



United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



IN REPLY REFER TO

December 10, 2007

N3615 (2350)

Mr. Barry R. Stephens, P.E.
Director, Tennessee Division of Air Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville, Tennessee 37243-1531

Dear Mr. ^{Barry}~~Stephens~~:

On October 26, 2007, the State of Tennessee submitted a draft implementation plan describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Department of the Interior, National Park Service has received and conducted a substantive review of your proposed Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). We have concerns regarding the completeness of the final BART determinations and the rationale for determining the need for additional sulfur dioxide emissions reductions in the Long Term Strategy which meet the Regional Haze Rule requirements of reasonable progress. However, we expect the State will address those concerns before submitting its plan to the U.S. Environmental Protection Agency (EPA). Please note, however, that only the EPA can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

As outlined in a letter to each State dated August 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Manager agencies, and we have enclosed comments associated with these priorities. We look forward to your response, as per section 40 CFR 51.308(i)(3). For further information, please contact Bruce Polkowsky at (303) 987-6944.

Again, we appreciate the opportunity to work closely with the State of Tennessee and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

A handwritten signature in black ink that reads "John Bunzath". The signature is written in a cursive style with a large, sweeping initial "J".

for Christine L. Shaver
Chief, Air Resources Division

Enclosure

National Park Service Comments Regarding Tennessee Draft Regional Haze Rule State Implementation Plan

On October 26, 2007, the State of Tennessee submitted a draft Regional Haze Rule State implementation plan (SIP), pursuant to the requirements codified in federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, National Park Service (NPS). The air program staff of the NPS has conducted a substantive review of the Tennessee draft plan, and has provided the comments listed below. We applaud the Tennessee Division of Air Pollution Control (TNDAPC) for developing a SIP that is responsive to the key policy areas that we identified as important in our August 1, 2006, letter. We particularly appreciate the inclusion of the emissions summary, modeling approach and model performance in the body of the SIP narrative. We also appreciate the TNDAPC's acknowledgment of improvements on the least impaired days that result from the adopted long-term strategy. We offer the following comments in the spirit of cooperation to improve on the items already contained in the draft SIP. We look forward to the State's response as per section 40 CFR 51.308(i)(3). For further information regarding these comments, please contact Bruce Polkowsky at (303) 987-6944.

Best Available Retrofit Technology (BART):

The SIP narrative and supporting documentation should provide more detail on the process by which sources were reviewed for being subject to BART. We understand that the TNDAPC used the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) modeling protocol, except where noted. A summary of the VISTAS modeling protocol and the specific source changes to that protocol should be included in the SIP narrative.

The narrative section of the SIP does not specifically address the State's rationale for final decisions on the four sources that the TNDAPC found subject to BART. In addition, the supporting materials only contain the source's self-analyses. We request that the TNDAPC include, within the SIP narrative, a discussion of the five BART factors for each subject source, and a determination of the State's BART emission limits.

Long Term Strategy:

The supporting materials for the Long Term Strategy assessment are not complete, and we are unable to determine how TNDAPC selected the final list of sources subject to the four factor analysis for reasonable progress. We request the State include in the supporting materials a summary of the process it followed from the point of determining which sources contributed one percent or more of the total extinction, based on sulfur dioxide emissions, to the final conclusion regarding controls that are "reasonable" in this SIP action. Please also include those sources that were exempted from the BART assessment in this summary.

If the TNDAPC used a specific threshold for cost effectiveness for sulfur dioxide removal when deciding on additional controls for reasonable progress in the Long Term

Strategy, that threshold should be documented in the SIP narrative. In addition, although VISTAS concluded that SO₂ should be the focus for Reasonable Progress for 2018, we believe that this does not preclude looking at NO_x controls. Therefore, the TNDAPC should consider NO_x controls (e.g., using low-NO_x burners year-round, Selective Catalytic Reduction) on its large industrial boilers and processes.

Specific Comments:

1. Page 42, Section 7.2, please identify if there are any sources in Tennessee that are likely to be affected by the national consent agreements regarding petroleum refiners.
2. Page 62, Section 7.5, recommend including maps, tables and discussion for additional Class I areas (e.g., Mammoth Cave NP, Mingo WA, Cohutta WA and Sipsy WA) impacted by TN sources in this section. Such a discussion is referenced in VISTAS assessment included in Appendix M, but we recommend adding this information to the main body of the SIP.
3. Page 64, Section 7.5.2, the last paragraph states “. . .eight (8) of Tennessee’s twelve (12) BART-eligible sources were able to demonstrate that they did not cause or contribute to visibility impairment in any Class I area within 300 km of the source.” We would like the State to modify this statement to acknowledge that these sources did not meet the threshold test for action under BART in this SIP. These sources, particularly when taken as a group certainly contribute to visibility impairment at one or more Class I areas and should be reviewed in future SIP actions on “reasonable progress”. In addition, if TNDAPC is anticipating that sources not being addressed under BART will be reviewed in the near future under programs to address ambient standards or other programs, the State should commit to report on those efforts in the required 5-year review of the Regional Haze Rule implementation plan.
4. Pages 63-68, Section 7.6, Figures 7.6-1 through 7.6-4 and Table 7.6.5.5 all illustrate neighboring state contributions to visibility degradation at Great Smoky Mountains NP and Joyce Kilmer / Slickrock WA on the 20% worst days. Please provide additional discussion in the main body of the SIP discussing the consultation with these States to address those contributions. Please see also comments #8 and #9 below regarding Section 10.0.
5. Page 75, Section 7.6.4, we would like to see a list of the sources located within the Area of Influence of each Class I area in Tennessee. A summary list of these sources should be included in the SIP narrative, much like the identification and listing of BART eligible sources. Providing these sources by name will add clarity to the reasonable progress discussion, especially with respect to the cost effectiveness of controls for the non-EGU sources. In addition, the SIP implies TNDAPC used lists of individual sources to see if other source categories were major contributors to SO₂ emissions in the Area of Influence, but no conclusions were provided in the narrative.

burns be significant enough to be addressed in each planning phase?

7. Page 86, Section 7.9, please add a discussion of other programs that will balance growth or relocation of emissions and the regional haze goals. For example, TNDAPC should discuss the Prevention of Significant Deterioration/New Source Review program as a tool for considering emissions growth and its effect on the regional haze plan.
8. Page 82, Section 10.0, please identify what Class I areas the TNDAPC considered when evaluating if the State's emissions impacted other Class I areas in neighboring states. Also, please include any consultations Tennessee has had with those Class I area states. As mentioned in Comment #5 above, including information in Appendix H directly into the main body of the SIP would be helpful to the discussion in Section 10.0 (as well as Section 7.5).
9. Page 82, Section 10.0, it would be helpful to again see information discussing which states were contributors to visibility impairment and a discussion describing the consultation with these States to address their contributions (similar to Section 7.4 or 7.5 or reference those sections).
10. Page 83, Section 11.0, in accordance with 40 CFR 51.308(i)(4), please provide specific procedures for assuring ongoing FLM-State consultation on implementing the provisions of the SIP, developing the 5-year review, and working on the SIP revision due in 2017. Annual discussions of the implementation plan may not be sufficient to meet this ongoing consultation requirement.