



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



N3615 (2350)

March 29, 2012

Lynorae Benjamin, Chief
Regulatory Development Section
Air Planning Branch, Air, Pesticides and
Toxics Management Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

EPA Docket ID: EPA-R04-OAR-2010-0219

Dear Ms. Benjamin:

The National Park Service (NPS) has reviewed the Environmental Protection Agency's (EPA's) proposed "Approval and Promulgation of Air Quality Implementation Plans; North Carolina; Regional Haze State Implementation Plan." We are concerned that the North Carolina Department of Environment and Natural Resources, Division of Air Quality (NCDAQ), and EPA in its proposal to approve North Carolina's Plan, have not adequately supported NCDAQ's conclusion that no further controls at Blue Ridge Paper Products are necessary at this time¹:

After reviewing NCDAQ's methodology and analyses and the record prepared by NCDAQ, EPA proposes to find North Carolina's conclusion that no further controls are necessary at this time acceptable. EPA proposes to find that North Carolina adequately evaluated the control technologies available at the time of its analysis and applicable to this type of facility and consistently applied its criteria for reasonable compliance costs. The State also included appropriate documentation in its SIP of the technical analysis it used to assess the need for and implementation of reasonable progress controls. Although the use of a specific threshold for assessing costs means that a state may not fully consider available emissions reduction measures above its threshold that would result in meaningful visibility improvement, EPA believes that the North Carolina SIP still ensures reasonable progress. In proposing to approve North Carolina's reasonable progress analysis, EPA is placing great weight on the fact that there is no indication in the

¹ Federal Register / Vol. 77, No. 39 / Tuesday, February 28, 2012 ENVIRONMENTAL PROTECTION AGENCY 40 CFR Part 52 [EPA-R04-OAR-2010-0219-201148; FRL-9639-2] Approval and Promulgation of Air Quality Implementation Plans; State of North Carolina; Regional Haze State Implementation Plan AGENCY: Environmental Protection Agency (EPA). ACTION: Proposed rule. Pp11870 - 72

SIP submittal that North Carolina, as a result of using a specific cost effectiveness threshold, rejected potential reasonable progress measures that would have had a meaningful impact on visibility in its Class I areas. EPA notes that given the emissions reductions resulting from CAIR and the measures in nearby states, the visibility improvements projected for the affected Class I areas are in excess of that needed to be on the uniform rate of progress.

The Blue Ridge Paper Products (BRPP) Canton facility is a bleached Kraft pulp mill producing bleached Kraft softwood and hardwood pulp, paper and paperboard. Existing emissions sources include: five power boilers, a batch digester and brown-stock washer system, two recovery boilers, black liquor evaporator system, turpentine recovery system, two lime kilns, a chlorine dioxide generator, two pulp bleaching systems, three paper machines and a paperboard dryer.

We agree with NCDAQ's Reasonable Progress (RP) analysis that found that one or more emission units at BRPP met its criteria for a four-factor analysis due to potential impacts at Great Smoky Mountains National Park, Linville Gorge Wilderness Area (WA), Shining Rock WA, and Joyce Kilmer-Slick Rock WA. A four-factor analysis consists of:

- Cost of Compliance
- Time Necessary for Compliance
- Energy and Non-Air Quality Environmental Impacts of Compliance
- Remaining Useful Life of the Source

We could find no information in the docket to support any of the "Cost of Compliance" estimates presented by EPA in its Federal Register Notice:

Based on information from the company, this lower sulfur coal is \$75– \$90/ton SO₂, and the other coal used at the facility is \$65/ton SO₂. The cost difference is \$10–25/ton SO₂. The company burned 277,214 tons of higher sulfur coal in 2005; switching to lower sulfur coal would cost approximately \$2,772,140–\$6,930,350 extra per year. If 1,400 tons of SO₂ were reduced by switching from the current higher sulfur coal (one percent sulfur or approximately 1.6 lb SO₂/MMBtu) to lower sulfur coal (0.75 percent sulfur or approximately 1.2 lb SO₂/MMBtu) at the 2005 rate of coal consumption, associated costs would range from \$1,980–\$4,950/ton SO₂ with an average cost of \$3,465/ton SO₂. NCDAQ determined that the cost for add-on control technology for these units ranges from \$12,055 to \$100,961 /ton SO₂.

Without documentation to support these cost estimates, we are unable to provide informed comments on their validity or on the conclusions upon which they were based:

NCDAQ concluded that there are no cost-effective controls available for these units at this time within the cost threshold established for this reasonable progress assessment. Although NCDAQ has concluded that there are no cost-effective controls for this reasonable progress period, the State acknowledges that the emissions from Blue Ridge Paper Products impact North Carolina's inland Class I areas. NCDAQ notified the company that although additional controls are not required during this implementation period, the State may require the installation and operation of controls for future

implementation periods. NCDAQ is committed to working with this company over the next review period and encouraging the company to modernize some of its processes with more efficient equipment with lower emissions.

While we commend NDAQ for its acknowledgement that additional control measures may be required in the future, that does not relieve NDAQ and EPA of its responsibility to conduct a valid four-factor RP analysis and make that analysis available for public review. We recommend that EPA defer action on the RP analysis for BRPP until such time that a valid four-factor analysis is provided for public review.

We appreciate the opportunity to work closely with the NCDAQ and EPA Region 4 to make progress toward achieving natural visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Don Shepherd at (303) 969-2075.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol McCoy", written in a cursive style.

Carol McCoy
Chief, Air Resources Division

cc:

Sheila Holman, Director
Air Quality Division
North Carolina Department of Environment and Natural Resources
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Raleigh, NC 27699-1641