



North Carolina Department of Environment and Natural Resources

Pat McCrory  
Governor

John E. Skvarla, III  
Secretary

October 31, 2014

Heather McTeer Toney  
Regional Administrator  
USEPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

**Subject:** North Carolina Regional Haze State Implementation Plan Revision –  
Alternative to Source Specific Best Available Retrofit Technology Demonstration  
for Electric Generating Facilities

Dear Ms. Toney:

I am pleased to submit North Carolina's Alternative to Source Specific Best Available Retrofit Technology (BART) Demonstration for six affected coal-fired electrical generating unit (EGU) facilities. The United States Environmental Protection Agency (EPA) finalized a limited disapproval of North Carolina's regional haze State Implementation Plan (SIP) on June 7, 2012 for relying on the Clean Air Interstate Rule (CAIR) as being equal to or better than BART and concerns about a long-term strategy sufficient to achieve reasonable progress goals. This SIP revision is based on the requirements specified in EPA's Regional Haze Rule (70 FR 39104) and Alternative BART Final Rulemaking (71 FR 60612).

Enclosed is the Alternative to Source Specific BART Demonstration for the following EGUs: Asheville Units 1-2, Belews Creek Units 1-2, Cliffside Unit 5, Marshall Units 1-4, Roxboro Units 1-3, and Sutton Unit 3. The first five facilities are equipped with SO<sub>2</sub> and NO<sub>x</sub> emission controls in response to statewide emission limits specified in the North Carolina Clean Smokestack Act (CSA) legislation. The sixth facility retired its coal-fired boilers in December 2013. North Carolina is relying on the CSA legislation as achieving greater reductions in NO<sub>x</sub> and SO<sub>2</sub> emissions than source-specific BART using the same authority used by the EPA to justify CAIR and the Cross State Air Pollution Rule as Alternative BART (per 40 CFR §51.308(e)(2) and (3)). North Carolina has satisfied all elements required in the regulations, and has demonstrated that the subject sources meet BART in terms of emissions controls for sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) as well as federal enforceability provisions with suitable emission limits. The alternative measure will achieve greater emissions reductions in the amount of 157,274 tons of SO<sub>2</sub> and 44,644 tons of NO<sub>x</sub> by 2018.

The Division of Air Quality (DAQ) issued a public notice announcement on August 19, 2014 indicating that the Alternative BART Demonstration is available for public comment. The public notice announcement was posted on the DAQ website, and offered the public an

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opportunity to request a hearing in accordance with 40 CFR 51.102. The public notice announcement was also sent to a number of distribution lists managed by the DAQ, which include numerous stakeholders from industry, environmental groups, and government agencies. We believe that sending the public notice announcement to such groups is more effective than publishing the notices in a few local newspapers, and is consistent with the requirements described in the April 6, 2011 memorandum, "Regional Consistency for the Administrative Requirements of State Implementation Plan Submittals and the Use of Letter Notices." The DAQ website also contains Rich Site Summary (RSS) feeds which regularly delivers changes to the website content to those that have signed up for it.

The public comment period was open from August 19, 2014 through September 20, 2014. A request for a public hearing was not received by the DAQ. A comment letter was received from the EPA. The two EPA comments contained in the letter were minor, requesting clarifying language be added to the SIP documentation. Appendix C contains the Public Notice Announcement and EPA comment letter. The Federal Land Managers (FLM) were also given an opportunity to review the draft SIP revision as required in the Regional Haze regulations. The DAQ request for comment and FLM response letters are contained in Appendix B. The DAQ has addressed each of the EPA and FLM comments in the attached SIP revision.

The DAQ believes it has in good faith addressed the requirements of the Regional Haze Rule and Alternative BART Final Rulemaking, and appreciates the assistance provided by EPA and FLM staff regarding the formulation and review of this SIP revision. Should you or your staff have any questions or comments concerning this SIP revision, please contact me or Sushma Masemore of my staff at 919-707-8700 or at [sushma.masemore@ncdenr.gov](mailto:sushma.masemore@ncdenr.gov).

Sincerely,



Sheila Holman, Director  
Division of Air Quality, NCDENR

SCH/ssm

Attachment

cc: Michael Abraczinskas, DAQ  
Sushma Masemore, DAQ  
Randy Strait, DAQ  
Scott Davis, USEPA  
Lynorae Benjamin, USEPA