

## **Appendix C**

### **Public Notice Report, Comments Received and Responses**

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Public Notice Report  
For the  
Regional Haze 5-Year Periodic Review State Implementation Plan  
for North Carolina Class I areas

## **Introduction**

On February 26, 2013, a draft version of the “5-Year Period Review State Implementation Plan for North Carolina Class I area” was submitted to the United States Environmental Protection Agency (USEPA). A request for public hearing, in accordance with 40 CFR 51.102, and the public comment period were published on the North Carolina Division of Air Quality (NCDAQ) website, as well as to email distribution lists managed by the NCDAQ. The public comment period was open from February 26, 2013 through April 1, 2013. No requests for a public hearing were received. The public comment period elicited comments from the USEPA and a joint letter from the National Parks Conservation Association and the Sierra Club.

## **Background**

In Section 169A of the 1977 Amendments to the Clean Air Act (CAA), the U.S. Congress established a program for protecting visibility in 156 mandatory Federal “Class I” areas. Class I areas consist of national parks exceeding 6000 acres, wilderness areas and national memorial parks exceeding 5000 acres, and all international parks that were in existence on August 7, 1977. In the 1990 Amendments to the CAA, Congress added 169B and called on the USEPA to issue regional haze rules addressing regional haze impairment from manmade air pollution and establishing a comprehensive visibility protection program for Class I areas.

The USEPA promulgated the Regional Haze Rule on July 1, 1999 (64 FR 35713). States are required to submit state implementation plans (SIPs) to the USEPA that set out each state’s plan for complying with the regional haze requirements. States must demonstrate reasonable progress toward meeting the National goal of a return to natural visibility conditions by 2064. The rule directs states to graphically show what would be a “uniform rate of progress”, also known as the “glide path”, toward natural conditions for each Class I area within the state and certain ones outside the state for each 10-year period until 2064. North Carolina submitted its regional haze SIP on December 17, 2007. Every five years, states are required to submit SIPs that provide a progress report on, and if necessary, mid-course corrections to, the Regional Haze SIP.

North Carolina has five Class I areas within its borders: Great Smoky Mountains National Park, Joyce Kilmer-Slickrock Wilderness Area, Linville Gorge Wilderness Area, Shining Rock Wilderness Area, and Swanquarter Wildlife Refuge. In developing its SIP, North Carolina prepared a long-term strategy and examined the application of Best Available Retrofit Technology (BART) in order to establish reasonable progress goals for Class I areas in the State. The predicted reductions in visibility impairment were expected to result from implementation of existing and planned emission control programs.

Ammonium sulfate is the largest contributor to visibility impairment at North Carolina’s Class I areas, and reduction of sulfur dioxide (SO<sub>2</sub>) emissions is the most effective means of reducing

ammonium sulfate. As such, the majority of the focus with regard to existing and planned emission controls pertains to the largest sources of SO<sub>2</sub> emissions. These sources consist of electricity generating units (EGUs) and large industrial boilers.

This 5-year periodic review addresses: 1) the status of implementation of control measures included in the original regional haze SIP, 2) a summary of emission reductions achieved through the implementation of control measures, 3) an assessment of visibility conditions, 4) an analysis of the changes in emission pollutants, 5) an assessment of significant changes in emissions that may have limited or impeded progress in improving visibility, 6) an assessment of whether the current SIP elements and strategies are sufficient to meet reasonable progress goals and 7) a review of the State's visibility monitoring strategy. This SIP revision addresses each requirement based on visibility improvements observed in the 2006-2010 period.

## **Summary of Federal Land Manager Comments and Public Comments**

In the December 2007 Regional Haze Implementation Plan, the NCDAQ committed to ongoing consultation with the Federal Land Managers (FLMs) throughout the implementation process, including annual discussion of the implementation process and the most recent data available. The NCDAQ hosted a conference call with National Park Service and US Forest Service to discuss progress in western North Carolina. Prior to the public release of this 5-year Periodic Review Report, North Carolina submitted the draft document for review by the FLMs. The FLMs submitted constructive comments which were thoroughly addressed by NCDAQ, resulting in a strengthened document that addresses all required elements to ensure the state is on track to meet visibility goals. The FLM comments are attached at the end of this document.

The public notice comment period was open from February 26, 2013 through April 1, 2013. There were no requests for a public hearing. Comments were received from the USEPA and the National Parks Conservation Association/Sierra Club (NPCA/SC), which are attached following this report.

The following is a summary of the pertinent comments raised during the public comment period, along with the NCDAQ's response. A number of the comments received from the USEPA were minor, mostly requesting clarifying language be added to the SIP documentation. The NCDAQ has added the clarifying language to address the minor comments. Remaining comments and responses are discussed below.

**USEPA Comment:** Key Comments – To fully address 40 CFR 51.308(g)(7), please include a statement in Section 8.0 that no modifications to the existing visibility monitoring strategy are necessary.

**NCDAQ Response:** This statement is already provided in the document. Please see page 63, 2<sup>nd</sup> paragraph, last sentence.

**USEPA Comment:** Related to 40 CFR 51.308(g)(4) in section I, please include a qualitative discussion of the effect on the reported emissions trends of the change in methodology from MOBILE6 to MOVES for estimating mobile source emissions.

**NCDAQ Response:** The report is revised to include a discussion of emissions differences observed between the two models in a recent ozone maintenance area SIP revision.

**NPCA/SC comment:** “The state merely recounts the mechanisms used to estimate 2018 visibility improvements rather than describing to what extent it relies on each program. The specific reductions associated with each program are important because all elements of any SIP approved by USEPA must be enforceable...For example, to the extent that North Carolina relied on the Clean Air Interstate Rule (CAIR), it must reassess its VISTAS 2018 best and final modeling efforts to disregard the rule...CAIR, a rule that has been declared illegal, remanded, and temporarily extended, is, by definition, not permanent and enforceable. Accordingly, North Carolina (1) cannot rely on CAIR as an emissions reduction strategy, and (2) must state to what extent it is relying on each delineated mechanism to achieve its reasonable progress goals.”

**NCDAQ response:** NCDAQ respectfully disagrees with this comment. The April 2013 USEPA guidance document titled *General Principles for the 5-Year Regional Haze Progress Reports for the Initial Regional Haze SIPs (Intended to Assist States and EPA Regional Offices in Development and Review of the Progress Reports)* states that “For a number of eastern and midwestern states, the USEPA rules affecting SO<sub>2</sub> emissions from EGUs are an important component of the regional haze strategy. In addressing this requirement, the 5-year report should include a description of those rules and the status of their implementation as they pertain to sources within the state. Currently, given the vacatur of the Cross-State Air Pollution Rule (CSAPR), the USEPA and states will continue to implement CAIR. It would be useful to discuss the current status of those programs, and any additional EGU rules or limits that may apply.” (p. 4-5). The USEPA makes no distinction regarding such rules to be addressed and implemented, nor the legal uncertainty a given rule may be in. Accordingly, North Carolina has addressed the implementation of CAIR per the requirements laid out in the guidance.

The USEPA guidance further stated that the state is not required to quantifiably identify the extent to which it is relying on any of the mechanisms described in the progress report. On page 7, the USEPA stated that “in meeting this requirement, judgment is appropriate in the degree of quantification for the measures that were relied upon. If a measure is listed as a relied upon measure under 51.308(g)(1) or 51.309(d)(10)(i)(A), this does not necessarily mean a detailed quantification is required for each measure under 51.308(g)(2)...” Therefore, the NCDAQ believes the discussion of rules and measures to reduce regional haze are at a sufficient level in the report.

**NPCA/SC comment:** For Blue Ridge Paper and PCS Phosphate, the state should review the sources for reasonable progress in light of emissions reductions expected from operational changes and Boiler MACT compliance requirements. It would also be helpful to know whether these changes will bring the source below the 0.5 dv impact threshold. For the Cogeneration Facility, a significant increase in emissions is demonstrated, although relatively small compared to EGU emissions. This appears to result from a lack of sufficient reasonable progress limits, considering the facility is located in the area of influence for Swanquarter, which has not met the requirement for maintaining visibility for the 20% best days reasonable progress goal.

**NCDAQ response:** The NCDAQ has provided significant detail regarding the status of emission controls and pending compliance requirements under the boiler MACT and GACT rules at these facilities. According to the USEPA April 2013 guidance, “the EPA views this

requirement [assessment of current strategy] as a qualitative assessment, in light of emissions and visibility trends and other readily available information, as to whether Class I areas affected by the state are on track to meet their 2018 reasonable progress goals. We expect that this requirement can be addressed without performing new air quality modeling.” The USEPA also stated that it expects states to address a significant change that can limit or impede progress that is due to either a significant unexpected increase in anthropogenic emissions that occurred over the 5-year period that was not projected in the analysis for the SIP or a significant expected reduction in emissions that did not occur.

The USEPA further stated that “For those Class I areas where there is a significant overall downward trend in both visibility and nearby emissions, we expect that this assessment will point to those trends in support of a simple negative declaration satisfying this requirement. In Class I areas where less visibility progress has occurred, or where visibility progress is more uncertain, greater attention should be paid to evaluate whether there have been changes to expected emissions patterns in nearby states or source categories within the region that have affected progress.”

The NCDAQ believes it has addressed the three facilities in question in a manner that is consistent with USEPA’s guidance. Additionally, each facility is operating at or below the emission levels used in the 2018 VISTAS modeling. In particular, SO<sub>2</sub> emissions for the Cogeneration Facility have been about 110 tons for the past three years, which is well below the Base G2 2018 estimated typical SO<sub>2</sub> emissions of 1,834 tons or 4 percent of total SO<sub>2</sub> emissions in the Swanquarter area of influence. The G2 2018 inventory was used to calculate the sulfate visibility impairment metric from this unit on Swanquarter Wilderness Area. Using the G2 2018 inventory estimate, the calculated sulfate visibility impairment metric from this unit on Swanquarter Wilderness Area was approximately 1.3 percent. The NCDAQ has added new data showing 2011 visibility results which show a continuous decline in regional haze. As stated in the 5-year Period Review Report, significant improvement in visibility has occurred in 2011 and will continue to occur due to the shutdown and conversion of Jefferies, Lee and Sutton EGUs, accounting for 54 percent of 2018 anthropogenic SO<sub>2</sub> emissions.

**NPCA/SC comment:** “We request a consistent explanation for why an entire year of data (or parts of two years of data) are missing in the first place, and what changes have been made to ensure that (1) missing data are not an obstacle to accurate reporting in the future, and (2) a similar reduction in visibility does not occur in the future at any of the Class I areas in the state.”

**NCDAQ response:** The completeness criteria for regional haze data is described as follows: “In order for a year of data from a site to be used to track progress in improving visibility, all four quarters of that year should be at least 50% complete, and overall, the year should be 75% complete. That is, complete data (including that filled in by substitution of averages), should be available for at least 50% of the sampling days in each quarter of the year and for 75% of all scheduled sampling days for the year. In addition, there should be no more than 10 missing sampling days in a row at any time during the calendar year. With a sampling schedule of every third day, this requirement means that a site should not be out of operation for any period of more than one consecutive month during the calendar year.” (see USEPA (2003) “Guidance for Tracking Progress Under the Regional Haze Rule,”

[http://www.epa.gov/ttn/oarpg/t1/memoranda/rh\\_tpurhr\\_gd.pdf](http://www.epa.gov/ttn/oarpg/t1/memoranda/rh_tpurhr_gd.pdf), p. 2-8)

In 2005, data was missing consecutively between January 1 and March 14. In 2008, data was missing consecutively between September 9 and October 27, and again between November 20 and December 29. Therefore, under the criteria set forth by the USEPA, too many consecutive observations were missing in 2005 and 2008 and neither of these years could be counted in the rolling 5-year average. A 4 year average was used to calculate visibility between the 2006-2010 review period. As stated in the report, the NCDAQ applied data substitution techniques to fill in the missing data; however, this correction did not change the overall 5 year average compared to using a 4-year average.

The NCDAQ acknowledges further clarification is needed, and has revised the report to further explain the periods of missing data. Visibility data for 2011 are added to show improvements seen in recent years. The NCDAQ attempted to obtain 2012 data, but these data are not yet publically released. The addition of 2011 measurements data shows a significant improvement in visibility due to operational changes occurring at sources within the Swanquarter area of influence. The document is revised to include this discussion.

The data network utilized for monitoring visibility and visibility-impairing species within the State (e.g., IMPROVE) is a Federal program funded by the USEPA, with the Swanquarter monitor operated by the U.S. Fish and Wildlife Service. Thus, the State cannot guarantee that periods of missing observations or consecutive observations sufficient to exclude a year from consideration in the rolling 5-year average will not occur again.

The State cannot guarantee that a future reduction in visibility will occur at Class I areas within the State, due to natural circumstances that can develop that are beyond the State's control. Such a circumstance is wildfire- in 2011, lightning sparked three large wildfires across the Coastal Plain of North Carolina, and smoke from these wildfires moved across the Swanquarter monitor and resulted in periodic spikes in particulate organic matter (POM) values. These spikes pushed the average value for 20% worst days higher than they otherwise would have been but for these fires.

**NPCA/SC comment:** North Carolina also notes that a non-EGU facility in Virginia—located within Swanquarter's area of influence—recently eliminated firing their boilers with coal, and therefore has significantly lowered its SO<sub>2</sub> emissions. North Carolina, in consultation with Virginia, should ensure that this fuel change and the resulting emission reductions are permanent and enforceable.

**NCDAQ response:** The NCDAQ has consulted with Virginia, and has obtained additional operational data to understand the current status of controls and emissions at this plant. Additional detail is added to the report, including current permitted requirements and future compliance requirements under the Boiler MACT rule.

**NPCA/SC comment:** Joyce Kilmer-Slickrock Wilderness Area does not have a dedicated monitor, leaving it to be represented by data from the Great Smoky Mountains. We request that North Carolina provide or advocate for a dedicated monitor for this Class I area. We would also like to express our strong support, in line with the state of North Carolina, for the maintenance of the IMPROVE network of monitors. As the state expresses, "it is difficult to visualize how the

objectives [of the program] could be met without the monitoring provided by IMPROVE.” We support continued funding for this network and urge North Carolina to advocate for funding in whatever ways possible.

**NCDAQ response:** The NCDAQ recognizes that many competing needs for Federal funds exists, especially those related to air quality monitoring in recent years. If sufficient funding is available for priority pollutants, the NCDAQ supports a dedicated visibility monitor.

## **Attachments to Public Notice Report**

C-1) Pre-hearing written comments received from the National Parks Conservation Association and the Sierra Club, dated April 1, 2013.

C-2) Pre-hearing written comments from R. Scott Davis, Chief of the Air Planning Branch, USEPA, dated March 29, 2013.

C-3) Public Notice Announcement by the North Carolina Department of Environment and Natural Resources, dated February 26, 2013.

C-4) Pre-draft written comments received from Sandra Silva, Chief of the Branch of Air Quality, U.S. Department of the Interior, Fish and Wildlife Service, November 19, 2012.

C-5) Pre-draft written comments received from Kristin M. Bail, Forest Supervisor, U.S. Department of Agriculture, Forest Service, November 8, 2012.





April 1, 2013

Via email to [daq.publiccomments@ncdenr.gov](mailto:daq.publiccomments@ncdenr.gov)

Sushma Masemore  
NC Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

**Re: Pre-hearing Draft of the Regional Haze 5-Year Periodic Review State Implementation Plan (SIP) for North Carolina Class I Areas**

Dear Ms. Masemore,

On behalf of the National Parks Conservation Association and the Sierra Club, we respectfully submit comments on the Pre-Hearing Draft of the Regional Haze 5-Year Periodic Review State Implementation Plan for North Carolina Class 1 Areas ("Draft 5-Year SIP"). The National Parks Conservation Association is the oldest and largest membership organization dedicated to the protection of the National Park System, with over 750,000 members and supporters nationwide, including approximately 20,000 in North Carolina. The Sierra Club is the nation's largest and most influential grassroots environmental organization, with over 2.1 million members and supporters nationwide and approximately 60,000 members and supporters in North Carolina. NPCA and the Sierra Club have long advocated for regional haze improvements related to our nation's national parks, forests, and wilderness areas. We appreciate the opportunity to comment on this SIP revision.

Purpose and Process of Revisions

Pursuant to 40 CFR 51.308(g), the Draft 5-Year SIP is designed to evaluate the state's progress towards its reasonable progress goals for Class I areas, located within and without North Carolina, that are affected by emissions originating within North Carolina. North Carolina concludes that it is on track to meet its 2018 reasonable progress goals.<sup>1</sup> Draft 5-Year SIP at 67. Moreover, North Carolina concludes

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<sup>1</sup> North Carolina describes the process in these words: "If emissions controls are not on track to meet SIP forecasts, then states would need to take action to assure emissions controls by 2018 will be consistent with the SIP or to revise the SIP to be consistent with the revised emissions forecast." Draft 5-Year SIP at 11. Although not applicable in this case, we would like to be clear that revising reasonable progress goals upwards in the mid-period review, rather than providing appropriate emission reductions to meet set goals, is completely contrary to the goals of the regional haze program and is unacceptable, particularly

that, based upon updated modeling and emissions information, its reasonable progress goals can be reduced from the 2007 submittal. Draft 5-Year SIP at 40. We strongly support the lowering of these goals; however, we also believe that additional revisions are necessary to ensure appropriate continued progress towards the congressionally mandated goal of natural visibility in Class I areas by 2064. For the reasons set forth below, we believe that North Carolina must revise its Draft 5-Year SIP to address certain deficiencies.

### North Carolina's Emission Reduction Strategies

In Section 2.1 of its Draft 5-Year SIP, the state delineates a host of federal and state programs utilized as emission reduction strategies and modeled via VISTAS. Although an excellent synopsis, the state merely recounts the mechanisms used to estimate 2018 visibility improvements rather than describing to what extent it relies on each program. *See* Draft 5-Year SIP at 19. The specific reductions associated with each program are important because all elements of any SIP approved by EPA must be enforceable. *See* 42 U.S.C. § 7410(a)(2)(A), (C) (requiring regional haze plans to include “enforceable emissions limitations” and “to provide for the enforcement of” all adopted measures in the plan); *see also* 40 CFR 51.308(d)(3) (noting that long-term regional haze strategies must include “enforceable emissions limitations....”).

For example, to the extent that North Carolina relied on the Clean Air Interstate Rule (CAIR), it must reassess its VISTAS 2018 best and final modeling efforts to disregard the rule. *See* Draft 5-Year SIP at 20-21. As North Carolina recounted in its Draft 5-Year SIP, the U.S. Court of Appeals for the D.C. Circuit issued a decision on August 21, 2012 directing EPA to implement CAIR while the agency works on a replacement rule. Draft 5-Year SIP at 21. More specifically, in its August 21 decision, the D.C. Circuit emphasized that CAIR is legally flawed, yet directed the EPA to continue to administer the program temporarily to preserve the benefits it offers despite its flaws. *EME Homer City Generation, L.P. v. EPA*, 696 F.3d 7, 37-38 & n.35 (D.C. Cir. 2012). Thus, CAIR, a rule that has been declared illegal, remanded, and temporarily extended, is, by definition, not permanent and enforceable. Accordingly, North Carolina (1) cannot rely on CAIR as an emissions reduction strategy, and (2) must state to what extent it is relying on each delineated mechanism to achieve its reasonable progress goals.

### Non-EGU Emission Reductions

With regard to the state's non-EGU sources, we have concerns about a few of the facilities that were identified as meeting the state's impact threshold within the area of influence for one or more Class I areas. In general, the state should include (or more clearly include) emissions information for non-EGUs in a similar format as Table 3-1 for EGUs. *See* Draft 5-Year SIP at 34-36. This would help the

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if it reflects a failure to install and operate controls required by the initial haze SIP, a failure to meet required emission limits, or a failure of the original SIP to set appropriate emission limits for all applicable sources.

public more clearly evaluate the overall emissions trend, which can be obscured when emission rates are discussed.

For Blue Ridge Paper, the state cites that Boiler MACT standards will reduce SO<sub>2</sub> emissions by more than half by 2019. Draft 5-Year SIP at 38. In light of these changes, the state should review the source for reasonable progress measures to determine if reductions above those required by MACT are reasonable, or are feasible within the first planning period for regional haze. For instance, a higher efficiency scrubber than strictly required by MACT might be justified within a reasonable progress evaluation, at low incremental cost. The time for that evaluation is prior to the installation of controls. It would also be helpful to know whether the anticipated reductions will bring the source below the 0.5 dv impact that it previously exceeded.

We appreciate the reduction in SO<sub>2</sub> emissions rate demonstrated by PCS Phosphate. *See* Draft 5-Year SIP at 39. More information as to the mass emissions rather than the emission rate would be useful. We recommend that North Carolina review this facility for reasonable progress in light of the operational changes and determine appropriate, enforceable emission limits for both total emissions and emission rate, including review of limits below the applicable NSPS standard if feasible. Furthermore, we request information as to whether the changes at PCS Phosphate have brought its impacts below the 0.5 dv threshold.

Finally, we are concerned by the significant increase in emissions demonstrated by the Cogeneration Facility in Kenansville, NC. *See* Draft 5-Year SIP at 39. This increase appears to result from a lack of sufficient reasonable progress limits on the mass-based emissions from the facility. Although the emissions here, as the state notes, are relatively small compared to existing EGU emissions, they are not insignificant, especially given the cumulative nature of the problem. In particular, we note that the facility is located in the area of influence for Swanquarter, which has not met the requirement for maintaining visibility for the 20% best days reasonable progress goal. *See* Draft 5-Year SIP at 41-42. This type of backsliding on total emissions in the area of influence is unacceptable if progress is to be made. The state notes that the facility is subject to area source boiler GACT, requiring some work practice standards and emission reduction measures. Draft 5-Year SIP at 39. Those measures are insufficient for this purpose. This source—and any other reasonable progress source—must have enforceable mass-based and rate-based emission limits determined by a reasonable progress analysis.

#### Visibility Impairment at Swanquarter

We have additional concerns about the increase in visibility impairment at Swanquarter on the 20% best days. *See* Draft 5-Year SIP at 41-42. North Carolina posits that missing data may play a role. Draft 5-Year SIP at 41. However, the explanation that the state provides is not consistent throughout the Draft 5-Year SIP. For example, the state indicates that “no monitoring data” is available for 2008, Draft 5-Year SIP at 3, 41, but then later notes that “[b]oth 2005 and 2008 had incomplete data and therefore

are not included in any 5-year averages.” Draft 5-Year SIP at 46. We request a consistent explanation for why an entire year of data (or parts of *two* years of data) are missing in the first place, and what changes have been made to ensure that (1) missing data are not an obstacle to accurate reporting in the future, and (2) a similar reduction in visibility does not occur in the future at any of the Class I areas in the state. North Carolina also notes that a non-EGU facility in Virginia—located within Swanquarter’s area of influence—recently eliminated firing their boilers with coal, and therefore has significantly lowered its SO<sub>2</sub> emissions. *See* Draft 5-Year SIP at 43. North Carolina, in consultation with Virginia, should ensure that this fuel change and the resulting emission reductions are permanent and enforceable.

### Visibility Monitoring

The Draft 5-Year SIP notes that the Joyce Kilmer-Slickrock Wilderness Area does not have a dedicated monitor, leaving it to be represented by data from the Great Smoky Mountains. Draft 5-Year SIP at 41. We request that North Carolina provide or advocate for a dedicated monitor for this Class I area. We would also like to express our strong support, in line with the state of North Carolina, for the maintenance of the IMPROVE network of monitors. As the state expresses, “it is difficult to visualize how the objectives [of the program] could be met without the monitoring provided by IMPROVE.” Draft 5-Year SIP at 65. We support continued funding for this network and urge North Carolina to advocate for funding in whatever ways possible.

In sum, we support North Carolina’s proposal to adopt more stringent reasonable progress goals, and we encourage the state to analyze prospects for further revisions, as outlined above. Specifically, prior to finalizing its Draft 5-Year SIP, North Carolina must make the aforementioned changes to its 5-Year Periodic Review SIP.

Respectfully submitted,



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



March 29, 2013

Ms. Sheila C. Holman, Director  
Division of Air Quality  
North Carolina Department of  
Environment and Natural Resources  
1641 Mail Service Center  
Raleigh, North Carolina 27699-1641

Dear Ms. Holman:

Thank you for your letter dated February 26, 2013, transmitting a prehearing package regarding North Carolina's State Implementation Plan (SIP) submittal addressing the first periodic progress report under the regional haze program. We understand that this submittal is the subject of a public hearing, if requested, with written comments due by the close of business on April 1, 2013. We have completed our review of the prehearing submittal and offer comments in the enclosure to this letter.

We look forward to continuing to work with you and your staff. If you have any questions, please contact Ms. Lynorae Benjamin, Chief, Regulatory Development Section at (404) 562-9040, or have your staff contact Nacosta C. Ward at (404) 562-9140.

Sincerely,

R. Scott Davis  
Chief  
Air Planning Branch

Enclosure

## Enclosure - Comments on North Carolina Regional Haze Periodic Review

### I. Key Comments:

**40 CFR 51.308(g)(7), Section 8.0:** To fully address 40 CFR 51.308(g)(7), please include a statement in Section 8.0 that no modifications to the existing visibility monitoring strategy are necessary.

### II. General Comments:

1. **40 CFR 51.308(g)(4), Section 6.0:** In Section 6.0, we recommend including an additional table with the emissions inventory data for the year 2007 to augment the State's demonstration addressing 40 CFR 51.308(g)(4).
2. **40 CFR 51.308(g)(4):** In addressing the comment related to 40 CFR 51.308(g)(4) in section I, please also include a qualitative discussion of the effect on the reported emissions trends of the change in methodology from MOBILE6 to MOVES for estimating mobile source emissions.
3. **40 CFR 51.308(g)(6), Section 7.0:** In Section 7.0, the State assesses whether its current regional haze SIP is sufficient to meet reasonable progress goals affected by North Carolina sources to address 40 CFR 51.308(g)(6). In addition to the current analysis, the State could also insert a reference to the emissions trends highlighted in Sections 3.0 and 5.0 to further bolster the State's determination of adequacy.

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT & NATURAL RESOURCES  
PUBLIC NOTICE**

**PURPOSE:** The North Carolina Department of Environment and Natural Resources, Division of Air Quality (NCDAQ), hereby gives notice regarding its Pre-hearing Draft of the Regional Haze 5-Year Periodic Review State Implementation Plan (SIP) for North Carolina Class I Areas. Class I areas represent certain national parks, wilderness areas, national memorial parks and international parks whose visibility has been impaired due to pollution from sources and activities that emit fine particulate matter and their precursors. Affected states are required to submit a SIP to the U.S. Environmental Protection Agency that defines a specific plan for complying with the federal regional haze rule. North Carolina submitted its regional haze SIP on December 17, 2007. Five years after the initial regional haze SIP is submitted, states must evaluate the progress towards the reasonable progress goals for each Class I area. This document serves as North Carolina's 5-year periodic review of the regional haze SIP. Persons wishing to submit comments or request a public hearing are invited to do so.

**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 5-Year Periodic Review SIP. Written comments should be received by no later than April 1, 2013.

**REQUESTS FOR A PUBLIC HEARING:** Requests for a public hearing must be in writing and include a statement supporting the need for such a hearing, an indication of your interest in the subject, and a brief summary of the information intended to be offered at such hearing. A public hearing will be scheduled if requested. A separate notice will be announced for the hearing including the date, time and location. Written requests for a public hearing should be received no later than April 1, 2013 and addressed to Sushma Masemore, Division of Air Quality, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641.

**INFORMATION:** Copies of the Pre-hearing Draft of the Regional Haze 5-Year Periodic Review SIP may be downloaded from the NCDAQ website at [http://www.ncair.org/planning/nc\\_sip.shtml](http://www.ncair.org/planning/nc_sip.shtml).


Comments can be submitted electronically to:  
daq.publiccomments@ncdenr.gov  
(Please type "Regional Haze Mid-Course Review" in the subject line)

Comments can be mailed or faxed to:  
Sushma Masemore  
NC Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641  
Fax: (919) 707-8700

The Pre-hearing Draft of the Regional Haze 5-Year Periodic Review State Implementation Plan for North Carolina Class I Areas may be reviewed in person during normal business hours at the following North Carolina Department of Environment and Natural Resources, Division of Air Quality offices:

Raleigh Central Office, Planning Section	(919) 707-8403
Asheville Regional Office	(828) 296-4500
Washington Regional Office	(252) 946-6481

Date: 2/26/2013

  
\_\_\_\_\_  
Sheila C. Holman, Director



# United States Department of the Interior



**FISH AND WILDLIFE SERVICE**  
National Wildlife Refuge System  
Branch of Air Quality  
7333 W. Jefferson Ave., Suite 375  
Lakewood, CO 80235-2017

IN REPLY REFER TO:  
FWS/ANWS-AR-AQ

November 19, 2012

Ms. Sushma Masemore, P.E., Chief  
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North Carolina Department of  
Environment and Natural Resources  
1641 Mail Service Center  
Raleigh, North Carolina 27699-1641

Dear Ms. Masemore:

On September 18, 2012, the State of North Carolina provided a draft 5 year progress report for the State's Regional Haze, State Implementation Plan (SIP). Overall, the draft and appendices included much of the necessary elements and information needed to adequately address regional haze progress. However, additional information is requested regarding sources originally targeted for further consideration, presentation of IMPROVE monitoring data, and the discussion for the 20% best days at Swanquarter National Wildlife Refuge. At this time, we feel that additional information is necessary prior to agreeing with the State's "negative declaration". We welcome additional consultation on the following concerns:

1. In the December, 2007, Regional Haze State Implementation Plan, NC Division of Air Quality (NCDAQ) identified five sources with greater than 1% contributions at Class I areas. NCDAQ evaluated whether controls were reasonable for these five sources: Blue Ridge Paper, PCS Phosphate, Weyerhaeuser Plymouth, Weyerhaeuser New Bern, and Cogentrix Kenansville. Four of these five sources are listed in Table 2.5, but the text does not discuss the contributions or progress on emissions controls for these facilities. In the 2007 plan, NCDAQ committed to work with these companies over the next review period and to encourage them to modernize some processes with more efficient, less polluting equipment. Please provide an update on emission control efforts from these five facilities.
2. Monitoring data from both the 2000-2004 baseline and 2005-2010 time periods were identified in in the draft 5 year progress report as having missing data periods. Air Resource Specialists filled missing data for the 2000-2004 period using data substitution methods based on correlations from Cape Romain data. Can the State confirm that IMPROVE data presented in the report are consistent with regard to data substitution?



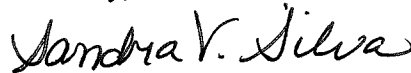


3. The State reports that visibility impairment on the 20% best days at Swanquarter National Wildlife Refuge is poorer for the most recent monitoring days when compared to the baseline. In addition, the executive summary indicated that fire smoke may have been a contributing factor. Additional information should be presented that better identifies and discusses attribution, pollution control implementation, and smoke management, as each relates to the worsening 20% best days.

This letter acknowledges that the U.S. Department of Interior, U.S. Fish and Wildlife Service (FWS), has conducted a substantive review of the draft Regional Haze SIP 5 year progress report in fulfillment of the requirements identified in 40 CFR 51.308(i). Please note, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

It is noteworthy that North Carolina was one of the first States to submit a 5 year progress review for its Regional Haze SIP for Federal Land Management consultation. We compliment you on your hard work and dedication to the significant improvement in our nation's air quality related values and visibility.

Sincerely,



Sandra V. Silva  
Chief, Branch of Air Quality

cc (via e-mail):

Bret Anderson, Acting Air Program Manager, USDA/Forest Service  
Carol McCoy, Director, Air Resources Division, National Park Service  
Michelle Notarianni, Regional Haze Coordinator, EPA Region 4  
David Viker, Regional Refuge Chief, FWS Southeast Region  
Jerry Fringeli, Refuge Manager, Swanquarter NWR

*Sushma*



United States  
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Agriculture

Forest  
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National Forests in North Carolina  
Supervisor's Office

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File Code: 2580

Date: November 8, 2012

Ms. Sheila Holman  
Director  
NC DENR  
Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

Dear Ms. Holman:

The USDA Forest Service has completed our review of the document entitled "Pre-Draft Regional Haze 5-Year Periodic Review State Implementation Plan for North Carolina Class I Areas." Once again, your agency is to be applauded for taking a leadership role in preparing one of the first draft mid-course reviews in the nation. Also, we appreciated the 60 days to review the document and the chance to once again work cooperatively with your staff.

I concur with your findings that the North Carolina Division of Air Quality is on track to meet the reasonable progress goals. The current projections of sulfur dioxide emissions from electrical utilities within North Carolina and from the Tennessee Valley Authority sources in eastern Tennessee are significantly lower than were originally projected for 2018 in the Regional Haze State Implementation Plan. Furthermore, we agree with your conclusion that no additional controls are necessary for the first planning period for emission sources in North Carolina in order to achieve reasonable progress in visibility for federally mandated Class I areas managed in Western North Carolina by the USDA Forest Service.

We look forward to our continued close cooperation toward the national goal of no "man-made" visibility impairment to the Class I areas in our region by 2064.

Sincerely,

*Kristin M. Bail*  
KRISTIN M. BAIL  
Forest Supervisor

cc: Charles E Sams

