



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240



OCT 02 2007

Mr. B. Keith Overcash, P.E.  
Director, North Carolina Department  
of Environmental and Natural Resources  
Division of Air Quality  
2728 Capital Boulevard.  
Raleigh, North Carolina 27604

Dear Mr. Overcash:

On August 2, 2007, the State of North Carolina submitted a draft implementation plan describing your 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 Wildernesses Areas for future generations.

The U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS) have 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). Please note, however, 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.

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. Note that we have highlighted comments in bold face that we feel warrant additional consultation prior to public release. We look forward to your response as per section 40 CFR 51.308(i)(3). For further information, please contact or Tim Allen (FWS) or Bruce Polkowsky (NPS) at (303) 914-3802 and (303) 987-6944, respectively.

Again, we appreciate the opportunity to work closely with the State of North Carolina 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, appearing to read "Darnley". The signature is written in a cursive style with a long, sweeping tail on the final letter.

**Darnley** Assistant Secretary for  
Fish and Wildlife and Parks

Enclosure

## **U.S. Fish and Wildlife Service and National Park Service Comments Regarding North Carolina Draft Regional Haze Rule State Implementation Plan**

On August 2, 2007, the State of North Carolina 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, U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS). The air program staff of these Federal Land Management (FLM) agencies have conducted a substantive review of the North Carolina draft plan, and provide the comments listed below. The comments which are highlighted in bold face are those that we believe warrant additional consultation prior to public release of the North Carolina Regional Haze Plan. We look forward to your response as per section 40 CFR 51.308(i)(3). For further information, please contact Tim Allen (FWS) or Bruce Polkowsky (NPS) at (303) 914-3802 and (303) 987-6944, respectively.

### **HIGHLIGHTED COMMENTS:**

#### **1. Blue Ridge Paper**

**The draft SIP has a policy decision regarding “reasonable progress” which limits consideration of additional sulfur dioxide control measures for reasonable progress of major stationary sources that “contribute” to visibility impairment to a cost impact associated with implementation of North Carolina’s Clean Smoke Stacks law. While this policy addresses costs equitably among various sources, it does not allow for consideration of the magnitude or frequency of an individual source’s impacts. In particular, Blue Ridge Paper has a very large visibility effect on multiple Class I areas and may warrant controls at a somewhat higher cost.**

**Blue Ridge Paper has a mix of Best Available Retrofit Technology (BART) eligible units<sup>1</sup> and pre-BART units that contribute significantly to visibility impairment on a frequent basis. Little information is provided in the SIP that discusses Blue Ridge or like sources that should be considered when the State performs an analysis of “reasonable progress”.**

**The Fish & Wildlife Service and National Park Service request that specific information be presented in the main body of the SIP regarding sources significant to the “reasonable progress” evaluation. Specifically, North Carolina should identify Blue Ridge Paper as a source that currently has “significant visibility impacts on multiple Class I areas”. We request that the State SIP describe a plan to address**

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<sup>1</sup> BART-eligible sources are those sources that have the potential to emit 250 tons or more of a visibility-impairing air pollutant, were put in place or under construction between August 7, 1962 and August 7, 1977, and whose operations fall within one or more of 26 specifically listed source categories. Under CAA section 169A(b)(2)(A), BART is required for any BART-eligible source which “emits any air pollutant that may reasonably be anticipated to cause or contribute to any impairment of visibility in any such area.” At Blue Ridge Paper, some of the units fall within the date range described above, and several more are older.

these impacts through consultation with the company and to identify potential control actions that could be implemented prior to 2018.

## 2. PCS Phosphate

The draft SIP identifies PCS Phosphate-Aurora, as both a BART source and as an individual source analyzed in determining reasonable progress towards the Regional Haze Goals at Swanquarter National Wildlife Refuge (NWR). PCS Phosphate is located 31 km from the Swanquarter NWR and was modeled to have a 0.976 deciview impact to visibility in the refuge. The company submitted a BART determination to North Carolina Department of Environment and Natural Resources (NCDENR). The conclusion reached by the company is that no cost effective controls are available for this BART facility. While it is our understanding that NCDENR has not taken final action on the company's BART determination, the "Reasonable Progress" section of the draft SIP indicates that the State has also reached the same conclusion.

We have concerns that the BART determination submitted by PCS Phosphate did not fully evaluate the effectiveness and associated costs of controls. The U.S. Environmental Protection Agency (EPA) previously raised these concerns in a letter dated March 2, 2007, from Kay Prince, Chief –Air Quality Planning Branch, to Sheila Holman, NCDENR-Division of Air Quality. EPA's comments addressed the control, cost, and modeling analysis, performed by PCS Phosphate. We agree with the concerns raised by the EPA, and ask that NCDENR address the issues raised in that letter.

In regards to the dollar threshold NCDENR is establishing with its Clean Smoke Stack law, both PCS Phosphate and NCDENR have determined that no cost effective controls are available for the facility. However, as noted by EPA, PCS Phosphate did not evaluate full efficiency of the use of a cesium catalyst at sulfuric acid plants 3 and 4, nor were lesser control levels considered. Should a greater level of control be evaluated, the cost per ton could be significantly reduced. We believe that PCS Phosphate has not adequately demonstrated that control costs are prohibitive, and we request that additional control efficiencies be analyzed.

### GENERAL COMMENTS:

3. Page 11, Table 2.3-1 shows natural background and baseline conditions for North Carolina Class I areas. Recently, errors in these estimates were found by CIRA. New estimates are available on both the IMPROVE and VIEWS websites. Please verify that all baseline and natural condition numbers match throughout the documents.
4. Page 13, Particulate Organic Matter (POM) is stated as the second most important contributor to fine particle matter, yet the discussion concludes that controlling anthropogenic sources will have little effect. Please add clarity by discussing the ratios of anthropogenic and non-anthropogenic contribution.

5. Page 18, electric generating utilities and industrial sources are identified as the major categories for stationary point sources yet little discussion is provided on the effects of stationary sources. Please add more clarity on these effects.
6. Page 26, in the bullets, please change “Publicly available on no or low cost” to “Publicly available at no or low cost”.
7. Page 51, please identify on the glide slope charts whether data used was actual model output or the result of using a relative reduction factor. If these numbers were the result of a relative reduction, please provide a discussion of what and how those numbers were generated.
8. Page 58-59, it is declared that all international fire emissions are natural even though subsequent discussion describes both natural and non-natural international components. Please clarify why a portion of international emissions from fire are not natural.
9. Page 59, the CAMx model is addressed without description. Please provide an appropriate discussion on performance and usability of this model for comparison purposes.
10. Page 61, figure 7.3-3 presents results on projected visibility glide slope for Swanquarter NWR, NC. One data point is offered to represent a projection of haziness if international effects were removed. Providing this data is considerably misleading without removing an appropriate amount of international contribution from the 2064 estimate of natural condition. Please remove an appropriate international contribution from the natural condition and present a new glide slope line.
11. Page 63-65, charts and discussion are provided to discuss neighboring state contributions to visibility degradation at Class I areas. Please provide additional discussion in the main body of the SIP discussing the consultation with these States to address those contributions.
12. Page 74+, tables provide apportionment information for a variety of source categories. Earlier in the document, it was stated that energy generation and industrial sources were the major contributors. Please provide more clarity on how these two source categories have been subdivided into these tables.
13. Page 80, a discussion is presented identifying the need to evaluate the IPM and CAIR projections to address their associated uncertainties as part of your mid-term review. Please add discussion regarding the ongoing State PSD/NSR activities to ensure adequate protection for visibility impacts from major new or modified stationary sources on Class I areas.
14. Page 82-85, a discussion of BART sources is provided which includes specific lists of sources and description of estimated impact. Please provide a similar discussion on sources that were determined to be significant as part of the area of influence and reasonable progress evaluations as produced in the VISTAS work. Please provide equal

detail including specific source names and individual impact discussion. Please provide this summary in the main body of the SIP.

15. Page 88, please update the time estimate of the final CMAQ run. When will final visibility projections be ready for final submission to the public or EPA?
16. Please provide specific procedures for assuring ongoing FLM-State consultation on implementation of the provisions of the SIP, the development of the 5-year review and work on the SIP revision due in 2017.

Additionally, we've also had the opportunity to review the Smoke Management Plan (SMP) that is referenced in the draft SIP. Overall, the SMP does a good job meeting the goal of an SMP which, as you know, is to provide the opportunity to use prescribed fire as a land management tool while protecting the health and welfare of the State's citizens.

We are encouraged by "Section E. SMP Evaluation and Reporting" which will allow the State to evaluate and modify the SMP as needed in response to new air quality issues as they arise, while creating a minimum impact on the prescribed fire community. .

We do, however, recommend that the State "certify" the SMP as provided for in EPA's "Interim Air Quality Policy on Wildland and Prescribed Fire".