May](#)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:19:09

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Dear Abraczinskas Director,

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Regards,
Gretchen Zeiger-May
4791 Yellowwood Dr
Shallotte, NC 28470

From: [Gerry Hoots](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:17:26

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Dear Abraczinskas Director,

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Regards,
Gerry Hoots
3627 Dewsbury Rd
Winston-salem, NC 27104

From: [Lynne C.](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:16:24

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Dear Abraczinskas Director,

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Regards,
Lynne C.
6032 Kentworth Dr
Holly Springs, NC 27540

From: [Ulla Reeves](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:15:27

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Regards,
Ulla Reeves
221 Fairfax Ave
Asheville, NC 28806

From: [Jessica Gustines](#)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 12:14:40

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Dear Abraczinskas Director,

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Regards,
Jessica Gustines
615 Biltmore Ave
Asheville, NC 28803

From: [Chris Bradshaw](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Wednesday, October 13, 2021 13:18:00

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Dear Director Abraczinskas,

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Regards,
Chris Bradshaw
720 Club Dr
Salisbury, NC 28144

From: [Joan Roberts](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Thursday, October 14, 2021 09:57:17

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Dear Director Abraczinskas,

I write today because I deeply value national parks and wilderness areas like those in North Carolina protected under the Regional Haze Rule. I am deeply disappointed that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit places like Great Smoky Mountains National Park and Joyce Kilmer, Shining Rock, Linville Gorge and Swanquarter Wilderness Areas as well as the thousands of NC residents who live around polluting facilities.

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Regards,
Joan Roberts
68 5th Ave
Asheville, NC 28806

From: [Wendy Stevens](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Thursday, October 14, 2021 09:53:01

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Regards,
Wendy Stevens
7024 Hidden Creek Dr
Charlotte, NC 28214

From: [Kathryn Wright](#)
To: [SVC_DENR.DAO.publiccomments](#)
Subject: [External] NC RH SIP
Date: Friday, October 1, 2021 13:11:04

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Dear Abraczinskas Director,

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Regards,
Kathryn Wright
620 Lighthorse Cir
Aberdeen, NC 28315

From: [Anna Chott \(anna.chott21@gmail.com\) Sent You a Personal Message](mailto:anna.chott21@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 28, 2021 22:01:21

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Dear N.C. Division of Air Quality,

Now is our chance to make renewable energy a priority, whether it is to prevent haze pollution, human health risks, or climate change.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Anna Chott
1861 Tryon Dr Unit 3
Fayetteville, NC 28303
anna.chott21@gmail.com
(314) 608-4130

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sylvia Bjorkman \(sjbdrb@gmail.com\) Sent You a Personal Message](mailto:Sylvia.Bjorkman@sjbdrb@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 28, 2021 13:23:30

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Sylvia Bjorkman
3314 Cadenza Street
Greenville, NC 27858
sjbdrb@gmail.com
(252) 756-8117

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Randall and Laura Cronin \(2cronins@gmail.com\) Sent You a Personal Message](mailto:2cronins@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 28, 2021 00:01:39

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Sincerely,

Randall and Laura Cronin
615 Laurel Lake Dr Apt A242
Columbus, NC 28722
2cronins@gmail.com
(828) 894-2313

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Randall Cronin \(2cronins@gmail.com\) Sent You a Personal Message](mailto:2cronins@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 27, 2021 23:22:47

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Randall Cronin
615 Laurel Lake Dr. A 242
Columbus, NC 28722
2cronins@gmail.com
(828) 894-2313

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sallie Paar \(slpaar16@gmail.com\) Sent You a Personal Message](mailto:slpaar16@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 27, 2021 05:46:04

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Dear N.C. Division of Air Quality,

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Sincerely,

Sallie Paar
553 Lakeshore Dr
Asheville, NC 28804
slpaar16@gmail.com
(828) 253-1923

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Darrell Thompson \(curidin@earthlink.net\) Sent You a Personal Message](mailto:curidin@earthlink.net)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Sunday, September 26, 2021 17:24:28

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Dear N.C. Division of Air Quality,

Reduce coal burning power plants by investing more in wind and solar power. Scrub the coal plant exhaust to get rid of soot and other harmful inhalents.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Darrell Thompson
2616 Chapel Hill Rd., Durham NC 27707
DURHAM, NC 27707
curidin@earthlink.net
(919) 949-1281

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susan Howell \(susanhowell2@gmail.com\) Sent You a Personal Message](mailto:susanhowell2@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Sunday, September 26, 2021 16:31:24

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Dear N.C. Division of Air Quality,

Our wild places are sacred and must never be compromised. We must do everything in our national power to protect what is left, including fighting for clean air. All living things depend on it; what befalls Nature befalls humans. Thank you for doing the right thing and working for reducing pollution.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Susan Howell
513 Plymouth Drive
Greenville, NC 27858
susanhowell2@gmail.com
(252) 521-7320

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Donald Grice \(donaldgrice1@aol.com\) Sent You a Personal Message](mailto:donaldgrice1@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Sunday, September 26, 2021 15:35:54

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Dear N.C. Division of Air Quality,

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Sincerely,

Donald Grice
810 Poplar Springs Church Rd
Shelby, NC 28152
donaldgrice1@aol.com
(704) 466-8376

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Linda Heaset \(gapigipson@gmail.com\) Sent You a Personal Message](mailto:gapigipson@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Sunday, September 26, 2021 01:10:27

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Dear N.C. Division of Air Quality,

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Sincerely,

Linda Heaset
7001 Folger Dr
Charlotte, NC 28270
gapigipson@gmail.com
(704) 771-9573

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Maria LeBlanc \(yvonnemd@gmail.com\) Sent You a Personal Message](mailto:yvonnemd@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Saturday, September 25, 2021 23:16:57

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Maria LeBlanc
2600 Albemarle Ave
Raleigh, NC 27610
yvonnemd@gmail.com
(919) 809-9317

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Margaret Woods \(wpwoods19@carolina.rr.com\) Sent You a Personal Message](mailto:wpwoods19@carolina.rr.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 20:14:53

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Dear N.C. Division of Air Quality,

There is a very serious pollution issue in North Carolina which has been created by Duke Power's coal plants. All living things deserve to have clean air. Please make this a top priority as you make critical revisions to your haze plan. Thank you for your attention to this very important matter.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Margaret Woods
700 Barlang Circle
Fuquay Varina, NC, NC 27526
wpwoods19@carolina.rr.com
(704) 839-3199

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Pam McLamb \(pammclamb1016@gmail.com\) Sent You a Personal Message](mailto:pammclamb1016@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 14:11:07

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Pam McLamb
229 Tamworth Drive
Willow Spring, NC 27592
pammclamb1016@gmail.com
(919) 285-9095

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Pam McLamb \(pammclamb1016@gmail.com\) Sent You a Personal Message](mailto:pammclamb1016@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 14:07:58

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Dear N.C. Division of Air Quality,

Coal-burning power plant emissions are the biggest culprit to air quality state-wide. The data speaks volumes. We must reduce these emissions at the very least.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Pam McLamb
229 Tamworth Drive
Willow Spring, NC 27592
pammclamb1016@gmail.com
(919) 285-9095

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Florence Bernardin Fried \(flobernard69@gmail.com\) Sent You a Personal Message](mailto:flobernard69@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 11:20:37

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Dear N.C. Division of Air Quality,

Our air quality is primordial for the health of millions especially the ones with asthma, allergies and respiratory diseases! I can't believe that the State of NC isn't taking action against the coal plants that are producing soot and Nitrate oxide that are extremely dangerous! Please revise your plan to meet better standards for all the North-Carolians

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Florence Bernardin Fried
5880 Ballard St NW
Concord, NC 28027
flobernard69@gmail.com
(704) 723-6877

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [William Mays \(wcmays@charter.net\)](mailto:wcmays@charter.net) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 09:45:05

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Dear N.C. Division of Air Quality,

Close down coal burning plants. Develop hydroelectric, geothermal and solar panels under power lines.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

William Mays
15 Howland Rd
Asheville, NC 28804
wcmays@charter.net
(828) 239-9959

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Pat Carstensen \(pats1717@hotmail.com\) Sent You a Personal Message](mailto:pats1717@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Friday, September 24, 2021 06:55:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Pat Carstensen
58 Newton Drive
Durham, NC 27707
pats1717@hotmail.com
(919) 490-1566

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Margaret Thompson \(cheguagg54@gmail.com\) Sent You a Personal Message](mailto:cheguagg54@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 22:37:20

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Margaret Thompson
1011 N Buchanan Blvd
Durham, NC 27701
cheguagg54@gmail.com
(540) 293-1822

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joel Wooten \(joeltotopmountain@gmail.com\) Sent You a Personal Message](mailto:joeltotopmountain@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 22:08:41

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Sincerely,

Joel Wooten
P.O. Box 851
Yadkinville, NC 27055
joeltotopmountain@gmail.com
(336) 466-1314

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joel Wooten \(joeltotoomountain@gmail.com\) Sent You a Personal Message](mailto:joeltotoomountain@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 22:03:05

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Dear N.C. Division of Air Quality,

Clean air is good for great views!

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Sincerely,

Joel Wooten
P.O. Box 851
Yadkinville, NC 27055
joeltotoomountain@gmail.com
(336) 466-1314

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Felty \(sunnydaysgood4me51@gmail.com\) Sent You a Personal Message](mailto:sunnydaysgood4me51@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 20:19:43

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Dear N.C. Division of Air Quality,

Please take this issue seriously. I would love for my grandchildren to live in a clean environment and enjoy our National Parks and Wilderness areas pollution free.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Elizabeth Felty
93 Boxwood Lane
Brevard, NC 28712
sunnydaysgood4me51@gmail.com
(828) 577-2735

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Frazer \(frazem4@hotmail.com\) Sent You a Personal Message](mailto:frazem4@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 19:54:49

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Dear N.C. Division of Air Quality,

We need to protect parks and people - let's clean up the air pollution!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mary Frazer
1716 Evergreen Ave
Raleigh, NC 27603
frazem4@hotmail.com
(919) 829-4210

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Keith Johnson \(kmjohnso15@hotmail.com\) Sent You a Personal Message](mailto:kmjohnso15@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 16:40:02

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Keith Johnson
810 Buckner SpringsRoad
Siler City, NC 27344
kmjohnso15@hotmail.com
(919) 742-9953

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Connie Toops \(toopsphotoj@msn.com\) Sent You a Personal Message](mailto:toopsphotoj@msn.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 16:35:40

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Connie Toops
774 Wilson Cove Branch Rd
Marshall, NC 28753
toopsphotoj@msn.com
(828) 649-3275

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Michelle Hunter \(quabbin@yahoo.com\) Sent You a Personal Message](mailto:quabbin@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 16:22:25

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Dear N.C. Division of Air Quality,

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Sincerely,

Michelle Hunter
6501 Wooden Shoe Ln
Raleigh, NC 27613
quabbin@yahoo.com
(919) 785-0000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Michael Eisenberg \(mikeeeisen@zoho.com\) Sent You a Personal Message](mailto:mikeeeisen@zoho.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 15:34:20

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Sincerely,

Michael Eisenberg
2326 Carriage Oaks Dr
Raleigh, NC 27614
mikeeeisen@zoho.com
(312) 371-1447

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jon Pitt \(jon.pitt@aa.com\) Sent You a Personal Message](mailto:jon.pitt@aa.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 14:56:59

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jon Pitt
2011 Ford Gates Dr.
Garner, NC 27529
jon.pitt@aa.com
(919) 961-8484

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Richard Piatkowski \(keeperp77@hotmail.com\) Sent You a Personal Message](mailto:keeperp77@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 14:50:23

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Dear N.C. Division of Air Quality,

Protect our environment for current and future generations.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Richard Piatkowski
2524 Wheeler Bluff Dr
Raleigh, NC 27606
keeperp77@hotmail.com
(919) 852-4888

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susane Boukamel \(stelliboukamel@gmail.com\) Sent You a Personal Message](mailto:stelliboukamel@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 12:15:40

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Dear N.C. Division of Air Quality,

You mustn't discount the dirtiest and deadliest emissions of soot and nitrogen oxide which come from coal fired plants. Duke must be held responsible and you need to protect our health and lungs from breathing these contaminants! Otherwise, we can only conclude the drafters of this bill have a vested interest in allowing Duke to continue to emit these noxious substances at our expense!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Susane Boukamel
200 Fox View Place
Cary, NC 27511
stelliboukamel@gmail.com
(919) 439-2468

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rosa Arias \(newyorkarias@aol.com\) Sent You a Personal Message](mailto:RosaArias@newyorkarias@aol.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 09:23:23

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<<mailto:report.spam@nc.gov>>

Dear N.C. Division of Air Quality,

Clean air and healthy lungs are essential! You need to take action now!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Rosa Arias
1212 FOREST BLUFF DR
MIDLAND, NC 28107
newyorkarias@aol.com
(704) 421-6272

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Suzanne O'Connell \(suzanneoconnell@hotmail.com\) Sent You a Personal Message](mailto:suzanneoconnell@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 08:54:23

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Dear N.C. Division of Air Quality,

Clean air and water are essential to our humans and the environment at large. Please do your utmost to protect these shared resources for current and future generations. It is astounding to imagine visiting a national park or other natural areas and being surrounded by poor air quality.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Suzanne O'Connell
118 swan quarter drive
Cary, NC 27519
suzanneoconnell@hotmail.com
(919) 609-1498

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Claudia Kaplan \(kaplans@nc.rr.com\) Sent You a Personal Message](mailto:kaplans@nc.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 08:45:41

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Claudia Kaplan
4911 Victoria Dr
Simon, NC 27713
kaplans@nc.rr.com
(919) 932-9635

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Christine Voss \(christinemvoss@gmail.com\) Sent You a Personal Message](mailto:ChristineVoss@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 08:44:41

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Dear N.C. Division of Air Quality,

North Carolinians experience numerous climate challenges. We NEED to use our natural assets to improve air quality and improve air quality to sustain these natural assets that protect us for years to come. North Carolina's draft Haze Rule plan ignores the largest and dirtiest sources of air pollution: coal-burning power plants. It also excludes soot and nitrogen oxides, two of the deadliest air pollutants. As a result, North Carolina's plan does not result in any new emissions reductions. Let's change this!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Christine Voss
106 Locust Ct.
Pine Knoll Shores, NC 28512
christinemvoss@gmail.com
(252) 717-3890

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [valerie.rabeler \(ligtonc@gmail.com\) Sent You a Personal Message](mailto:valerie.rabeler@ligtonc@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 08:01:03

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Dear N.C. Division of Air Quality,

North Carolina's draft Haze Rule plan ignores the largest and dirtiest sources of air pollution: coal-burning power plants. It also excludes soot and nitrogen oxides, two of the deadliest air pollutants. As a result, North Carolina's plan does not result in any new emissions reductions. This is unacceptable.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

valerie.rabeler
211 W BOUNDARY ST
CARY, NC 27513
ligtonc@gmail.com
(919) 818-2765

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Frances Moore \(wmoore2395@aol.com\) Sent You a Personal Message](mailto:wmoore2395@aol.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 07:47:45

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Dear N.C. Division of Air Quality,

Please protect our parks and all of our lands!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Frances Moore
4303 eno cemetery rd
Cedar Grove, NC 28445
wmoore2395@aol.com
(910) 541-0470

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Shaun Murphy \(pnuash8@gmail.com\) Sent You a Personal Message](mailto:pnuash8@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 07:35:44

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Dear N.C. Division of Air Quality,

It's a shame that we can't just do the right thing. We need to ELIMINATE coal burning plants. Alternative energy is available and affordable. Stop Duke from continuing to destroy our environment for short term profit.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Shaun Murphy
4613 Dow court
Fayetteville, NC 28314
pnuash8@gmail.com
(508) 816-6437

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Annie Dude \(annie.dude@gmail.com\) Sent You a Personal Message](mailto:annie.dude@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 07:25:56

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Dear N.C. Division of Air Quality,

I am a recent transplant to North Carolina - we moved here in part because of the natural beauty and outdoor recreation opportunities in the state, especially in the mountains. Please do not exempt coal fired power plants from these new regulations.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Annie Dude
117 Hotelling Ct
Chapel Hill, NC 27514
annie.dude@gmail.com
(312) 498-5852

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [J S \(jillslee@aol.com\) Sent You a Personal Message](mailto:jillslee@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 07:01:45

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Dear N.C. Division of Air Quality,

No more burning carbon to pollute our air and heat our climate! Shut down all coal and gas fossil fuel plants!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

J S
14535 Harmonious St
Charlotte, NC 28278
jillslee@aol.com
(704) 643-9035

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lori Bright \(britespirit1@yahoo.com\) Sent You a Personal Message](mailto:britespirit1@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 06:42:36

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Dear N.C. Division of Air Quality,

Duke always wants to put their pollution on consumers. Absolutely no!!!!

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Sincerely,

Lori Bright
75 Hickory Tree Rd, Apt E
Asheville, NC 28805
britespirit1@yahoo.com
(828) 699-7924

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [BRIDGET J DUNFORD \(purpledog@hughes.net\) Sent You a Personal Message](mailto:BRIDGET.J.DUNFORD@hughes.net)
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 06:15:22

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Dear N.C. Division of Air Quality,

Protect our air and our environment for The People!

Decrease coal plants and increase renewable energy sources.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

BRIDGET J DUNFORD
525 Patton Valley Dr
Nebo, NC 28761
purpledog@hughes.net
(828) 442-0790

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Linda Eastman \(lindaeastman1948@gmail.com\) Sent You a Personal Message](mailto:lindaeastman1948@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 05:49:14

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Dear N.C. Division of Air Quality,

There has never been a better time to invest in clean air than now. Technologies to replace coal generating power plants exist and produce power at much less cost than coal. Particulate matter pollution sickens many lives each year. I am tired of paying for power that sickens me and the environment.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Linda Eastman
7048 Sevilleen Dr SW
Ocean Isl Bch, NC 28469
lindaeastman1948@gmail.com
(201) 321-0817

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joanne McGrath \(everythingchanges41905@gmail.com\) Sent You a Personal Message](mailto:everythingchanges41905@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Thursday, September 23, 2021 01:57:14

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Joanne McGrath
924 Chestnut Cove Rd
Sylva, NC 28779
everythingchanges41905@gmail.com
(828) 631-1572

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Barbara Benson \(barbbenson@ec.rr.com\) Sent You a Personal Message](mailto:barbbenson@ec.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 23:24:50

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Barbara Benson
104 Deerfield Court
Cedar Point, NC 28584
barbbenson@ec.rr.com
(252) 393-6495

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Traci Hamilton \(mcnham@gmail.com\) Sent You a Personal Message](mailto:mcnham@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 22:35:18

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Dear N.C. Division of Air Quality,

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Sincerely,

Traci Hamilton
3328 Chalmers Dr
wilmington, NC 28409
mcnham@gmail.com
(704) 458-7239

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Marla West \(marly2054@aol.com\) Sent You a Personal Message](mailto:marly2054@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 22:34:10

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Dear N.C. Division of Air Quality,

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Sincerely,

Marla West
81 wild cherry road
Asheville, NC 28804
marly2054@aol.com
(505) 604-1167

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joe Bearden \(chickadeebirders@outlook.com\) Sent You a Personal Message](mailto:chickadeebirders@outlook.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 21:37:59

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Dear N.C. Division of Air Quality,

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Sincerely,

Joe Bearden
1809 Lakepark Drive
Raleigh, NC 27612
chickadeebirders@outlook.com
(919) 844-9050

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Jeffrey \(snowbanks2@yahoo.com\) Sent You a Personal Message](mailto:snowbanks2@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 21:36:49

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Dear N.C. Division of Air Quality,

Excessive growth is harming our environment, ecosystem and wildlife habitats and the increasing excessive amount of trash on the roadsides is alarming

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mary Jeffrey
1381 River Club Ridge
Lenoir, NC 28645
snowbanks2@yahoo.com
(206) 465-8296

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [m wooley \(lorettas@mtnarea.net\) Sent You a Personal Message](mailto:m_wooley@mtnarea.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 21:21:42

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

m wooley
124 college
asheville, NC 28801
lorettas@mtnarea.net
(828) 252-8842

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rebecca Burmester \(rebeccaburmester@gmail.com\) Sent You a Personal Message](mailto:rebeccaburmester@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 21:02:42

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Dear N.C. Division of Air Quality,

Neither coal nor fracked natural gas are good for the air we breathe.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Rebecca Burmester
2121 North Hills Dr Apt I
Raleigh, NC 27612
rebeccaburmester@gmail.com
(919) 395-1373

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Karen Fulkerson \(annie@riverdaze.com\) Sent You a Personal Message](mailto:annie@riverdaze.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:54:15

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Karen Fulkerson
505 Oak Creek Rd
Franklin, NC 28734
annie@riverdaze.com
(828) 634-4218

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Alice Wieting \(awieting1@yahoo.com\) Sent You a Personal Message](mailto:awieting1@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:34:35

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Dear N.C. Division of Air Quality,

I care about the quality of the air we all breathe. Coal pollutes our environment and our lungs.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Alice Wieting
2949 Deepwoods dr
Burlington, NC 27215
awieting1@yahoo.com
(336) 437-6242

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Micah McLain \(micah.mclain@gmail.com\) Sent You a Personal Message](mailto:micah.mclain@gmail.com)
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:31:22

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Dear N.C. Division of Air Quality,

Please edit the Haze Rule plan to include the largest and dirtiest sources of air pollution: coal-burning power plants. Please also include soot and nitrogen oxides, two of the deadliest air pollutants.

Thank you,
Micah

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Micah McLain
97 Virginia Ave
Asheville, NC 28806
micah.mclain@gmail.com
(404) 626-6233

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [George Phillips \(nctrack@gmail.com\) Sent You a Personal Message](mailto:nctrack@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:27:38

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

George Phillips
1140 Carousel Ln
Hendersonville, NC 28792
nctrack@gmail.com
(999) 999-9999

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [WJ Richardson \(wjr131@gmail.com\) Sent You a Personal Message](mailto:wjr131@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:24:06

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Dear N.C. Division of Air Quality,

Please protect our scenery by controlling air pollution.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

WJ Richardson
3712 Bryn Mawr Ct
Raleigh, NC 27606
wjr131@gmail.com
(919) 851-4725

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Brent Koenig \(cgirt@yahoo.com\) Sent You a Personal Message](mailto:cgirt@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:11:47

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Dear N.C. Division of Air Quality,

I know you would want your family and loved ones to have the cleanest air to breathe, just as I do. The negative health effects of dirty air, largely caused by the burning of fossil fuels, is undeniable. Please take a leading role in curtailing these emissions so current and future generations can more fully enjoy the beautiful places in our state.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Brent Koenig
7 Coleman Street
Weaverville, NC 28787
cgirt@yahoo.com
(619) 847-8528

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Adrian Smith \(adsmith57@charter.net\) Sent You a Personal Message](mailto:adsmith57@charter.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 20:11:25

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Dear N.C. Division of Air Quality,

We need to protect citizens and not corporations!

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Sincerely,

Adrian Smith
PO Box 265 (110 Jones St)
moncure, NC 27559
adsmith57@charter.net
(919) 542-3807

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Marco Peters \(tonypetersdc@gmail.com\) Sent You a Personal Message](mailto:tonypetersdc@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 19:56:52

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Dear N.C. Division of Air Quality,

Clean air is a public issue. Business leaders must be held accountable for any pollution. I trust our politicians will find real solutions that protect the public, public lands and provide sustainable solutions for business as well.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Marco Peters
7100 Park Road
Charlotte, NC 28210
tonypetersdc@gmail.com
(704) 728-1496

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ulrich Alsentzer \(ualsentzer@rsnet.org\) Sent You a Personal Message](mailto:ualsentzer@rsnet.org)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 19:50:38

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Dear N.C. Division of Air Quality,

We need ZERO fossil fuel combustion of any kind by 2030 the latest, if we want this planet to survive.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Ulrich Alsentzer
103 Cabna Rd
Ulrich, NC 27810
ualsentzer@rsnet.org
(252) 964-4624

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [William Garrard \(wgarrardjr@gmail.com\) Sent You a Personal Message](mailto:wgarrardjr@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 19:43:30

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

William Garrard
472 22nd Ave NE
Hickory, NC 28601
wgarrardjr@gmail.com
(828) 962-7566

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Donelle Kerns \(donellkerns@gmail.com\) Sent You a Personal Message](mailto:donellkerns@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 19:39:56

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Donelle Kerns
123 Circadian Way
Chapel Hill, NC 27516
donellkerns@gmail.com
(919) 942-8483

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Daniel Graham \(grahamdn@bellsouth.net\) Sent You a Personal Message](mailto:daniel.graham@bellsouth.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 19:20:03

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Dear N.C. Division of Air Quality,

Honor the legacies of John Muir and TR!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Daniel Graham
123 Grace Ave.
Chaple Hill, NC 27517
grahamdn@bellsouth.net
(919) 942-1759

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Angela Vieth \(azvieth@earthlink.net\) Sent You a Personal Message](mailto:azvieth@earthlink.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 17:39:09

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Angela Vieth
3009 Bexley Ave
Durham, NC 27707
azvieth@earthlink.net
(919) 403-7103

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mariah Mitchell \(pbsminds@gmail.com\) Sent You a Personal Message](mailto:pbsminds@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 17:04:18

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Dear N.C. Division of Air Quality,

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Sincerely,

Mariah Mitchell
942 N Wind Dr
Winston Salem, NC 27127
pbsminds@gmail.com
(336) 970-0465

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Mcqueen \(meminavl@yahoo.com\) Sent You a Personal Message](mailto:meminavl@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 16:25:14

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Dear N.C. Division of Air Quality,

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Sincerely,

Mary Mcqueen
171 Inglenook Rd
Hendersonville, NC 28792
meminavl@yahoo.com
(828) 545-9010

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Nancy Kondracki \(nancykondracki13@gmail.com\) Sent You a Personal Message](mailto:nancykondracki13@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 14:44:41

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Nancy Kondracki
5211 Flintrock Ct
Greensboro, NC 27455
nancykondracki13@gmail.com
(336) 282-9558

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Meredith Arkin \(meredith.arkin@gmail.com\) Sent You a Personal Message](mailto:meredith.arkin@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 14:40:47

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Meredith Arkin
613 Woodvale Dr
Greensboro, NC 27410
meredith.arkin@gmail.com
(336) 294-0207

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tammi Erving-Mengel \(tervingmengel@yahoo.com\) Sent You a Personal Message](mailto:tervingmengel@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 14:09:17

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Dear N.C. Division of Air Quality,

We all need to do better, be better to save our planet for the next generationations!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Tammi Erving-Mengel
6118 Branson Davis Rd
Randleman, NC 27317
tervingmengel@yahoo.com
(336) 434-5496

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Goodkind \(mary@lindleyg.com\) Sent You a Personal Message](mailto:mary@lindleyg.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 12:14:16

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mary Goodkind
23 Ridgefield Pl
Asheville, NC 28803
mary@lindleyg.com
(828) 424-7151

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Diane Arbour \(dcarbour@hotmail.com\) Sent You a Personal Message](mailto:dcarbour@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 10:58:45

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Dear N.C. Division of Air Quality,

We have to protect our land now before it is too late.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Diane Arbour
3409 6th Street Dr NW
Hickory, NC 28601
dcarbour@hotmail.com
(828) 381-0111

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Thomas Taylor \(tnt2703@yahoo.com\) Sent You a Personal Message](mailto:tnt2703@yahoo.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 10:00:52

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Thomas Taylor
3609 Crosstimbers Dr
Greensboro, NC 27410
tnt2703@yahoo.com
(336) 278-1707

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Brian Burwell \(brianburwell@randomsongoftheday.org\) Sent You a Personal Message](mailto:brianburwell@randomsongoftheday.org)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 09:41:21

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Sincerely,

Brian Burwell
PO Box 52342
Durham, NC 27717
brianburwell@randomsongoftheday.org
(815) 450-9696

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sue E Feldkamp \(sefeldkamp2@juno.com\) Sent You a Personal Message](mailto:sefeldkamp2@juno.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 09:32:28

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Sincerely,

Sue E Feldkamp
360 Harrison Ave Apt 202C
Franklin, NC 28734
sefeldkamp2@juno.com
(828) 507-0532

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Erin Dalpe \(emdalpe683@gmail.com\) Sent You a Personal Message](mailto:emdalpe683@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Wednesday, September 22, 2021 01:23:21

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Dear N.C. Division of Air Quality,

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Sincerely,

Erin Dalpe
120 Saint Albans Dr
Raleigh, NC 27609
emdalpe683@gmail.com
(919) 803-2156

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Steve Copulsky \(scopulsky@mindspring.com\) Sent You a Personal Message](mailto:scopulsky@mindspring.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 22:52:21

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Dear N.C. Division of Air Quality,

Personally, I love to hike in our beautiful North Carolina mountains and I want to enjoy clean air in those mountains.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Steve Copulsky
6614 Lynn Ave
Charlotte, NC 28226
scopulsky@mindspring.com
(704) 543-7493

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Shoshana Serxner-Merchant \(sserxner1124@att.net\) Sent You a Personal Message](mailto:sserxner1124@att.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 22:15:55

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Dear N.C. Division of Air Quality,

North Carolina is a sunshine state and there should be many more solar panels.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Shoshana Serxner-Merchant
705 Dixie Trl
Raleigh, NC 27607
sserxner1124@att.net
(919) 834-9406

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jamie Murphy \(jamielmurphy@hotmail.com\) Sent You a Personal Message](mailto:jamielmurphy@hotmail.com)
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 22:05:48

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Dear N.C. Division of Air Quality,

Please protect our beautiful parks for all our citizens to enjoy, and to save our natural environment and home for all plants and wildlife.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jamie Murphy
66 Quanv Ct
Brevard, NC 28712
jamielmurphy@hotmail.com
(828) 966-8515

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Christine Payden-Travers \(paydentravers@verizon.net\) Sent You a Personal Message](mailto:paydentravers@verizon.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 19:51:55

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Christine Payden-Travers
108 E Devonshire St
Winston Salem, NC 27127
paydentravers@verizon.net
(434) 384-4744

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cynthia Mastro \(utvol61@inteliport.com\) Sent You a Personal Message](mailto:utvol61@inteliport.com)
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 18:21:30

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Dear N.C. Division of Air Quality,

I have been enjoying the NC mountains for almost 70 years; as a child, the Great Smoky Mountains had far less haze and pollution than now. There are cost effective ways to minimize that pollution, so require companies like Duke Energy to o clean up their act.

I write today because I deeply value our nation?s wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cynthia Mastro
101 Hunters Trl W
Elizabeth City, NC 27909
utvol61@inteliport.com
(252) 338-2708

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jim Haaga \(jimhaaga@gmail.com\) Sent You a Personal Message](mailto:jimhaaga@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 18:18:03

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Dear N.C. Division of Air Quality,

As a resident of Yancey County, home of Mt. Mitchell, I see firsthand the damage air pollution has done to that beautiful ecosystem. We need vigorous pollution controls in our state to try to reverse this and further damage. Clean air is a vital resource we need to be able to pass on to the next generation. Thank you,
Sincerely,
Jim Haaga, Burnsville

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jim Haaga
311 Robertson St
Burnsville, NC 28714
jimhaaga@gmail.com
(828) 284-4124

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kathy Miller \(km22@outlook.com\) Sent You a Personal Message](mailto:km22@outlook.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 17:54:22

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Kathy Miller
224 Spring Shore Rd
Statesville, NC 28677
km22@outlook.com
(704) 657-1787

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [William Blaine \(wkblaine@gmail.com\) Sent You a Personal Message](mailto:wkblaine@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 17:47:43

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Sincerely,

William Blaine
1209 Litchborough Way
Wake Forest, NC 27587
wkblaine@gmail.com
(919) 395-5975

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Julia Young \(mandjyoung@mindspring.com\) Sent You a Personal Message](mailto:mandjyoung@mindspring.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 17:42:16

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Dear N.C. Division of Air Quality,

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Sincerely,

Julia Young
457 Meadow Branch Rd
Pittsboro, NC 27312
mandjyoung@mindspring.com
(919) 933-1433

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Suzanne Dickson \(szpressroom@yahoo.com\) Sent You a Personal Message](mailto:szpressroom@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 17:21:45

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Dear N.C. Division of Air Quality,

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Sincerely,

Suzanne Dickson
PO Box 1081
Sneads Ferry, NC 28460
szpressroom@yahoo.com
(603) 702-2001

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Laurie Pearson \(laupry@aol.com\) Sent You a Personal Message](mailto:laupry@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 16:18:40

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Dear N.C. Division of Air Quality,

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Sincerely,

Laurie Pearson
147 Coronilla Rd
Mooresville, NC 28117
laupry@aol.com
(970) 214-8719

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joyce Pusel \(joyce.pusel@gmail.com\) Sent You a Personal Message](mailto:joyce.pusel@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 16:12:34

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Dear N.C. Division of Air Quality,

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Sincerely,

Joyce Pusel
15 Vauxhall Pl
Chapel Hill, NC 27517
joyce.pusel@gmail.com
(919) 475-1014

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jane Brody \(janekb@aol.com\) Sent You a Personal Message](mailto:janekb@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 15:59:48

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Dear N.C. Division of Air Quality,

save our parks

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jane Brody
3500 Amber Dr
Wilmington, NC 28409
janekb@aol.com
(516) 851-7166

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tim Wadkins \(timwadkins@gmail.com\) Sent You a Personal Message](mailto:timwadkins@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 15:52:42

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Dear N.C. Division of Air Quality,

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Sincerely,

Tim Wadkins
9100 Linslade Way
Wake Forest, NC 27587
timwadkins@gmail.com
(484) 786-3392

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lenore Guidoni \(lguidoni@frontier.com\) Sent You a Personal Message](mailto:lguidoni@frontier.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 15:44:23

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Dear N.C. Division of Air Quality,

I am very disappointed that the plan being looked at under the Regional Haze Rule is not sufficient to put a dent in our growing problem with poor air quality in North Carolina and specifically in our national parks. There is no reason for this to happen in a State where there is so much technical and professional expertise in this area. Please do the right things right and stop ignoring Duke Energy's coal plants.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lenore Guidoni
410 Chatham Glen Dr
Durham, NC 27713
lguidoni@frontier.com
(919) 544-2868

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Andra Eich \(andraeich@hotmail.com\) Sent You a Personal Message](mailto:andraeich@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 15:15:35

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Andra Eich
3263 Grandview Club Rd
Pfafftown, NC 27040
andraeich@hotmail.com
(336) 813-3109

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lee Rynearson \(lee.rynearson@gmail.com\) Sent You a Personal Message](mailto:lee.rynearson@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 15:10:57

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Dear N.C. Division of Air Quality,

An air quality improvement plan should have improvements in it - particulates kill people and as technology and the means for everyone to breathe cleaner air improve, we should be reducing the hazards to health and view by reducing particulates.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lee Rynearson
1047 Keith Hills Rd
Lillington, NC 27546
lee.rynearson@gmail.com
(765) 250-7592

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Nancy Cason \(nancylcason@gmail.com\) Sent You a Personal Message](mailto:nancylcason@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 14:37:02

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Nancy Cason
509 Suttons Walk Dr
Cary, NC 27513
nancylcason@gmail.com
(301) 980-5463

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jody Vaughan \(jodyvaughan72@gmail.com\) Sent You a Personal Message](mailto:jodyvaughan72@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 14:18:40

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Dear N.C. Division of Air Quality,

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Sincerely,

Jody Vaughan
4208 Bluffs Ln
Durham, NC 27712
jodyvaughan72@gmail.com
(919) 943-9796

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Deborah Milkowski \(debmilkowski@centurylink.net\) Sent You a Personal Message](mailto:debmilkowski@centurylink.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 14:17:55

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Dear N.C. Division of Air Quality,

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Sincerely,

Deborah Milkowski
573 Deer Run Rd
New Bern, NC 28562
debmilkowski@centurylink.net
(252) 571-4330

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susane Boukamel \(stelliboukamel@gmail.com\) Sent You a Personal Message](mailto:stelliboukamel@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 14:16:13

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Sincerely,

Susane Boukamel
200 Fox View Pl
Cary, NC 27511
stelliboukamel@gmail.com
(919) 439-2468

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Christy Jenkins \(bamboo_marbles@hotmail.com\) Sent You a Personal Message](mailto:bamboo_marbles@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 14:05:52

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Sincerely,

Christy Jenkins
239 Riverwood Dr
Hertford, NC 27944
bamboo_marbles@hotmail.com
(252) 339-2032

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [James Zizzo \(jzizzo@ec.rr.com\) Sent You a Personal Message](mailto:jzizzo@ec.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:56:22

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Sincerely,

James Zizzo
2304 Wrightsville Ave
Wilmington, NC 28403
jzizzo@ec.rr.com
(910) 762-6218

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Monica Sanchez \(monica.northcarolina@yahoo.com\) Sent You a Personal Message](mailto:monica.northcarolina@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:54:00

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Dear N.C. Division of Air Quality,

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Sincerely,

Monica Sanchez
64 Cedar Hills Cir
Chapel Hill, NC 27514
monica.northcarolina@yahoo.com
(919) 968-6115

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Donald Harland \(dharland@bellsouth.net\) Sent You a Personal Message](mailto:ddharland@bellsouth.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:45:31

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Dear N.C. Division of Air Quality,

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Sincerely,

Donald Harland
PO Box 2080, 677 N Luther Rd
Candler, NC 28715
dharland@bellsouth.net
(828) 665-9247

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jill Gooch \(goochj@ecu.edu\) Sent You a Personal Message](mailto:goochj@ecu.edu)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:29:42

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Dear N.C. Division of Air Quality,

Shut down the coal fired plants! Stop this bad air pollution and give ourselves and future generations clean air!
Thank you.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jill Gooch
2147 Hyde Dr
Greenville, NC 27858
goochj@ecu.edu
(252) 341-8536

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jeff Botz \(jeffbotz@gmail.com\) Sent You a Personal Message](mailto:jeffbotz@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:17:50

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Dear N.C. Division of Air Quality,

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Sincerely,

Jeff Botz
404 S College St Apt A
Monroe, NC 28112
jeffbotz@gmail.com
(980) 290-9795

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Anna Chott \(anna@sustainablesandhills.org\) Sent You a Personal Message](mailto:anna@sustainablesandhills.org)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:17:03

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Dear N.C. Division of Air Quality,

Globally, air pollution kills 7 million people per year, more than twice the deaths from Covid to date. This is our chance to reduce some of the deadliest emissions and move our country toward the path to clean energy.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Anna Chott
1861 Tryon Dr Unit 3
Fayetteville, NC 28303
anna@sustainablesandhills.org
(314) 608-4130

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sigrid Hice \(bookartist1450@yahoo.com\) Sent You a Personal Message](mailto:bookartist1450@yahoo.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:14:09

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Dear N.C. Division of Air Quality,

In addition to valuing wilderness areas, national parks, and the wildlife everywhere, I am also concerned for the health of my children, grandchildren, and my own health. Some of my family members and I suffer with asthma, and my asthma symptoms have been exacerbated during summer months when pollution from particulate matter has been high. We spend much time outdoors exercising, hiking, and gardening, and as a taxpayer, I expect you to do your job wisely and protect our health by including stricter clean air regulations to ensure better air and water quality.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Sigrid Hice
1450 Lillian Lane
Hickory, NC 28602
bookartist1450@yahoo.com
(828) 638-4455

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Alaina Norzagaray \(alainan72@gmail.com\) Sent You a Personal Message](mailto:alainan72@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 13:00:50

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Sincerely,

Alaina Norzagaray
102 Swiss Stone Ct
Cary, NC 27513
alainan72@gmail.com
(919) 576-7548

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tom Leonard \(leonardtm@gmail.com\) Sent You a Personal Message](mailto:leonardtm@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:36:53

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Tom Leonard
551 Cobbs Creek Rd
Boone, NC 28607
leonardtm@gmail.com
(828) 268-0945

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Aimee Quillen \(qfolksmom@gmail.com\) Sent You a Personal Message](mailto:Aimee.Quillen@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:31:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Aimee Quillen
273 Terrapin Trl
Whittier, NC 28789
qfolksmom@gmail.com
(828) 331-0446

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [John Parker \(parker@fiu.edu\) Sent You a Personal Message](#)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:17:40

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Dear N.C. Division of Air Quality,

The health of Our forests will play a crucial role in reducing global heating.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

John Parker
222 Lovely Ln
Asheville, NC 28803
parker@fiu.edu
(828) 286-2515

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Paula Stober \(paula@bucklen.com\) Sent You a Personal Message](mailto:paula@bucklen.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:12:13

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Dear N.C. Division of Air Quality,

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Sincerely,

Paula Stober
3607 Timberoak Dr
Greensboro, NC 27410
paula@bucklen.com
(336) 288-2777

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Renee Skudra \(renees52@aol.com\) Sent You a Personal Message](mailto:renees52@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:08:50

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Renee Skudra
3806 Manor Dr
Greensboro, NC 27403
renees52@aol.com
(510) 277-7157

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ann Bullock \(akbullock2@gmail.com\) Sent You a Personal Message](mailto:akbullock2@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:06:40

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Dear N.C. Division of Air Quality,

I have lived in NC for 31 years and regularly use NC parks--please ensure the state's air quality plan does everything possible to protect them.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Ann Bullock
PO Box 1266
Whittier, NC 28789
akbullock2@gmail.com
(828) 788-4472

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Gary Parker \(garypkr55@gmail.com\) Sent You a Personal Message](mailto:garypkr55@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:02:25

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Dear N.C. Division of Air Quality,

I've lived in NC for over fifty years. I've seen the changes in our mountain forests which have been harmed by air pollution and turned brown in many areas compared to fifty years ago. I hike trails in the Great Smokey Mountains National Park, Shining Rock Wilderness and Cold Mountain, the amazing and beautiful Linville Gorge, Mt. Mitchell State Park, and Grandfather Mountain, among others. These precious natural resources need air free from pollution and deserve our utmost efforts to protect them. Please strengthen the Regional Haze plan and help keep NC a premier destination for visiting those beautiful natural resources.

Gary Parker
500 Rand Blvd
Archdale NC 27263

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Gary Parker
500 Rand Blvd
Archdale, NC 27263
garypkr55@gmail.com
(336) 689-5828

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cynthia Smith \(cynthia.smith@sierraclub.org\)](mailto:cynthia.smith@sierraclub.org) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 12:01:41

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Dear N.C. Division of Air Quality,

Please protect the air we breathe. There is no downside!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cynthia Smith
505 Spring Valley Dr
Raleigh, NC 27609
cynthia.smith@sierraclub.org
(919) 274-0542

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Wendy Waugh \(rev.wendywaugh@gmail.com\) Sent You a Personal Message](mailto:rev.wendywaugh@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 11:31:00

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Dear N.C. Division of Air Quality,

When you disrespect the earth, the earth punishes you! Clean air is essential to saving the endangered human species.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Wendy Waugh
22 Bushmill Ct
Hillsborough, NC 27278
rev.wendywaugh@gmail.com
(919) 477-6524

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kathy Orms \(kathy.orms@gmail.com\) Sent You a Personal Message](mailto:kathy.orms@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 11:29:19

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Dear N.C. Division of Air Quality,

I have a number of friends with breathing problems. The current proposal needs to be strengthened to eliminate the pollution from coal plants. Please help protect our vulnerable citizens!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Kathy Orms
327 Riverwood Dr
Lewisville, NC 27023
kathy.orms@gmail.com
(630) 988-1853

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jessica Kellam \(jkellam16@yahoo.com\) Sent You a Personal Message](mailto:jkellam16@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 11:25:43

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Dear N.C. Division of Air Quality,

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Sincerely,

Jessica Kellam
202 Ashland Dr Apt A
Greensboro, NC 27403
jkellam16@yahoo.com
(336) 809-1515

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Deborah Swanson \(dswanson@aol.com\) Sent You a Personal Message](mailto:dswanson@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 11:18:09

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Dear N.C. Division of Air Quality,

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Sincerely,

Deborah Swanson
568 Garren Creek Rd
Fairview, NC 28730
dswanson@aol.com
(828) 628-4878

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Dwight Koeberl \(dwight.koeberl@gmail.com\) Sent You a Personal Message](mailto:dwight.koeberl@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 11:03:48

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Dear N.C. Division of Air Quality,

As a pediatrician who frequently visits Shining Rock Wilderness, I know that this is an important problem to address at this time.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Dwight Koeberl
606 E Forest Hills Blvd
Durham, NC 27707
dwight.koeberl@gmail.com
(919) 403-3389

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Peggy Rainey \(pebreheim@hotmail.com\) Sent You a Personal Message](mailto:pebreheim@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:59:16

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Peggy Rainey
4894 Scythe Ct
Julian, NC 27283
pebreheim@hotmail.com
(336) 215-3214

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Glenn Rape \(glennrape@earthlink.net\) Sent You a Personal Message](mailto:Glenn.Rape@earthlink.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:50:15

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Dear N.C. Division of Air Quality,

North Carolina is home to unique and treasured wild places. From the peaks of Great Smoky Mountains National Park and Shining Rock Wilderness to the coast of Swanquarter National Wildlife Refuge, these areas deserve care and protection.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Glenn Rape
2921 Aprilia Ln
Monroe, NC 28112
glennrape@earthlink.net
(704) 764-4459

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ray Hearne \(rayforpeace@yahoo.com\) Sent You a Personal Message](mailto:rayforpeace@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:24:44

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Dear N.C. Division of Air Quality,

We all need clean air for good health! Haze and air pollution kills all creatures and discourages tourism.

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Sincerely,

Ray Hearne
91 Bald Creek Rd
Leicester, NC 28748
rayforpeace@yahoo.com
(828) 683-4322

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Valerie Booze \(valerie.booze@gmail.com\) Sent You a Personal Message](mailto:valerie.booze@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:22:07

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Dear N.C. Division of Air Quality,

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Sincerely,

Valerie Booze
5133 Long Pointe Rd
Wilmington, NC 28409
valerie.booze@gmail.com
(720) 737-9967

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Brentlee Poston \(brentlee.poston@gmail.com\) Sent You a Personal Message](mailto:brentlee.poston@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:21:55

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Sincerely,

Brentlee Poston
123 Forest Hill Dr
Asheville, NC 28803
brentlee.poston@gmail.com
(864) 993-7626

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Donald Smyth \(donaldsmyth@mindspring.com\) Sent You a Personal Message](mailto:donaldsmyth@mindspring.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 10:20:33

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Sincerely,

Donald Smyth
320 Kenmure Dr
Flat Rock, NC 28731
donaldsmyth@mindspring.com
(704) 974-9805

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Dennis Wilkerson \(dcw-be-orders92@dcwilkerson.net\) Sent You a Personal Message](mailto:dcw-be-orders92@dcwilkerson.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:59:46

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Dear N.C. Division of Air Quality,

Coal power plants can be cleaned up with tougher scrubbers on the smoke stacks

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Dennis Wilkerson
3510 Weatherby Dr
Durham, NC 27703
dcw-be-orders92@dcwilkerson.net
(919) 598-3763

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Adam Crocker \(acrocker23@gmail.com\) Sent You a Personal Message](mailto:acrocker23@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:49:29

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Dear N.C. Division of Air Quality,

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Sincerely,

Adam Crocker
200 Juniper Creek Blvd
Pinehurst, NC 28374
acrocker23@gmail.com
(910) 690-6844

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cheryl Kellogg \(dancingwithwind11@gmail.com\) Sent You a Personal Message](mailto:dancingwithwind11@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:46:36

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Dear N.C. Division of Air Quality,

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Sincerely,

Cheryl Kellogg
PO Box 652
Fairview, NC 28730
dancingwithwind11@gmail.com
(305) 509-1304

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [John and Cathy Thomas \(frog.pond@mindspring.com\) Sent You a Personal Message](mailto:frog.pond@mindspring.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:41:45

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Dear N.C. Division of Air Quality,

I remember how much the air quality and visibility improved when then Attorney General Cooper successfully stopped TVA's power plant pollution. It's high time our own state of North Carolina did the same.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

John and Cathy Thomas
907 Tanglewood Dr
Cary, NC 27511
frog.pond@mindspring.com
(919) 460-8909

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Julienne Johnson \(bjjohnson118@hotmail.com\) Sent You a Personal Message](mailto:jbjohnson118@hotmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:34:48

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Dear N.C. Division of Air Quality,

Preserving and protecting our state and national parks is very important to me and to our children and grandchildren.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Julienne Johnson
4135 Abbington Ter
Wilmington, NC 28403
jbjohnson118@hotmail.com
(910) 392-5085

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lauren Garrett \(lbgarrett95@gmail.com\) Sent You a Personal Message](mailto:lbgarrett95@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:32:34

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Sincerely,

Lauren Garrett
1949 Big Falls Dr
Wendell, NC 27591
lbgarrett95@gmail.com
(919) 553-2598

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kristina Heiks \(kheiks@yahoo.com\) Sent You a Personal Message](mailto:kheiks@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:30:09

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Sincerely,

Kristina Heiks
2786 Nc Highway 194 N
Boone, NC 28607
kheiks@yahoo.com
(828) 264-9230

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [William Hunter \(william.hunter30@gmail.com\) Sent You a Personal Message](mailto:william.hunter30@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:19:26

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

William Hunter
228 Indian Trail Rd
Chapel Hill, NC 27514
william.hunter30@gmail.com
(919) 448-5779

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rose Shulman \(oufoxu@aol.com\) Sent You a Personal Message](mailto:oufoxu@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:18:54

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Dear N.C. Division of Air Quality,

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Sincerely,

Rose Shulman
346 Piney Grove Church Rd
Traphill, NC 28685
oufoxu@aol.com
(336) 957-2741

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susan Sunflower \(ssflower2@gmail.com\) Sent You a Personal Message](mailto:ssflower2@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:05:13

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Sincerely,

Susan Sunflower
102 College Station Dr Ste 3
Brevard, NC 28712
ssflower2@gmail.com
(772) 242-5303

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Michael Marshall \(mmmarsha@uncg.edu\) Sent You a Personal Message](mailto:mmmarsha@uncg.edu)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:03:25

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Dear N.C. Division of Air Quality,

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Sincerely,

Michael Marshall
605 Hannah McKenzie Dr
Greensboro, NC 27455
mmmarsha@uncg.edu
(336) 545-0171

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Debra Beaver \(debra@lhtech.com\) Sent You a Personal Message](mailto:debra@lhtech.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 09:03:24

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Sincerely,

Debra Beaver
2915 Stevens Mill Rd
Matthews, NC 28104
debra@lhtech.com
(704) 882-2404

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sue Perry \(spinashe@gmail.com\) Sent You a Personal Message](mailto:spinashe@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:55:33

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Dear N.C. Division of Air Quality,

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Sincerely,

Sue Perry
14 Quail Holw
Asheville, NC 28804
spinashe@gmail.com
(828) 575-9424

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sheryl Bowman \(kisscreature@hotmail.com\) Sent You a Personal Message](mailto:kisscreature@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:48:09

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Dear N.C. Division of Air Quality,

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Sincerely,

Sheryl Bowman
134 Goose Rd
Stokesdale, NC 27357
kisscreature@hotmail.com
(336) 613-8608

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Della Albury \(dazzlesinduck@gmail.com\) Sent You a Personal Message](mailto:dazzlesinduck@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:46:08

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Dear N.C. Division of Air Quality,

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Sincerely,

Della Albury
133 S Albetuck Rd
Point Harbor, NC 27964
dazzlesinduck@gmail.com
(252) 305-4350

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Katie Thurman \(kjtsocccergal@gmail.com\) Sent You a Personal Message](mailto:kjtsocccergal@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:45:45

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Katie Thurman
9033 Kensington Forest Dr
Harrisburg, NC 28075
kjtsocccergal@gmail.com
(704) 351-3330

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Gina Dowden \(puppypower1264@sbcglobal.net\) Sent You a Personal Message](mailto:puppypower1264@sbcglobal.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:39:49

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Dear N.C. Division of Air Quality,

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Sincerely,

Gina Dowden
175 Christenbury Ln
Clayton, NC 27527
puppypower1264@sbcglobal.net
(919) 243-1196

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sandy Clark \(sandyonmountain@aol.com\) Sent You a Personal Message](mailto:sandyonmountain@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:34:53

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Dear N.C. Division of Air Quality,

All living beings deserve clean air to breathe and enjoy our beautiful earth, including our parks.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Sandy Clark
38 Ben Owenby Rd
Fairview, NC 28730
sandyonmountain@aol.com
(740) 361-3458

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [keith Johnson \(kmjohnso15@hotmail.com\) Sent You a Personal Message](mailto:keith.johnson15@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:25:08

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Sincerely,

Keith Johnson
810 Buckner Springs Rd
Siler City, NC 27344
kmjohnso15@hotmail.com
(919) 742-9953

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Janet Hendrick \(tobewind4@yahoo.com\) Sent You a Personal Message](mailto:tobewind4@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:15:21

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Dear N.C. Division of Air Quality,

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Sincerely,

Janet Hendrick
3421 NC Highway 58 S
Pollocksville, NC 28573
tobewind4@yahoo.com
(619) 495-5710

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Liz Davis \(ldct@aol.com\) Sent You a Personal Message](mailto:Liz.Davis@aol.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:11:10

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Liz Davis
586 Salola Ln
Brevard, NC 28712
ldct@aol.com
(828) 884-2233

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susan Dutcher \(sndutcher26@gmail.com\) Sent You a Personal Message](mailto:sndutcher26@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:08:19

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Dear N.C. Division of Air Quality,

You are killing the planet and many people with this pollution!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Susan Dutcher
755 Diamondhead Dr S
Pinehurst, NC 28374
sndutcher26@gmail.com
(910) 420-2497

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Brent Koenig \(cgirt@yahoo.com\) Sent You a Personal Message](mailto:cgirt@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:05:25

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Dear N.C. Division of Air Quality,

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Sincerely,

Brent Koenig
7 Coleman St
Weaverville, NC 28787
cgirt@yahoo.com
(619) 857-8532

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Triplett \(marytriplett6@gmail.com\) Sent You a Personal Message](mailto:marytriplett6@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:02:44

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Dear N.C. Division of Air Quality,

With today's ability to change the course of destruction to our planet, why are we still allowing outdated, money grabbing, life killing, WORLD ENDING, activities, practices to continue? Money talks and bullshit walks mentalities? Let's see how much money you can inhale to bring your dead child back. Let's see if these Fictitious numbers behind some corporate name can bring back dead animals, trees, people....life! People need to stop running in the wrong direction with their pockets full of "gold" claiming to help others, sending people to space to find a new place live. TURN AROUND claim the HOME we all share, do the BEST we can, make a difference in today's world, on this planet, in your own communities and DEMAND that dangerous activities such as Coal plants be shut down for good! We have the technology and intelligence to leave a cleaner, healthier world for the children to come after us. Set the example NOW. Save the Earth NOW!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mary Triplett
1212 Chaney Rd
Raleigh, NC 27606
marytriplett6@gmail.com
(919) 233-0061

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Edith Simpson \(mailedie@aol.com\)](mailto:mailedie@aol.com) Sent You a Personal Message
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 08:02:00

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<<mailto:report.spam@nc.gov>>

Dear N.C. Division of Air Quality,

As an Ashevilleian, I can attest to the value of clean air in the parks of WNC for our outdoor-oriented quality of life and our tourism economy. Don't sacrifice our precious environment for the sake of corporate profits like Duke Energy's.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Edith Simpson
15 Springdale Rd
Asheville, NC 28805
mailedie@aol.com
(828) 505-3393

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Karen Fulkerson \(annie@riverdaze.com\) Sent You a Personal Message](mailto:annie@riverdaze.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:58:13

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Karen Fulkerson
505 Oak Creek Rd
Franklin, NC 28734
annie@riverdaze.com
(828) 634-4218

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [cayenne kruse \(krusenc@hotmail.com\) Sent You a Personal Message](mailto:krusenc@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:49:34

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Dear N.C. Division of Air Quality,

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Sincerely,

cayenne kruse
1378, Mashburn Branch Road
Franklin, NC 28734
krusenc@hotmail.com
(828) 506-2256

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Linda Eastman \(lindaeastman1948@gmail.com\) Sent You a Personal Message](mailto:lindaeastman1948@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:48:34

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Linda Eastman
7048 Sevilleen Dr SW
Ocean Isl Bch, NC 28469
lindaeastman1948@gmail.com
(201) 321-0817

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Janine Lafferty \(jayla284@hotmail.com\) Sent You a Personal Message](mailto:jayla284@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:47:26

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Dear N.C. Division of Air Quality,

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Sincerely,

Janine Lafferty
8914 Heron Glen Dr
Charlotte, NC 28269
jayla284@hotmail.com
(704) 588-7708

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Linda Powell \(lindatpowell@gmail.com\) Sent You a Personal Message](mailto:lindatpowell@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:42:48

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Dear N.C. Division of Air Quality,

Please vote for clean air legislation for us, our children, and future generations.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Linda Powell
55 Laurel Ave
Tryon, NC 28782
lindatpowell@gmail.com
(828) 859-8351

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joseph Gardner \(jogardner2@gmail.com\) Sent You a Personal Message](mailto:jogardner2@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:35:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Joseph Gardner
22007 Lady Glencirn Ct
Cornelius, NC 28031
jogardner2@gmail.com
(704) 562-1663

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Gary Feimster \(georgef7373@gmail.com\) Sent You a Personal Message](mailto:georgef7373@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:33:35

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Gary Feimster
845 Graham Loop Rd
Mount Ulla, NC 28125
georgef7373@gmail.com
(704) 550-1895

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lucy Tyndall \(beaverfalls1@yahoo.com\) Sent You a Personal Message](mailto:beaverfalls1@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:21:39

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lucy Tyndall
2958 Caldwell Ridge Pkwy
Charlotte, NC 28213
beaverfalls1@yahoo.com
(336) 582-1973

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lori Bright \(britespirit1@yahoo.com\) Sent You a Personal Message](mailto:britespirit1@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:17:28

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Dear N.C. Division of Air Quality,

Stop the pollution. No more fossil fuels.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lori Bright
75 Hickory Tree Rd Apt E
Asheville, NC 28805
britespirit1@yahoo.com
(828) 699-7924

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Turner \(elk_mtn@mac.com\)](mailto:elk_mtn@mac.com) Sent You a Personal Message
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:11:13

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Dear N.C. Division of Air Quality,

Please help NC make a positive impact on our air quality. Let's move NC into the 21st Century with cleaner air. It's time to take strong action.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

David Turner
390 Elk Mountain Scenic Hwy
Asheville, NC 28804
elk_mtn@mac.com
(828) 252-2088

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Nina Marable \(ninam@atmc.net\) Sent You a Personal Message](mailto:ninam@atmc.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 07:05:43

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Sincerely,

Nina Marable
502 N Shore Dr W
Sunset Beach, NC 28468
ninam@atmc.net
(910) 579-4350

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ginny Nolan \(ginnynolan@embarqmail.com\) Sent You a Personal Message](mailto:ginnynolan@embarqmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:55:45

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Sincerely,

Ginny Nolan
3204 S Memorial Ave
Nags Head, NC 27959
ginnynolan@embarqmail.com
(252) 441-6792

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Shawna Hanson \(ewhanson12@gmail.com\) Sent You a Personal Message](mailto:ewhanson12@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:47:26

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Dear N.C. Division of Air Quality,

Air pollution makes people sick and especially children. Air pollution makes us more vulnerable to COVID.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Shawna Hanson
84 Saint Dunstons Rd
Asheville, NC 28803
ewhanson12@gmail.com
(828) 850-5706

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Renee Fortner \(fortnerrenee@gmail.com\) Sent You a Personal Message](mailto:fortnerrenee@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:34:57

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Dear N.C. Division of Air Quality,

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Sincerely,

Renee Fortner
142 Brevard Rd
Asheville, NC 28806
fortnerrenee@gmail.com
(828) 779-7403

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Robert Zinn \(bzinn11@gmail.com\) Sent You a Personal Message](mailto:Robert.Zinn@bzinn11@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:11:42

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Dear N.C. Division of Air Quality,

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Sincerely,

Robert Zinn
87 Spring Heights Ct
Hendersonville, NC 28791
bzinn11@gmail.com
(336) 454-5117

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Bridget Dunford \(purpledog@hughes.net\) Sent You a Personal Message](mailto:purpledog@hughes.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:11:30

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Dear N.C. Division of Air Quality,

CLEAN AIR IS IMPORTANT TO OUR STATE, OUR PARKS AND WILDERNESSES, AND OUR HEALTH. MAKE PLANS TO ENSURE THE BEST AIR QUALITY POSSIBLE FOR YOUR CONSTITUENTS WITHOUT CONSIDERATION FOR CORPORATE CAMPAIGN DONORS!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Bridget Dunford
525 Patton Valley Dr
Nebo, NC 28761
purpledog@hughes.net
(828) 442-0790

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Martha Henderson \(martha_henderson_nc@yahoo.com\) Sent You a Personal Message](mailto:martha_henderson_nc@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 06:06:26

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Martha Henderson
1809 Hideaway Ln
Durham, NC 27712
martha_henderson_nc@yahoo.com
(919) 381-1824

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Little \(yetsblittle@gmail.com\) Sent You a Personal Message](mailto:yetsblittle@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 05:55:46

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Elizabeth Little
155 Baldwin Dr
Durham, NC 27712
yetsblittle@gmail.com
(301) 305-6973

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Vicky Scott \(vscott9497@gmail.com\)](mailto:vscott9497@gmail.com) Sent You a Personal Message
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 05:31:57

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Dear N.C. Division of Air Quality,

As an avid hiker and backpacker I cherish the Smokey Mountains. As a physician, I support efforts to maintain and improve public health.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Vicky Scott
116 Berry Hill Dr
Hendersonville, NC 28791
vscott9497@gmail.com
(828) 585-6655

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Leonard Cruz \(editor@chironpublications.com\) Sent You a Personal Message](mailto:editor@chironpublications.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 05:24:55

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Dear N.C. Division of Air Quality,

I'm 64 yo, an avid hiker and trail runner and a physician concerned about public health. I love our mountains and long to preserve them and maintain the healthy benefits they afford all who venture into the forests.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Leonard Cruz
116 Berry Hill Dr
Herdersonville, NC 28815
editor@chironpublications.com
(828) 776-0265

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Dee Russell \(deerussell59@gmail.com\) Sent You a Personal Message](mailto:deerussell59@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 05:11:01

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Dee Russell
255 Fine St
Gold Hill, NC 28071
deerussell59@gmail.com
(631) 276-0436

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary Love \(mhlove@me.com\) Sent You a Personal Message](mailto:Mary Love (mhlove@me.com) Sent You a Personal Message)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 05:02:09

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Dear N.C. Division of Air Quality,

Air quality is important. Can't imagine why we would compromise on this.

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Sincerely,

Mary Love
400 N Church St Unit 510
Charlotte, NC 28202
mhlove@me.com
(704) 335-0540

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Teresa Pitts \(tgipitts@earthlink.net\) Sent You a Personal Message](mailto:tgipitts@earthlink.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 04:10:47

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Sincerely,

Teresa Pitts
PO Box 193
Glen Alpine, NC 28628
tgipitts@earthlink.net
(828) 584-1601

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [De Corum \(decorum@gmail.com\) Sent You a Personal Message](mailto:decorum@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 03:52:36

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Dear N.C. Division of Air Quality,

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Sincerely,

De Corum
2805 Herring Blvd
Durham, NC 27704
decorum@gmail.com
(919) 271-4384

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ginger White Almeida \(gentleginger9@gmail.com\) Sent You a Personal Message](#)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 03:14:28

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Sincerely,

Ginger White Almeida
115 Long St Apt 7
Boone, NC 28607
gentleginger9@gmail.com
(984) 289-1690

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [R Monroe \(rmonroe@nc.rr.com\) Sent You a Personal Message](mailto:rmonroe@nc.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 02:50:10

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

R Monroe
6303 Craig Rd
Durham, NC 27712
rmonroe@nc.rr.com
(919) 471-6576

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rob Gelblum \(rgelblum@gmail.com\) Sent You a Personal Message](mailto:rgelblum@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 02:41:10

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Sincerely,

Rob Gelblum
500 Oak Ave Apt B
Carrboro, NC 27510
rgelblum@gmail.com
(919) 604-6900

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Helena Ells \(helena00025@yahoo.com\) Sent You a Personal Message](mailto:helena00025@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 01:12:47

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Sincerely,

Helena Ells
901 Marshall Dr
Concord, NC 28027
helena00025@yahoo.com
(704) 785-8077

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Connie Raper \(ckraper@gmail.com\) Sent You a Personal Message](mailto:ckraper@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:57:10

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Sincerely,

Connie Raper
2614 Woodmont Dr
Durham, NC 27705
ckraper@gmail.com
(919) 698-3252

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Bobby Wynn \(bobbywynn2003@yahoo.com\) Sent You a Personal Message](mailto:bobbywynn2003@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:28:50

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Bobby Wynn
122 Bag End Road
Hendersonville, NC 28739
bobbywynn2003@yahoo.com
(828) 243-5977

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Gareth Wynn \(aarddragon2001@yahoo.com\) Sent You a Personal Message](mailto:aarddragon2001@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:28:17

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Gareth Wynn
122 Bag End Road
Hendersonville, NC 28739
aarddragon2001@yahoo.com
(828) 243-5977

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jeffrey Rix \(jrix@earworm.com\) Sent You a Personal Message](mailto:jrix@earworm.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:28:10

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Dear N.C. Division of Air Quality,

For the kids

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Sincerely,

Jeffrey Rix
73 Elizabeth St
Asheville, NC 28801
jrix@earworm.com
(888) 555-1212

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ariel Wynn \(yearofthepiggleywinks@yahoo.com\) Sent You a Personal Message](mailto:yearofthepiggleywinks@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:27:46

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Ariel Wynn
122 Bag End Road
Hendersonville, NC 28739
yearofthepiggleywinks@yahoo.com
(828) 243-5977

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Peggy Wynn \(casatranio@yahoo.com\) Sent You a Personal Message](mailto:casatranio@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:27:08

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Peggy Wynn
122 Bag End Rd
Hendersonville, NC 28739
casatranio@yahoo.com
(828) 243-5977

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Beth Rosen \(sharphay2@gmail.com\) Sent You a Personal Message](mailto:sharphay2@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:26:40

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Dear N.C. Division of Air Quality,

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Sincerely,

Beth Rosen
118 Charter Ct
Cary, NC 27511
sharphay2@gmail.com
(919) 513-3958

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jen Frank \(jenfurlf@outlook.com\) Sent You a Personal Message](mailto:jenfurlf@outlook.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:17:50

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Sincerely,

Jen Frank
8215 Bennett Ln
Sherrills Ford, NC 28673
jenfurlf@outlook.com
(828) 478-2641

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Barbara Benson \(barbbenson@ec.rr.com\) Sent You a Personal Message](mailto:barbbenson@ec.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Tuesday, September 21, 2021 00:04:08

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Sincerely,

Barbara Benson
104 Deerfield Ct
Cedar Point, NC 28584
barbbenson@ec.rr.com
(252) 393-6495

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Michelle Lee \(misllee@yahoo.com\) Sent You a Personal Message](mailto:misllee@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:51:20

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Dear N.C. Division of Air Quality,

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Sincerely,

Michelle Lee
6746 Vlosi Dr
Charlotte, NC 28226
misllee@yahoo.com
(704) 264-7931

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Melissa Howell \(planetmercury15@aol.com\)](mailto:planetmercury15@aol.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:47:17

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Dear N.C. Division of Air Quality,

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Sincerely,

Melissa Howell
907 Hemlock Dr
Fayetteville, NC 28304
planetmercury15@aol.com
(910) 578-7043

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [William Reavis \(wreavis2@yahoo.com\) Sent You a Personal Message](mailto:wreavis2@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:46:01

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Dear N.C. Division of Air Quality,

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Sincerely,

William Reavis
1105 Piney Grove Rd
Kernersville, NC 27284
wreavis2@yahoo.com
(336) 391-1446

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lynn Carey \(lynncarey1946@gmail.com\) Sent You a Personal Message](mailto:lynncarey1946@gmail.com)
To: SVC_DENR.DAQ.publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:39:07

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Dear N.C. Division of Air Quality,

One of the things that I treasure most about living in North Carolina is its natural beauty, especially her parks. It would be a tragedy to lose such a resource that we love and which attract millions of visitors to our lovely sate.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lynn Carey
2020 Quail Forest Dr Apt A
Raleigh, NC 27609
lynncarey1946@gmail.com
(919) 264-0824

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Stefan Walz \(swalzpromo@gmail.com\) Sent You a Personal Message](mailto:swalzpromo@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:36:47

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Dear N.C. Division of Air Quality,

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Sincerely,

Stefan Walz
100 Parkrise Ct
Cary, NC 27519
swalzpromo@gmail.com
(919) 741-7421

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Irene Zhang \(irenezy.zhang@gmail.com\) Sent You a Personal Message](mailto:irenezy.zhang@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:31:38

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Sincerely,

Irene Zhang
4 Camberwell Ct
Durham, NC 27707
irenezy.zhang@gmail.com
(919) 641-2201

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lauren Beissinger \(kamalalauren@gmail.com\) Sent You a Personal Message](mailto:kamalalauren@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:29:25

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lauren Beissinger
PO Box 95
Brevard, NC 28712
kamalalauren@gmail.com
(828) 384-1500

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Judy Matheny \(hike109@gmail.com\) Sent You a Personal Message](mailto:hike109@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:22:44

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Judy Matheny
PO Box 55
Lake Junaluska, NC 28745
hike109@gmail.com
(828) 734-5242

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Connie Raper \(ckrmob@gmail.com\) Sent You a Personal Message](mailto:ckrmob@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:13:08

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Sincerely,

Connie Raper
9401 Theresa Ln
Rougemont, NC 27572
ckrmob@gmail.com
(919) 698-3282

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ann Rowell \(l.ann.rowell@gmail.com\) Sent You a Personal Message](mailto:l.ann.rowell@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:12:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Ann Rowell
7001 Thermal Rd
Charlotte, NC 28211
l.ann.rowell@gmail.com
(704) 366-0653

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Shannon Ryan \(sryan5@att.net\) Sent You a Personal Message](#)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:10:22

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Dear N.C. Division of Air Quality,

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Sincerely,

Shannon Ryan
15046 Deshler Ct
Charlotte, NC 28273
sryan5@att.net
(704) 449-7373

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carol Dugger \(vcdugger@aol.com\)](mailto:vcdugger@aol.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:08:03

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Dear N.C. Division of Air Quality,

My family and I, and our friends and their families, are counting on you to protect the places that make our state so livable. Please do the right thing!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Carol Dugger
184 Robin Hood Rd
Brevard, NC 28712
vcdugger@aol.com
(828) 862-4523

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mia Elias \(mia_elias@hotmail.com\) Sent You a Personal Message](mailto:mia_elias@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:07:39

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mia Elias
128 Spooks Branch Rd
Asheville, NC 28804
mia_elias@hotmail.com
(828) 628-3008

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Judy Smith \(jsnorkel23@gmail.com\) Sent You a Personal Message](mailto:jsnorkel23@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:06:56

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Dear N.C. Division of Air Quality,

Obviously, we all need clean air to breathe so we can be healthy. We need to be decreasing air pollution by decreasing use of fossil fuels. We are harming ourselves and our ecosystems by delaying action. Please do the right thing now. We've waited too long already!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Judy Smith
2558 Empie Dr
Leland, NC 28451
jsnorkel23@gmail.com
(910) 228-5056

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Paul Mangold \(paul_mangold@msn.com\) Sent You a Personal Message](mailto:paul_mangold@msn.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 23:04:12

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Paul Mangold
2101 Clover Bend Dr
Monroe, NC 28110
paul_mangold@msn.com
(603) 321-3924

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jerome Eischen \(oande@nc.rr.com\) Sent You a Personal Message](mailto:oande@nc.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:53:39

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jerome Eischen
102 Badin Lake Ct
Cary, NC 27519
oande@nc.rr.com
(919) 469-1558

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tracey Varga \(traceyvarga@msn.com\) Sent You a Personal Message](mailto:TraceyVarga@msn.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:50:50

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Tracey Varga
124 Walnut St Apt 503
Wilmington, NC 28401
traceyvarga@msn.com
(910) 793-6675

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Paul Chilton \(ptcchillin@yahoo.com\) Sent You a Personal Message](mailto:ptcchillin@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:49:57

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Paul Chilton
301 Triple Creek Dr
Efland, NC 27243
ptcchillin@yahoo.com
(919) 491-3605

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Travis Dickson \(txd4000@gmail.com\) Sent You a Personal Message](mailto:txd4000@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:49:40

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Travis Dickson
11611 Hidden Grove Trl
Charlotte, NC 28215
txd4000@gmail.com
(980) 200-0460

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Curtis Harrison \(bud.curtis@gmail.com\) Sent You a Personal Message](mailto:bud.curtis@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:49:23

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Curtis Harrison
702 Tarragon Ct
New Bern, NC 28562
bud.curtis@gmail.com
(252) 288-6528

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Margie Spears \(margiedeanespears777@gmail.com\) Sent You a Personal Message](mailto:margiedeanespears777@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:48:31

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Margie Spears
187 Queen Dr
North Wilkesboro, NC 28659
margiedeanespears777@gmail.com
(336) 452-9725

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [John Calhoun \(johnccalhoun@bellsouth.net\) Sent You a Personal Message](mailto:John.Calhoun@bellsouth.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:48:16

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Dear N.C. Division of Air Quality,

Our state and national parks, including the beautiful western N.C. mountain areas, are our crown jewels when people think of N.C. We must spare no effort to clean up the air in these parks, which provide a respite for our spirits and for our lungs. We cannot afford to give a free pass to any industry polluting the air, especially coal-burning power plants. Having seen the pollution emanating from the nearby Belews Creek power plant, I know we need to address further reductions in industrial pollution, to protect our parks and our health.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

John Calhoun
1416 Brookstown Ave
Winston Salem, NC 27101
johnccalhoun@bellsouth.net
(336) 692-2132

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rosemary Tann \(rocatgo@gmail.com\) Sent You a Personal Message](mailto:rocatgo@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:47:21

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Rosemary Tann
14 Painted Trillium Trl
Black Mountain, NC 28711
rocatgo@gmail.com
(954) 646-6634

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Robert Daniel \(robtdaniel90@gmail.com\) Sent You a Personal Message](mailto:robtdaniel90@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:45:20

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Robert Daniel
604 Marseille Ct.
Jacksonville, NC 28546
robtdaniel90@gmail.com
(770) 533-1150

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Timothy Zerr \(taosword47@hotmail.com\) Sent You a Personal Message](mailto:taosword47@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:34:09

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Timothy Zerr
3237 Bragg Dr
Wilmington, NC 28409
taosword47@hotmail.com
(207) 499-2413

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Marla West \(marly2054@aol.com\) Sent You a Personal Message](mailto:marly2054@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:28:49

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Marla West
81 Wild Cherry Rd
Asheville, NC 28804
marly2054@aol.com
(505) 604-1167

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Heather Curtis \(curtis.heather@gmail.com\) Sent You a Personal Message](mailto:curtis.heather@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:28:44

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Dear N.C. Division of Air Quality,

Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

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Sincerely,

Heather Curtis
2636 New Oxford Dr
Apex, NC 27539
curtis.heather@gmail.com
(910) 262-8271

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Julie Gaunt-Harris \(jewels121407@aol.com\)](mailto:jewels121407@aol.com) Sent You a Personal Message
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:28:08

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Julie Gaunt-Harris
1463 Shiptontown Rd
Lexington, NC 27292
jewels121407@aol.com
(336) 242-9454

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Andrea Newman \(newmanandrea@msn.com\)](mailto:newmanandrea@msn.com) Sent You a Personal Message
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:27:28

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Dear N.C. Division of Air Quality,

It is time to move towards clean energy in this state.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Andrea Newman
608 Cottage Ln
Corolla, NC 27927
newmanandrea@msn.com
(703) 356-5582

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Scott Bates \(srbate@hotmail.com\) Sent You a Personal Message](mailto:srbate@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:18:34

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Scott Bates
26 Olde Farm Rd
Pittsboro, NC 27312
srbate@hotmail.com
(757) 229-8502

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Thayer Jordan \(ttjbear1@aol.com\)](mailto:ttjbear1@aol.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:18:31

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Dear N.C. Division of Air Quality,

Love all state parks.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Thayer Jordan
2111 Orange Grove Rd Apt D1
Hillsborough, NC 27278
ttjbear1@aol.com
(919) 428-8220

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Doris Jackson \(djdiva528@gmail.com\) Sent You a Personal Message](mailto:djdiva528@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:09:58

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Doris Jackson
5405 Wheatcross Pl
Raleigh, NC 27610
djdiva528@gmail.com
(919) 612-6968

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Wall \(mtnmama222@yahoo.com\) Sent You a Personal Message](mailto:mtnmama222@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:09:56

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Dear N.C. Division of Air Quality,

I am writing today because I live in the Smoky Mountains, near the National Park. Our National Parks are the "jewels" of our national, so I feel it is urgently important to make sure the air quality and visibility here is protected by the Regional Haze Rule. These areas are critical to wildlife and whole ecosystems. My family enjoys camping and hiking, and the economic life of our region depends on these outside activities and the beauty of the area as well.

However, I have real concerns that the proposed NC DAQ Regional Haze plan will not reduce pollution and will not make good progress toward the clean air we need to keep the parks and national forests and local people who are affected by poor air quality.

Of particular concern to me is that there is not a proper analysis of nitrogen oxide and particulate matter, and pollution from coal plants (!) owned by Duke Energy, making the most polluting haze in our state. Please make changes to this proposed plan and protect us all.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Elizabeth Wall
306 Mountainside Dr
Waynesville, NC 28786
mtnmama222@yahoo.com
(828) 506-3030

From: [Claudia Kaplan \(kaplans@nc.rr.com\) Sent You a Personal Message](mailto:kaplans@nc.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 22:00:04

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Claudia Kaplan
4911 Victoria Dr
Durham, NC 27713
kaplans@nc.rr.com
(919) 932-9635

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Wells \(wells.david123@gmail.com\) Sent You a Personal Message](mailto:wells.david123@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:59:38

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

David Wells
494 Fairview Rd
Asheville, NC 28803
wells.david123@gmail.com
(828) 768-8145

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Erv and Jane Kelman \(ekel0613@cs.com\) Sent You a Personal Message](mailto:ekel0613@cs.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:54:02

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Dear N.C. Division of Air Quality,

It is increasingly obvious that our world is in a climate crisis, and it is untenable for the proposed Regional Haze plan not to require enhanced measures that will REDUCE pollutants.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Erv and Jane Kelman
6 Fleming Terrace Cir
Greensboro, NC 27410
ekel0613@cs.com
(336) 617-0598

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jackson Boone \(tarheelfan0493@yahoo.com\) Sent You a Personal Message](mailto:tarheelfan0493@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:53:25

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Dear N.C. Division of Air Quality,

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Sincerely,

Jackson Boone
1014 Valley St
Kannapolis, NC 28081
tarheelfan0493@yahoo.com
(704) 792-6610

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Alyson Winters \(awinters@nexcomgroup.com\) Sent You a Personal Message](mailto:awinters@nexcomgroup.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:52:35

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Dear N.C. Division of Air Quality,

As a regular hiker in Linville Gorge and the GSM National Park, I value the NC's beautiful wild spaces and fresh air. North Carolinians deserve to have access to recreation and wild spaces without compromising on health and aesthetic beauty.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Alyson Winters
650 Vendue Pl
Charlotte, NC 28226
awinters@nexcomgroup.com
(704) 363-8618

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Judith Rose \(judyrose1937@gmail.com\) Sent You a Personal Message](mailto:judyrose1937@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:46:54

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Judith Rose
70 Acorn Ln
Fletcher, NC 28732
judyrose1937@gmail.com
(828) 628-9670

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Anya Gordon \(anya@wellfedgarden.org\) Sent You a Personal Message](mailto:anya@wellfedgarden.org)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:46:12

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Dear N.C. Division of Air Quality,

Please ensure that our State Parks are free from pollution

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Anya Gordon
428 Emerson Drive
Raleigh, NC 27609
anya@wellfedgarden.org
(919) 523-3484

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Bette Bates \(blbates@mac.com\) Sent You a Personal Message](mailto:blbates@mac.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:43:48

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Dear N.C. Division of Air Quality,

Truly this is a no-brainer for a place famous for its beauty! We need to do the right thing in NC! Thanks.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Bette Bates
124 Valley Dr
Black Mountain, NC 28711
blbates@mac.com
(828) 669-9202

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cassie Whiteside \(cassie@cassieandallen.com\) Sent You a Personal Message](mailto:cassie@cassieandallen.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:41:04

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cassie Whiteside
169 Montford Ave
Asheville, NC 28801
cassie@cassieandallen.com
(828) 215-5971

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Samuel Speciale \(sgspeciale@yahoo.com\) Sent You a Personal Message](mailto:sgspeciale@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:40:28

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Samuel Speciale
14 TREVORS TRL
ASHEVILLE, NC 28806
sgspeciale@yahoo.com
(828) 667-9439

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joan Grant \(joangrant33@hotmail.com\) Sent You a Personal Message](mailto:joangrant33@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:39:19

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Dear N.C. Division of Air Quality,

This is vital to our future!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Joan Grant
354 Oakanoah Cir
Brevard, NC 28712
joangrant33@hotmail.com
(828) 884-9020

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Gerri Morringly \(gmorringly@gmail.com\) Sent You a Personal Message](mailto:Geri.Morringello@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:32:25

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Dear N.C. Division of Air Quality,

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Sincerely,

Gerri Morringly
8310 Compass Pointe East Wynd NE
Leland, NC 28451
gmorringly@gmail.com
(910) 399-7774

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Frank Moore \(fjmoorecpa@yahoo.com\) Sent You a Personal Message](mailto:fjmoorecpa@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:28:22

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Frank Moore
52 Hill Creek Blvd
Chapel Hill, NC 27516
fjmoorecpa@yahoo.com
(919) 372-1545

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jane Carroll \(jcarrollnc@charter.net\) Sent You a Personal Message](mailto:jcarrollnc@charter.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:27:35

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jane Carroll
743 Bee Tree Rd
Swannanoa, NC 28778
jcarrollnc@charter.net
(828) 686-3211

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Clay Denman \(claydenman@gmail.com\) Sent You a Personal Message](mailto:claydenman@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:26:08

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Sincerely,

Clay Denman
547 Rustic Rd
West Jefferson, NC 28694
claydenman@gmail.com
(828) 352-2562

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Aurelie Ward \(health@wardgroup.net\)](mailto:health@wardgroup.net) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:25:22

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Dear N.C. Division of Air Quality,

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Sincerely,

Aurelie Ward
1409 Forest Park Dr
Statesville, NC 28677
health@wardgroup.net
(704) 871-1954

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Amelia Schroeder \(AmeliaSchroeder@yahoo.com\) Sent You a Personal Message](mailto:Amelia.Schroeder@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:21:43

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Dear N.C. Division of Air Quality,

Pretty please with a cherry on top...I love being able to breathe.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Amelia Schroeder
11 Fuller Ln
Asheville, NC 28805
[AmeliaSchroeder@yahoo.com](mailto:Amelia.Schroeder@yahoo.com)
(740) 732-5562

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joseph Jacob \(joejacob@mindspring.com\) Sent You a Personal Message](mailto:joejacob@mindspring.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:21:37

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Sincerely,

Joseph Jacob
747 Rock Rest Rd
Pittsboro, NC 27312
joejacob@mindspring.com
(919) 545-0924

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mary T. Boatwright \(tboat@duke.edu\) Sent You a Personal Message](mailto:tboat@duke.edu)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:19:30

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Dear N.C. Division of Air Quality,

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Sincerely,

Mary T. Boatwright
2040 Englewood Ave
Durham, NC 27705
tboat@duke.edu
(919) 286-1173

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jean Ann Wheelock \(jeanann.wheelock@gmail.com\) Sent You a Personal Message](mailto:jeanann.wheelock@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:17:00

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Sincerely,

Jean Ann Wheelock
53 Trail Top Dr
Asheville, NC 28805
jeanann.wheelock@gmail.com
(828) 255-8323

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [James Randall Walsh \(whitebark@gmail.com\) Sent You a Personal Message](mailto:James.Randall.Walsh@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:16:01

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Dear N.C. Division of Air Quality,

As a proud North Carolinian, professional ecologist, and father of a young son, I urge you to protect our natural heritage, including our the air quality and the visibility within our protected landscapes. The air in our parks can - and should be - as clean and unimpaired as possible. Thank you for vigilantly protecting these special places.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

James Randall Walsh
124 Longview Rd
Asheville, NC 28806
whitebark@gmail.com
(970) 232-4058

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Anthony Bond \(bonda868@gmail.com\) Sent You a Personal Message](mailto:bonda868@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:05:02

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Dear N.C. Division of Air Quality,

North Carolina can do better. Why can't our state be a leader and clean energy and good jobs? does Duke energy have you on the payroll?

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Anthony Bond
104 Doe Ln
New Bern, NC 28562
bonda868@gmail.com
(252) 617-3689

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Michael Markham \(mdmarkham47@gmail.com\) Sent You a Personal Message](mailto:mdmarkham47@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:04:31

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Michael Markham
3619 Edmund Ct
Matthews, NC 28105
mdmarkham47@gmail.com
(704) 451-6484

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carol Rados \(carolrados7@gmail.com\) Sent You a Personal Message](mailto:carolrados7@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 21:03:26

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Dear N.C. Division of Air Quality,

It's very important to improve the air quality in our state. Requiring coal fire plants to clean up the air around them is important. It's also important important to close those plants, and develop clean energy in our state.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Carol Rados
3202 Tucker Dr
Greenville, NC 27858
carolrados7@gmail.com
(252) 558-2591

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Traxler \(davidtraxler@hotmail.com\) Sent You a Personal Message](mailto:davidtraxler@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:58:36

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Dear N.C. Division of Air Quality,

There has never been a better time to move from Fossil fuels to more sustainable energy solutions. Solar and wind backed up by natural gas plants or deep earth geothermal would create jobs, clean air, and a brighter future for the State of North Carolina.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

David Traxler
1138 Bexley Hills Bend
Apex, NC 27502
davidtraxler@hotmail.com
(240) 676-9716

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Stephanie Fitzpatrick \(lief96@hotmail.com\) Sent You a Personal Message](#)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:58:12

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Sincerely,

Stephanie Fitzpatrick
1408 Love Rd
Monroe, NC 28110
lief96@hotmail.com
(704) 996-4056

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carol Carlson \(carolcarlson@gmail.com\) Sent You a Personal Message](mailto:carolcarlson@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:57:16

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Dear N.C. Division of Air Quality,

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Sincerely,

Carol Carlson
6719 Brookbank Rd
Summerfield, NC 27358
carolcarlson@gmail.com
(336) 558-6020

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kathy Cox \(woodboss54@hotmail.com\) Sent You a Personal Message](mailto:woodboss54@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:56:21

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Dear N.C. Division of Air Quality,

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Sincerely,

Kathy Cox
4005 Heather Ct
New Bern, NC 28562
woodboss54@hotmail.com
(540) 636-7733

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Robin Smithwick \(allensmithwick@ec.rr.com\) Sent You a Personal Message](mailto:allensmithwick@ec.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:55:23

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Dear N.C. Division of Air Quality,

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Sincerely,

Robin Smithwick
1800 Nine Mile Rd
Newport, NC 28570
allensmithwick@ec.rr.com
(252) 223-6287

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ryan Robertson \(robertson2002@hotmail.com\) Sent You a Personal Message](mailto:robertson2002@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:55:00

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Sincerely,

Ryan Robertson
104 Silverrock Ct
Cary, NC 27513
robertson2002@hotmail.com
(217) 653-4903

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Swann Lander \(tutuswann@gmail.com\) Sent You a Personal Message](mailto:tutuswann@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:52:59

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Dear N.C. Division of Air Quality,

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Sincerely,

Swann Lander
156 Woodlyn Etch Dr
Hendersonville, NC 28792
tutuswann@gmail.com
(502) 409-6289

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Karen Noftsier \(noftsiark@yahoo.com\) Sent You a Personal Message](mailto:kaftsiark@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:48:29

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Dear N.C. Division of Air Quality,

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Sincerely,

Karen Noftsier
853 Big Cove Rd Apt 15
Cherokee, NC 28719
noftsiark@yahoo.com
(828) 497-7237

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [E. Anne Felty \(sunnydaysgood4me51@gmail.com\)](mailto:sunnydaysgood4me51@gmail.com) Sent You a Personal Message
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:45:53

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Dear N.C. Division of Air Quality,

I live in the Blue Ridge Mountains. Please support this plan. Thank you.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

E. Anne Felty
93 Boxwood Ln
Brevard, NC 28712
sunnydaysgood4me51@gmail.com
(828) 577-2735

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Karen Langelier \(klang4678@gmail.com\) Sent You a Personal Message](mailto:klang4678@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:45:24

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Dear N.C. Division of Air Quality,

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Sincerely,

Karen Langelier
3613A Saint Johns Ct # 17
Wilmington, NC 28403
klang4678@gmail.com
(603) 340-6097

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Anne Brown \(eabrown24@outlook.com\) Sent You a Personal Message](mailto:eabrown24@outlook.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:44:10

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Dear N.C. Division of Air Quality,

I do not understand why the Duke Energy coal pollution is being ignored. Our children will have to deal with this if we don't. I hope it isn't because our politicians are accepting the lobbyists money. New upgrades are viable. Please reconsider doing these upgrades and make changes that will make a difference for our state. Politicians seem to keep passing the problem forward instead of making a real difference. In the end we will pay and so will our children for the lack of foresight.

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Sincerely,

Elizabeth Anne Brown
2004 Blackwood Dr
Raleigh, NC 27612
eabrown24@outlook.com
(919) 676-3532

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Erica Kitchen \(ericankitchen@gmail.com\) Sent You a Personal Message](mailto:ericankitchen@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:34:38

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Erica Kitchen
6309 Kent Cv
Raleigh, NC 27617
ericankitchen@gmail.com
(919) 418-4717

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jane D. Turner \(46sspirit@gmail.com\) Sent You a Personal Message](mailto:46sspirit@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:34:36

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Dear N.C. Division of Air Quality,

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Sincerely,

Jane D. Turner
2510 Main Street Ext
Elizabeth City, NC 27909
46sspirit@gmail.com
(757) 678-0101

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Meghan Prior \(info@lovestruckyoga.com\) Sent You a Personal Message](mailto:info@lovestruckyoga.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:30:13

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Meghan Prior
4210 Sunnyside Dr
Winston Salem, NC 27106
info@lovestruckyoga.com
(336) 922-2995

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ruth Bauer \(spartacusaby@outlook.com\) Sent You a Personal Message](mailto:spartacusaby@outlook.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:28:13

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Ruth Bauer
479 Saint Pauls Rd
Hendersonville, NC 28792
spartacusaby@outlook.com
(828) 685-2231

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Farzana Ismail \(farzy19@yahoo.com\) Sent You a Personal Message](mailto:farzy19@yahoo.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:26:37

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Dear N.C. Division of Air Quality,

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Sincerely,

Farzana Ismail
2937 Grassy Knoll Cir
Thomasville, NC 27360
farzy19@yahoo.com
(732) 613-5799

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Karin Hess \(karinhess@gmail.com\)](mailto:karinhess@gmail.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:24:40

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Dear N.C. Division of Air Quality,

Please set up a plan to close all of the coal powered energy plants in our state in order to clean the air for all citizens in NC.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Karin Hess
304 Milburnie Rd
Knightdale, NC 27545
karinhess@gmail.com
(919) 266-7336

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ken Bosch \(ken.bosch.us@gmail.com\)](mailto:ken.bosch.us@gmail.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:22:06

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Dear N.C. Division of Air Quality,

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Sincerely,

Ken Bosch
4404 Quail Hollow Dr
Raleigh, NC 27609
ken.bosch.us@gmail.com
(919) 855-0900

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Frank Stroupe \(flsjr55@aol.com\) Sent You a Personal Message](mailto:flsjr55@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:18:19

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Sincerely,

Frank Stroupe
329 Raintree Dr
Matthews, NC 28104
flsjr55@aol.com
(704) 821-6162

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Stephen Blundell \(sblundell@yahoo.com\) Sent You a Personal Message](mailto:sblundell@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:17:48

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Dear N.C. Division of Air Quality,

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Sincerely,

Stephen Blundell
4400 Dublin Castle Rd
Greensboro, NC 27407
sblundell@yahoo.com
(810) 338-1114

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Steve Roberts \(poetsroberts@yahoo.com\) Sent You a Personal Message](mailto:poetsroberts@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:17:30

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Dear N.C. Division of Air Quality,

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Sincerely,

Steve Roberts
202 S 3rd St Apt 10
Wilmington, NC 28401
poetsroberts@yahoo.com
(910) 619-3675

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Helen Cleereman \(cleeremanh@att.net\) Sent You a Personal Message](mailto:cleeremanh@att.net)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:17:28

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Dear N.C. Division of Air Quality,

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Sincerely,

Helen Cleereman
1018 Northview St
Garner, NC 27529
cleeremanh@att.net
(919) 662-1751

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rebecca Nussbaum \(rebussbaum@att.net\) Sent You a Personal Message](mailto:rebussbaum@att.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:16:10

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Dear N.C. Division of Air Quality,

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Sincerely,

Rebecca Nussbaum
324 Natalie Dr
Winston Salem, NC 27104
rebussbaum@att.net
(336) 768-9074

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Dottie Bell \(toggle75700@gmail.com\) Sent You a Personal Message](mailto:toggle75700@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:14:42

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Dear N.C. Division of Air Quality,

I moved to NC in December 2019, just before COVID-19 hit. I have been staying at home most of the time since. I am a senior, but I am also vulnerable for COVID-19. I am looking forward to the day when I can start traveling again.

I strongly urge you to do your part to make NC's air safe to breathe. Rewrite the NC plan to take into account the pollution from Duke Energy's coal plants.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Dottie Bell
1203 Coleridge Ct
Franklinton, NC 27525
toggle75700@gmail.com
(919) 964-9835

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ray Flynn \(rflynn5@carolina.rr.com\)](mailto:rflynn5@carolina.rr.com) Sent You a Personal Message
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:13:21

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Ray Flynn
6500 Mounting Rock Rd
Charlotte, NC 28217
rflynn5@carolina.rr.com
(704) 650-7600

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Alice Wieting \(awieting1@yahoo.com\) Sent You a Personal Message](mailto:awieting1@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:13:08

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Alice Wieting
2949 Deepwoods Dr Apt 6308
Burlington, NC 27215
awieting1@yahoo.com
(336) 437-6242

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carmen Plummer \(cplummer3@carolina.rr.com\) Sent You a Personal Message](mailto:cplummer3@carolina.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:06:55

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Carmen Plummer
12721 Hill Pine Rd
Midland, NC 28107
cplummer3@carolina.rr.com
(704) 888-6223

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Barry Auman \(bauman@atmc.net\) Sent You a Personal Message](mailto:bauman@atmc.net)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:03:37

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

I am concerned that NC DAQ's proposed Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit these national parks, wilderness areas and the people who live around polluting facilities. Moreover, I am deeply disappointed that North Carolina has not adequately analyzed nitrogen oxide or particulate matter pollution, nor considered the huge amounts of pollution from Duke Energy coal plants, which are our largest haze polluters in the state, and that the plan does not require any new pollution reductions for the reviewed facilities. Simply relying on existing, suboptimal pollution controls for polluting facilities is insufficient and unacceptable for this plan when new, cost-effective upgrades are viable and could deliver important clean air gains.

I ask that before finalizing this plan, NC DAQ please take the time to revisit Federal Land Manager and stakeholders concerns and correct these harmful oversights and omissions that lead to no new clean air improvements for Class I areas. Please be true to your stated vision to safeguard North Carolina's natural resources and enhance its ecosystems by making critical revisions to your haze plan that will result in demonstrable reasonable progress toward cleaner air - for national parks and wilderness areas and all the people who live in between.

Sincerely,

Barry Auman
543 Sunset Lakes Blvd SW
Sunset Beach, NC 28468
bauman@atmc.net
(910) 579-1485

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carrie Blair \(carrie@treeloversschool.com\) Sent You a Personal Message](mailto:carrie@treeloversschool.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 20:02:37

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Dear N.C. Division of Air Quality,

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Sincerely,

Carrie Blair
PO Box 1008
Brevard, NC 28712
carrie@treeloversschool.com
(540) 364-1232

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Julie Frey \(jrbfrey@gmail.com\) Sent You a Personal Message](mailto:jrbfrey@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:58:39

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Dear N.C. Division of Air Quality,

All life needs clean air at all times for a good quality of life. People shouldn't have to travel to the mountains or unpopulated areas to find clean air to breathe and animals can't get away from unhealthy air.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Julie Frey
103 Pine Lake Dr
Monroe, NC 28110
jrbfrey@gmail.com
(704) 776-9436

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Walter Kross \(wkrb5@yahoo.com\) Sent You a Personal Message](mailto:wkrb5@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:57:01

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Dear N.C. Division of Air Quality,

I think we deserve clean air. I hope you do too.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Walter Kross
32 Imperial Dr
Hendersonville, NC 28792
wkrb5@yahoo.com
(609) 954-2176

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Bev Warner \(bev@wagsideinn.com\) Sent You a Personal Message](mailto:bev@wagsideinn.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:55:40

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Dear N.C. Division of Air Quality,

This is a matter that needs addressing ASAP! The sooner the process starts, the more impact can be made for the quality of air in the environment and less expense to the company!
The ability to breathe clean air is a right each and everyone of us need to protect, fight for and see to it that our earth is well cared for!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Bev Warner
PO Box 5447
Emerald Isle, NC 28594
bev@wagsideinn.com
(315) 247-2417

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Claudio Niedworok \(seafarers@windstream.net\) Sent You a Personal Message](mailto:seafarers@windstream.net)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:53:37

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Claudio Niedworok
3435 Mount Pisgah Church Rd
Broadway, NC 27505
seafarers@windstream.net
(919) 499-2565

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tracey Manning \(tamfatboy99@yahoo.com\) Sent You a Personal Message](mailto:tamfatboy99@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:52:55

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Dear N.C. Division of Air Quality,

Please think of our children. We must put the health of people and the planet ahead of profits for Corporations. Come on?..is it really that hard to do the right thing.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Tracey Manning
3306 Dover Wood Ln
Fuquay Varina, NC 27526
tamfatboy99@yahoo.com
(732) 236-2006

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Dana Bartelt \(danabartelt@hotmail.com\) Sent You a Personal Message](mailto:danabartelt@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:51:34

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Dear N.C. Division of Air Quality,

I can't think of a good reason NOT to save our beautiful Parks. Of course any decent person would want to do the right thing and protect the natural beauty that is a treasure of our state. Please do the right thing.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Dana Bartelt
605 Honey Lane
Raleigh, NC 27604
danabartelt@hotmail.com
(919) 906-9426

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carol Keeser \(ckeecer270@yahoo.com\) Sent You a Personal Message](mailto:ckeecer270@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:50:50

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Dear N.C. Division of Air Quality,

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Sincerely,

Carol Keeser
1976 Tiger Eye Ct
Winston Salem, NC 27127
ckeecer270@yahoo.com
(336) 407-9626

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jamie Rasmussen \(norbert8bubba@yahoo.com\) Sent You a Personal Message](mailto:norbert8bubba@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:47:46

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Dear N.C. Division of Air Quality,

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Sincerely,

Jamie Rasmussen
3695 Henderson St
Denver, NC 28037
norbert8bubba@yahoo.com
(704) 483-5659

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kelly Martinez \(kelmartinez23@gmail.com\) Sent You a Personal Message](mailto:kelmartinez23@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:45:36

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Kelly Martinez
14800 Crooked Branch Ln
Charlotte, NC 28278
kelmartinez23@gmail.com
(704) 989-7982

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Doug Wingeier \(dcwing@main.nc.us\) Sent You a Personal Message](mailto:dcwing@main.nc.us)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:45:22

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Dear N.C. Division of Air Quality,

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Sincerely,

Doug Wingeier
266 Merrimon Ave
Asheville, NC 28801
dcwing@main.nc.us
(828) 246-4885

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Richard George \(regeorge58@yahoo.com\) Sent You a Personal Message](mailto:regeorge58@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:44:20

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Richard George
5849 Greenway Vista Ln
Charlotte, NC 28216
regeorge58@yahoo.com
(717) 889-0408

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Milagros Guzman \(mstilagros@gmail.com\) Sent You a Personal Message](mailto:mstilagros@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:41:37

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Dear N.C. Division of Air Quality,

Air quality is important for all! Reduce air pollution now.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Milagros Guzman
6921 Justice Dr
Raleigh, NC 27615
mstilagros@gmail.com
(919) 771-6041

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [John Freeze \(jfreeze@triad.rr.com\)](mailto:jfreeze@triad.rr.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:41:35

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Sincerely,

John Freeze
648 Chaney Rd
Asheboro, NC 27205
jfreeze@triad.rr.com
(336) 629-2208

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lawrence East \(rstyeast@aol.com\) Sent You a Personal Message](mailto:rstyeast@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:40:45

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Dear N.C. Division of Air Quality,

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Sincerely,

Lawrence East
329 Richlands Ave Apt 8
Jacksonville, NC 28540
rstyeast@aol.com
(999) 999-9999

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Lauren Flanagan \(margerydoe@yahoo.com\) Sent You a Personal Message](mailto:margerydoe@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:38:37

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Dear N.C. Division of Air Quality,

Reducing pollution will help our future hugely!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Lauren Flanagan
11177 Bayberry Hills Dr
Raleigh, NC 27617
margerydoe@yahoo.com
(719) 502-0823

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Marcia Greenstein \(marciarose13@gmail.com\) Sent You a Personal Message](mailto:marciarose13@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:38:02

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Dear N.C. Division of Air Quality,

I am counting on you to ensure all efforts are made to secure the health of our parks and people above profits from coal. We cannot wait any longer for real change!!!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Marcia Greenstein
15 Oregon Ave Apt A
Asheville, NC 28806
marciarose13@gmail.com
(828) 367-8419

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Hellen Shore \(braided@triad.rr.com\) Sent You a Personal Message](mailto:Hellen.Shore@triad.rr.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:36:17

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Sincerely,

Hellen Shore
414 S Main St
Kernersville, NC 27284
braided@triad.rr.com
(336) 682-0800

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jane Rose \(janecrose@embarqmail.com\) Sent You a Personal Message](mailto:janecrose@embarqmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:34:58

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Dear N.C. Division of Air Quality,

We need you to rewrite North Carolina's Regional Haze plan to protect us from Duke Energy's coal plants which are contributing substantially to our haze pollution.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jane Rose
613 Mill Run Rd
Greenville, NC 27834
janecrose@embarqmail.com
(252) 758-7299

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cecil Fisher \(cfishnc@yahoo.com\) Sent You a Personal Message](mailto:cfishnc@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:33:27

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Dear N.C. Division of Air Quality,

Carbon dioxide levels are the highest in two million years, methane and nitrous oxide levels the most elevated in at least 800,000 years.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cecil Fisher
1619 Fort Bragg Rd
Fayetteville, NC 28305
cfishnc@yahoo.com
(910) 484-2664

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Stephen Weissman \(sweissman4@gmail.com\) Sent You a Personal Message](mailto:sweissman4@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:31:39

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Dear N.C. Division of Air Quality,

I often walk in areas along the Blue Ridge Parkway. The haze from power plants burning coal obscures views and stunts trees. The air in our parks should be unpolluted.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Stephen Weissman
8 Oak Ct
Candler, NC 28715
sweissman4@gmail.com
(828) 255-5206

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Frances Mcaroy \(iamdidi@aol.com\) Sent You a Personal Message](mailto:iamdidi@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:30:56

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Dear N.C. Division of Air Quality,

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Sincerely,

Frances Mcaroy
5819 huffine ridge dr
Gibsonville, NC 27249
iamdidi@aol.com
(336) 603-4003

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cathy Crallejones Jones \(crallejones@bellsouth.net\) Sent You a Personal Message](mailto:crallejones@bellsouth.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:29:28

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Dear N.C. Division of Air Quality,

Every minute counts, every ppm counts and every step counts. Please don't miss this opportunity to better air quality by including coal fired plants in the Haze Rule plan.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cathy Crallejones Jones
109 Whispering Pines Ct
Cary, NC 27511
crallejones@bellsouth.net
(919) 744-6078

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jesse Sable \(theojest@aol.com\) Sent You a Personal Message](mailto:theojest@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:28:28

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Sincerely,

Jesse Sable
61 Crossbill Ln Unit 1
Hendersonville, NC 28792
theojest@aol.com
(917) 627-0489

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Todd Fields \(toddfields13@gmail.com\) Sent You a Personal Message](mailto:toddfields13@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:28:05

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Todd Fields
2413 Pleasant Union Church Rd
Raleigh, NC 27614
toddfields13@gmail.com
(919) 847-3645

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cindy Degrave \(degravejc@charter.net\) Sent You a Personal Message](mailto:degravejc@charter.net)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:26:33

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Sincerely,

Cindy Degrave
35 Yorktown Cir
Arden, NC 28704
degravejc@charter.net
(828) 687-2653

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joanne Purnell \(rojo@ec.rr.com\) Sent You a Personal Message](mailto:rojo@ec.rr.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:24:36

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Joanne Purnell
3060 Weatherby Ct
Wilmington, NC 28405
rojo@ec.rr.com
(910) 681-0223

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Rebecca Reid \(reidrobustelli@gmail.com\) Sent You a Personal Message](mailto:Rebecca.Reid@reidrobustelli@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:24:19

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Sincerely,

Rebecca Reid
111 Breckenridge Ct
Hendersonville, NC 28739
reidrobustelli@gmail.com
(828) 808-7051

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Carla Skuce \(carlamskuce@hotmail.com\) Sent You a Personal Message](mailto:carlamskuce@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:23:34

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Sincerely,

Carla Skuce
3940 Lake Ferry Dr
Raleigh, NC 27606
carlamskuce@hotmail.com
(919) 851-8159

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Fairall \(dafair@aol.com\) Sent You a Personal Message](mailto:dafair@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:19:10

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Sincerely,

David Fairall
4828 Selwyn Dr
Winston Salem, NC 27104
dafair@aol.com
(336) 247-6888

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Samantha S \(sjschipman@gmail.com\) Sent You a Personal Message](mailto:sjschipman@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:16:04

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Dear N.C. Division of Air Quality,

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Sincerely,

Samantha S
10307 Stornoway Ct
Charlotte, NC 28227
sjschipman@gmail.com
(704) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jennifer Sparrow \(mockspar@gmail.com\) Sent You a Personal Message](mailto:mockspar@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:15:56

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Sincerely,

Jennifer Sparrow
106 Portsmouth Pl
Chapel Hill, NC 27516
mockspar@gmail.com
(984) 234-0489

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kendall Field \(kmariamarta@gmail.com\) Sent You a Personal Message](mailto:kmariamarta@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:14:40

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Sincerely,

Kendall Field
81 Thermal Hill Ln
Tryon, NC 28782
kmariamarta@gmail.com
(910) 303-0150

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Brett Nachman \(bnachman@wisc.edu\) Sent You a Personal Message](mailto:bnachman@wisc.edu)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:13:36

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Dear N.C. Division of Air Quality,

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Sincerely,

Brett Nachman
2128 Clark Ave Apt 537
Raleigh, NC 27605
bnachman@wisc.edu
(602) 618-0000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Peggy Fry \(real_folkie@yahoo.com\) Sent You a Personal Message](mailto:real_folkie@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:13:11

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Dear N.C. Division of Air Quality,

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Sincerely,

Peggy Fry
115 Pine Cone Rd
Wilmington, NC 28409
real_folkie@yahoo.com
(910) 791-3010

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ellyn and Neil Kirschner \(ellynkirschner@gmail.com\) Sent You a Personal Message](mailto:ellynkirschner@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:12:25

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Dear N.C. Division of Air Quality,

Thank you for considering our concerns and requests regarding our precious Parks Ellyn and Neil Kirschner

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Ellyn and Neil Kirschner
326 tranquil ave
Charlotte, NC 28209
ellynkirschner@gmail.com
(704) 533-2694

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Candace L \(vt_cmonster@hotmail.com\) Sent You a Personal Message](mailto:vt_cmonster@hotmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:10:32

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Dear N.C. Division of Air Quality,

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Sincerely,

Candace L
3311 Marie Dr
Raleigh, NC 27604
vt_cmonster@hotmail.com
(919) 765-1000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Valerie Whitfield \(valwhitfield77@gmail.com\) Sent You a Personal Message](mailto:valwhitfield77@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:09:26

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Dear N.C. Division of Air Quality,

Please, please do the right thing for future generations. Thank You

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Valerie Whitfield
19721 Feriba Pl
Cornelius, NC 28031
valwhitfield77@gmail.com
(704) 765-1550

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jim Atkins \(w4ux@att.net\) Sent You a Personal Message](mailto:w4ux@att.net)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:08:22

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Dear N.C. Division of Air Quality,

Duke Energy is one of the worst environmental pollution supporters with its coal fired plants and absence of solar and wind generation alternatives. It's past time to move to the 21st century.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Jim Atkins
3137 Kinnamon Rd
Winston Salem, NC 27104
w4ux@att.net
(336) 757-6912

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Phil Buchanan \(buchanan4121@gmail.com\) Sent You a Personal Message](mailto:buchanan4121@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:07:34

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Sincerely,

Phil Buchanan
7906 Kennebec Dr
Chapel Hill, NC 27517
buchanan4121@gmail.com
(919) 967-1156

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Patricia Brown \(mpbrownm@gmail.com\) Sent You a Personal Message](mailto:mpbrownm@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 19:03:23

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Dear N.C. Division of Air Quality,

What are we waiting for ???

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Sincerely,

Patricia Brown
209 Landsbury Dr
Durham, NC 27707
mpbrownm@gmail.com
(919) 237-1188

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [M Woolley \(lorettas.mayfels@outlook.com\) Sent You a Personal Message](mailto:M.Woolley@outlook.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:59:38

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Dear N.C. Division of Air Quality,

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Sincerely,

M Woolley
124 College St
Asheville, NC 28801
lorettas.mayfels@outlook.com
(828) 252-8842

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Katherine Cregger-Marshll \(katherinecm1969@gmail.com\) Sent You a Personal Message](mailto:katherinecm1969@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:59:00

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Sincerely,

Katherine Cregger-Marshll
7612 Summerwood Ln
Charlotte, NC 28270
katherinecm1969@gmail.com
(704) 777-1769

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Celli \(elicelli@att.net\) Sent You a Personal Message](mailto:elicelli@att.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:58:34

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Dear N.C. Division of Air Quality,

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Sincerely,

Elizabeth Celli
407 Legends Way
Chapel Hill, NC 27516
elicelli@att.net
(919) 546-4109

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Angie Hendricks \(angiejhendricks@outlook.com\) Sent You a Personal Message](mailto:angiejhendricks@outlook.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:57:19

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Sincerely,

Angie Hendricks
9522 Saddle Run Trl
Charlotte, NC 28269
angiejhendricks@outlook.com
(980) 255-9613

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Barbara Roberman \(barbra.roberman@gmail.com\) Sent You a Personal Message](mailto:barbra.roberman@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:55:22

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Dear N.C. Division of Air Quality,

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Sincerely,

Barbara Roberman
2015 Wilson St
Durham, NC 27705
barbra.roberman@gmail.com
(919) 286-5756

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Susan Redding \(redding47@aol.com\) Sent You a Personal Message](mailto:redding47@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:55:14

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Dear N.C. Division of Air Quality,

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Sincerely,

Susan Redding
601 S Elm St
Greenville, NC 27858
redding47@aol.com
(252) 758-7292

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Theresa Joan Rosenberg \(trosenberg@mindspring.com\) Sent You a Personal Message](mailto:trosenberg@mindspring.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:54:08

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Sincerely,

Theresa Joan Rosenberg
2742 Rue Sans Famille
Raleigh, NC 27607
trosenberg@mindspring.com
(919) 781-5741

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Ruth Van Sickle \(ruthvansickle@yahoo.com\) Sent You a Personal Message](mailto:ruthvansickle@yahoo.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:53:48

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Dear N.C. Division of Air Quality,

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Sincerely,

Ruth Van Sickle
1285 Lower White Oak Rd
Marshall, NC 28753
ruthvansickle@yahoo.com
(828) 689-9974

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Bijan Foroutan \(bforoutan@aol.com\) Sent You a Personal Message](mailto:bforoutan@aol.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:53:21

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Sincerely,

Bijan Foroutan
3713 Old Pfafftown Rd
Winston Salem, NC 27106
bforoutan@aol.com
(336) 473-1460

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Tina Vazquez \(altacv@yahoo.com\)](mailto:altacv@yahoo.com) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:52:59

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<<mailto:report.spam@nc.gov>>

Dear N.C. Division of Air Quality,

We must protect nature!!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Tina Vazquez
80-90 Candler St
Waynesville, NC 28786
altacv@yahoo.com
(305) 790-6651

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Loven \(mdloven@icloud.com\) Sent You a Personal Message](mailto:mdloven@icloud.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:52:21

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Sincerely,

David Loven
4915 Mill Hill Ln
Chapel Hill, NC 27517
mdloven@icloud.com
(919) 929-1568

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [WJ Richardson \(wjr131@gmail.com\) Sent You a Personal Message](mailto:wjr131@gmail.com)
To: SVC_DENR.DAQ_publiccomments
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:51:43

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Dear N.C. Division of Air Quality,

Clean air is healthy air! Please reduce air pollution from the worst sources now!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

WJ Richardson
3712 Bryn Mawr Ct
Raleigh, NC 27627
wjr131@gmail.com
(919) 851-4725

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jeffery Blanton \(jbwolfman@gmail.com\) Sent You a Personal Message](mailto:jbwolfman@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:51:01

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Dear N.C. Division of Air Quality,

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Sincerely,

Jeffery Blanton
1436 E Main St
Cherryville, NC 28021
jbwolfman@gmail.com
(704) 675-6235

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Barry Anderson \(barry@gcp.com\) Sent You a Personal Message](mailto:barry@gcp.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:50:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Barry Anderson
111 W Oregon Ave
Kill Devil Hills, NC 27948
barry@gcp.com
(252) 202-9708

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kicab Castaneda-Mendez \(kicabcm@yahoo.com\) Sent You a Personal Message](mailto:kicabcm@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:50:13

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Dear N.C. Division of Air Quality,

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Sincerely,

Kicab Castaneda-Mendez
878 Fearrington Post
Pittsboro, NC 27312
kicabcm@yahoo.com
(919) 533-6477

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Neil Infante \(aneilio46@icloud.com\) Sent You a Personal Message](mailto:aneilio46@icloud.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:48:22

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Dear N.C. Division of Air Quality,

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Sincerely,

Neil Infante
5303 Lucas Farm Ln
Chapel Hill, NC 27516
aneilio46@icloud.com
(984) 999-4810

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sandra Resner \(sresner@triad.rr.com\) Sent You a Personal Message](mailto:sresner@triad.rr.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:48:21

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Sincerely,

Sandra Resner
7607 Middle Dr
Greensboro, NC 27409
sresner@triad.rr.com
(336) 806-6479

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Linebaugh \(david.linebaugh@gmail.com\) Sent You a Personal Message](mailto:david.linebaugh@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:47:05

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Dear N.C. Division of Air Quality,

It's time for North Carolina to take real steps to reduce air pollution. Evading air pollution responsibility threatens North Carolina's citizens health.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

David Linebaugh
176 Crooked Creek Est
Old Fort, NC 28762
david.linebaugh@gmail.com
(301) 855-2830

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Cathy Nieman Msn \(cathy.nieman@gmail.com\) Sent You a Personal Message](mailto:cathy.nieman@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:47:00

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Dear N.C. Division of Air Quality,

We can't put this off any longer!!

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Cathy Nieman Msn
312 Ivy Hill Rd
Weaverville, NC 28787
cathy.nieman@gmail.com
(828) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Paul O'Neil \(poneilwvu@hotmail.com\) Sent You a Personal Message](mailto:poneilwvu@hotmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:46:07

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I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Paul O'Neil
826 Glendale Ave
Durham, NC 27701
poneilwvu@hotmail.com
(724) 557-3580

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Elizabeth Cruise \(bcrui1@frontier.com\) Sent You a Personal Message](mailto:bcrui1@frontier.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:45:29

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Dear N.C. Division of Air Quality,

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Sincerely,

Elizabeth Cruise
2604 Fairlawn Rd
Durham, NC 27705
bcrui1@frontier.com
(919) 563-9347

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [K Packard \(klp4724@gmail.com\) Sent You a Personal Message](mailto:klp4724@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:42:51

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Dear N.C. Division of Air Quality,

Please save my grandchildren.

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

K Packard
8804 Gotherstone Ct
Raleigh, NC 27615
klp4724@gmail.com
(630) 640-5937

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Joanne Mcgrath \(everythingchanges41905@gmail.com\) Sent You a Personal Message](mailto:everythingchanges41905@gmail.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:41:41

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Joanne Mcgrath
924 Chestnut Cove Rd
Sylva, NC 28779
everythingchanges41905@gmail.com
(828) 631-1572

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Kieta Osteen-Cochrane \(kikima36@yahoo.com\) Sent You a Personal Message](mailto:kikima36@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:41:15

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Sincerely,

Kieta Osteen-Cochrane
36 Albemarle Rd
Asheville, NC 28801
kikima36@yahoo.com
(321) 243-4593

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [L Franklin \(ldfranklinxx@yahoo.com\)](mailto:L.Franklin(ldfranklinxx@yahoo.com)) Sent You a Personal Message
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:40:29

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

L Franklin
383 Boundary St
Waynesville, NC 28786
ldfranklinxx@yahoo.com
(828) 371-6086

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Fred Coppotelli \(coppotelli@earthlink.net\) Sent You a Personal Message](mailto:coppotelli@earthlink.net)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:40:14

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Dear N.C. Division of Air Quality,

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Sincerely,

Fred Coppotelli
383 Seldon Emerson Rd.
Cedar Mountain, NC 28718
coppotelli@earthlink.net
(805) 284-8764

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Sh Mur \(pnuash8@gmail.com\) Sent You a Personal Message](mailto:pnuash8@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:39:29

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Dear N.C. Division of Air Quality,

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Sincerely,

Sh Mur
4613 Dow Ct
Fayetteville, NC 28314
pnuash8@gmail.com
(508) 816-6437

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Mara Wooten \(mew0373@yahoo.com\) Sent You a Personal Message](mailto:mew0373@yahoo.com)
To: [SVC_DENR.DAQ.publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:38:42

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Dear N.C. Division of Air Quality,

I write today because I deeply value our nation's wilderness areas and national parks like those in North Carolina protected under the Regional Haze Rule. These include Great Smoky Mountains National Park and Shining Rock, Linville Gorge, Joyce Kilmer-Slickrock and Swanquarter Wilderness Areas, which are home to treasured wildlife and ecosystems and provide important recreational sanctuaries for visitors from across the state and around the world. I know that ensuring clean air is critical to protecting their health and vitality as well as preserving my enjoyment of these places through clear views and healthy skies.

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Sincerely,

Mara Wooten
70 Silene
Pittsboro, NC 27312
mew0373@yahoo.com
(919) 418-7578

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [Jayce Getz \(jaycegetz@gmail.com\) Sent You a Personal Message](mailto:jaycegetz@gmail.com)
To: [SVC_DENR.DAQ_publiccomments](#)
Subject: [External] Haze Rule Plan: Revise and Include New Pollution Reductions
Date: Monday, September 20, 2021 18:38:41

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Dear N.C. Division of Air Quality,

We should be powering North Carolina with solar instead of coal. It is the perfect climate for it.

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Sincerely,

Jayce Getz
212 Willowbend Ln
Hillsborough, NC 27278
jaycegetz@gmail.com
(608) 469-8728

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



Dear NC Division of Air Quality:

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Sincerely,

Name:

Leslie Jones

Address:

4700 Holston Hills
Holston Hills Rd

City/State/Zip:

37014

Email:

ldcarnes@comcast.net

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Dear NC Division of Air Quality:

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Sincerely,

Name: Joe Hart
Address: 1612 S Tryon St.
City/State/Zip: Charlotte, NC 28203
Email: josephhart16@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Dear NC Division of Air Quality:

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Sincerely,

Name: Bailey Oliver

Address: 3024 Ventosa Dr

City/State/Zip: Charlotte, NC

Email: beolive@g.clemson.edu

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: MICHAEL QUINN
Address: 273 TERRAPIN TRAIL
City/State/Zip: WHITTIER NC 28778
Email: mquinn55@frontier.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Bradley Libby
Address: 7557 Bluff Point Ln
City/State/Zip: Denver NC 28037
Email: bt3libby@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Support
clean
air

Dear NC Division of Air Quality:

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Sincerely,

Name: *Andy Maxwell*
Address: *13017 Hornum Lake Dr*
City/State/Zip: *Chapel Hill NC 27514*
Email: *ASMaxwell@jhs.com*

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: *emily madwell*

Address: *13017 Homestead Lakes dr*

City/State/Zip: *Charlotte NC 28278*

Email: *madwell.emily@gmail.com*

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name:

Sue Rice

Address:

2724 Parkway Dr

City/State/Zip:

Raleigh, NC 27603

Email:

SURice2020@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: *Brian A. Johnson*
Address: *749 Boston Rd*
City/State/Zip: *Taylorville, NC*
Email: *2weeditdirector@yahoo.com*

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: *Mikayla Sherp*
Address: *507 4th St*
City/State/Zip: *Spencer, NC 28849*
Email: *mikayla.sherp@gmail.com*

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Elizabeth Kelchner
Address: 2313 Colony Woods Dr
City/State/Zip: Apex, NC 27523
Email: remkelchner@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Zay Stanton
Address: 4014 US70 Business West Lot 45
City/State/Zip: Clayton NC 27520
Email: whitestanton22@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Dear NC Division of Air Quality:

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Sincerely,

Name: Leah Garland
Address: 105 Oak Island
City/State/Zip: Anderson, SC 29621
Email: Leah+garland@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Sarah Jane Harrell

Address: 735 4th ave NW

City/State/Zip: Hickory NC 28601

Email: sarahjane10599@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Jennifer Menscer

Address: 54 Finney Lane

City/State/Zip: Hiddenite NC 28634

Email: Jenmescer08@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Nathaniel Haskins
Address: 54 Finney Ln
City/State/Zip: Hiddenite NC 28636
Email: scoobysharpgamez@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Megan Keim
Address: 3083 Bruce Garner Rd.
City/State/Zip: Creedmoor, NC 27522
Email: megan.k.keim@gmail.com

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name:

Address:

City/State/Zip:

Email:

Elizabeth Taylor
2010 Lynnwood Dr
Charlotte NC 28209

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Brian Langdon
Address: 1430 Lynx St
City/State/Zip: Owosso MI 48867
Email:

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: DAWOTA KRAMIK
Address: 12219 Windus Ct
City/State/Zip: Charlotte, NC 28273
Email: the.southdakota@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Olivia Stanley
Address: ~~2200 B~~ 2010 Lynnwood Dr ~~Charlotte~~
City/State/Zip: Charlotte NC 28209
Email: olstanley44@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Name:

Address:

City/State/Zip:

Email:

Elizabeth H. Kent 0723@gmail.com
2010 Hymnwood Dr
Charlotte NC 28209
Elizabeth Kent

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Sincerely,



Name: JOHN QUINN
Address: 428 SUNSET DRIVE
City/State/Zip: ASHEVILLE NC 28804
Email: JSUNSET@GMAIL.COM

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Lester Ledbetter

Address: 1314 Brook Rd

City/State/Zip: Charlotte NC

Email: LesLedbetter80@gmail.com

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name:

Joe Thompson

Address:

299 Lashmit Ln

City/State/Zip:

LEX

Email:

JoeThompson@jehocan

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of Environmental Quality
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Raleigh, NC 27603

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Sincerely,

Name: Robert Alcorn
Address: 1405 Rotunda Ct
City/State/Zip: Myrtle Beach, SC 29598
Email: ralcorn@sccoast.net

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of Environmental Quality
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Raleigh, NC 27603

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Sincerely,

Name: Julie Bennett
Address: 243 Kelton Ave
City/State/Zip: Santa Carlos, CA
Email: samsara24@comcast.net

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Sincerely,

Name: Jessica Tugman
Address: 6812 Barcliff drive
City/State/Zip: Charlotte, NC, 28212
Email: Tugman.J09@gmail.com

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Sincerely,

Name: Mary Lou Diener
Address: 1491 Walker Rd
City/State/Zip: Asheville, NC 27205
Email: marylouDiener@gmail.com

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Sincerely,

Name: *Joey Maines*
Address: *5832 Branthurst Dr.*
City/State/Zip: *Charlotte, NC 28269*
Email:

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217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Jordan Pierce
Address: 848 NE 86th St
City/State/Zip: Seattle, WA 98115
Email:

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217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: *Nancy Rader*
Address: *107 Jeremy Dr*
City/State/Zip: *Kings Mtn NC 28086*
Email: *lalsmdabra@aol.com*

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Sincerely,

Name: *Jan Miller*
Address: *1077 Amity Rd.*
City/State/Zip: *Asheboro NC 28127*
Email: *jrm@yahoo.com*

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Sincerely,

Name: J.D. Paschall
Address: 6504 BENSON LN
City/State/Zip: 27040
Email: Jdpappy0423@gmail.com

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Raleigh, NC 27603

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Sincerely,

Name: Robert J. Culler
Address: 6508 BEANSON LN
City/State/Zip: PFAFFLAWN, NC 27040
Email: jeremiah.culler@gmail.com

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Sincerely,

Name: Alex Teixeira

Address: 6 Silverbell Court

City/State/Zip: Durham, NC, 27713

Email: artex913@gmail.com

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Sincerely,

Name: Lona Shockley
Address: 1413 Fleming Rd
City/State/Zip: Greensboro, NC 27410
Email: Lshockley001@triad.rr.com

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Sincerely,

Name: Paul Rose
Address: 10712 Hillgrove Ln Apt 332
City/State/Zip: Charlotte, NC 28273
Email: paul.rose@sgws.com

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Sincerely,

Name: Dreydon Wiske^U

Address: 10900 Brandonwood Ln
City/State/Zip: Matthews NC 28105

Email: Dreydonwiske@gmail.com

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: *Christian Jerome*
Address: *5223 New Hampshire Ave NW*
City/State/Zip: *Washington, DC 20011*
Email:

North Carolina Department
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217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Caara Hunter

Name: *CAARA HUNTER*
Address: *PO BOX 983*
City/State/Zip: *BURNSVILLE, NC 28714*
Email: *fitzheimer@gmail.com*

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

PS - Good Air quality doesn't just impact places, it impacts brain function as well

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Sincerely,

Name: Jeff Hunter
Address: PO Box 983
City/State/Zip: Burnsville, NC 28714
Email: jhunter@npca.org

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217 West Jones Street
Raleigh, NC 27603

Dear NC Division of Air Quality:

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Sincerely,

Name: Robert Hatch
Address: 104 Sanctuary Lane
City/State/Zip: Taylors, SC. 29687
Email: rhatch64@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: JACK MAZZA
Address: 1453 ADAMS ST
City/State/Zip: Salinas, Ca 93906
Email: ONEMORSHOW@aatt.net

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Victoria F. Freeman
Address: 4109 Schoolhouse Cir
City/State/Zip: Little River, SC 29566
Email:

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Adam Bensley
Address: 1152 Dexter Ridge Drive
City/State/Zip: Holly Springs, NC 27540
Email: abensley@e-yahoo.com

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217 West Jones Street
Raleigh, NC 27603

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Sincerely,

Name: Dave Dupont
Address: 828 Schloss St
City/State/Zip: wrightsville Beach NC
Email: david.dupont.pnc.com 28480

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Raleigh, NC 27603

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Sincerely,

Name: Wyatt Salus
Address: 932 Ridge Gate Dr.
City/State/Zip: Lewisville NC 27023
Email: wsalus64@gmail.com

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Sincerely,

Name: John Beeken
Address: 17915 Woodgize Air
City/State/Zip: Davidson, NC 28036
Email: jbbeeken@gmail.com

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Sincerely,

Name: *Gracie Codigan*

Address: *5198 Clearview Dr.*

City/State/Zip: *Winston-Salem, NC, 27104*

Email: *GracieCodigan@Gmail.com*

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of Environmental Quality
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Sincerely,

Name: *KEVIN CADIGAN*
Address: *5198 Clearview Dr*
City/State/Zip: *Winston Salem, NC 27104*
Email: *Kcadigan@triad.rr.com*

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Sincerely,

Name: Bill DUSCHEK
Address: 124 GORDON RD.
City/State/Zip: WILMINGTON, NC.
Email: HALSTEP22@GMAIL

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Sincerely,

Name: Julie Cadigan

Address: 6199 Clearview drive

City/State/Zip: Winston Salem, NC 27104

Email: jmcadigan@cotamount-ncv.edu

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Sincerely,

Name:

Address:

City/State/Zip:

Email:

Jarrod Greene
2621 Grande Ct
Charlotte, NC
@jarrod.greene@gmail.com

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Sincerely,

Name: Shannan Landrum
Address: 3878 Ashland Dr.
City/State/Zip: Maiden NC 29050
Email: mshlandrum@gmail.com

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Sincerely,

Name:

Address:

City/State/Zip:

Email:

Donna Duschek
124 Gordon Rd.
Wilmington NC
weislur4@hotmail.com 28401

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of Environmental Quality
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Sincerely,

Name: *Janie & Cook*
Address: *1020 Reston Woods Ct*
City/State/Zip: *Beas Bend NC 27015*
Email: *coolsumma@gmail.com*

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Sincerely,

Name: Rachel Kushner
Address: 3416 LITTLE HOPE RD
City/State/Zip: CHARLOTTE NC 28209
Email: rachel@kushnerlaw.com

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Sincerely,

Name: Alison Kelley
Address: 7603 Emmerchase trail
City/State/Zip: Huntersville NC 28078
Email: Alisonkelley73@gmail.com

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Sincerely,

Name: Kelly DeMazio
Address: 5000 Paddlewheel Ln.
City/State/Zip: Indian Trail, NC 28079
Email: kelhum77@yahoo.com

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Sincerely,

Name: *Alec Hougdahl*
Address: *226 Marlboro St*
City/State/Zip: *Wilmington NC 28403*
Email: *houghdahlalec@live.com*

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Sincerely,

Name: ShayLee Walker
Address: 3801 Haverhill DRIVE
City/State/Zip: CHARLOTTE, NC 28209
Email: Shaylee.Walker@yahco.com

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Sincerely,

Name: WILLARD KELCHNER
Address: 2313 COLONY WOODS DR
City/State/Zip: APEX / NC / 27523
Email: wkelch@nc.rr.com

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Sincerely,

Name: Kevin Mullen
Address: PO Box 472
City/State/Zip: Marietta, PA 17547
Email: ot daw@mullenbooks.com

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Sincerely,

Name: Catherine Bilger
Address: 70 Newfound St
City/State/Zip: Canton NC 28714
Email:

Bilgrus@yahoo.com

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Sincerely,

Name: *T. Hannon*

Address: *1571 S. Carriage Ln*

City/State/Zip: *New Berlin WI*

Email: *53151*

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Sincerely,

Name:

Michael Bardo

Address:

55 Hunter Ridge Rd #4

City/State/Zip:

Orchard Park NC 1427

Email:

m.bardo@outlook.com

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Sincerely,

Name: Catherine Otley
Address: 26 Maxwell Rd
City/State/Zip: Richmond, Va, 23226
Email: catherineotley@gmail.com

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Sincerely,

Name: Wyndham Freeman
Address: 4109 Schoolhouse Circle
City/State/Zip: Little River, SC 29566
Email:

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Sincerely,

Name: Mark Chase
Address: 55 Ivy Ln
City/State/Zip: Fletcher, NC 28732
Email: mark.chase01@gmail.com

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Sincerely,

Name: *Caara Hunter*
Address: *Po Box 983*
City/State/Zip: *Burnsville, NC 28714*
Email: *fritzheimer@gmail.com*

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Sincerely,

Name: ~~SETH~~FROG SETH JOHNSON
Address: 11 LAKE DRIVE
City/State/Zip: HENDERSONVILLE, NC 28739
Email: SETHFROG@HOTMAIL.COM

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of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Dear NC Division of Air Quality:

The proposed NC Regional Haze plan will not amount to any new reductions in pollution and fails to make reasonable progress toward clean air to benefit places like Great Smoky Mountains National Park, Shining Rock Wilderness Area, and communities around polluting facilities. NC DAQ has not adequately analyzed nitrogen oxides or particulate matter pollution, nor considered Duke Energy coal plants -- the largest haze polluters in the state. Simply relying on existing, sub-optimal pollution controls for these polluting facilities is insufficient and unacceptable when new cost-effective upgrades could deliver important clean air gains. Ensuring clean air is critical to protecting residents' and visitors' health and preserving clear views, breathable air, and safe recreation in these special places. NC DAQ must revisit stakeholders' concerns and correct these harmful oversights and omissions. Please be true to your mission to safeguard NC's natural resources and public health by improving this plan!

Sincerely,

Name: KRISTA Youns Eisenhower ef
Address: 154 ~~Eisenhower~~
City/State/Zip: Eden, NC 27288
Email: Kryrn1@yahoo-com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

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Sincerely,


Name: Greg Keyser
Address: 370 W Duke St
City/State/Zip: Front Royal, VA 22630
Email:

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217 West Jones Street
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Sincerely,

Name: 
Address: 5013 KNIGHTSBRIDGE WAY
City/State/Zip: RALEIGH, NC 27604
Email: josh104@home.com

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of Environmental Quality
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Raleigh, NC 27603

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North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Name: Ethan Davis

Address: 1305 BOX WOOD LN

City/State/Zip: APEX NC 27502

Email:

Ethan.Davis@Live.com

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Sincerely,

Name: Aimee Quillen
Address: 273 Terrapin Trail
City/State/Zip: Whittier, NC 28789
Email: qfolksman@gmail.com

North Carolina Department
of Environmental Quality
217 West Jones Street
Raleigh, NC 27603