

As required by the regional haze rule 40 CFR 51.308, the North Carolina Division of Air Quality (NCDAQ) must make available a summary of the comments received on the initial draft Regional Haze State Implementation Plan (SIP) and the agency's anticipated responses. Below is the summary of the Federal Land Managers' comments received and the anticipated responses.

Summary of Federal Land Managers' comments

1. The US Forest Service requested that the SIP discuss how emissions from sources in North Carolina will affect visibility in Class I areas outside of North Carolina, specifically James River Face and Cohutta Wildernesses.

NCDAQ Response: The NCDAQ has worked in close partnership with all other VISTAS states throughout the regional haze SIP development process. This partnership has included the exchange of data on both emissions sources and Class I areas. Although not included in the pre-hearing draft document, the NCDAQ will include some discussion of North Carolina's impact on other Class I areas in its final submittal.

2. The US Forest Service requested that the document list all of the BART eligible sources (inside and outside of North Carolina) that could impact the Class I areas in North Carolina, and the results from the final BART determinations.

NCDAQ Response: The BART sources within North Carolina are listed, as are the results of the final BART determinations. The BART determinations for other states are the responsibility of the state that the source is located. The NCDAQ will include in its final submittal a summary of BART determinations that are available at the time the final submittal is composed for sources in other states that impact the North Carolina Class I areas.

3. The US Forest Service requested that emissions reductions at Blue Ridge Paper be accomplished before 2018 because of visibility impacts at Shining Rock Wilderness. The US Forest Service noted that the emission reduction techniques examined need to consider at a minimum the following: manufacturing efficiencies, fuel switching, and installing one or more appropriate control devices. They are recommending a facility-wide emission reduction plan be developed by 2013 and the emission control measures be fully implemented before 2018.

NCDAQ Response: Although the NCDAQ has concluded that for this reasonable progress period there are no cost-effective controls, the agency acknowledges that the emissions from Blue Ridge Paper Products do have impacts on the Class I areas located in the mountains. The NCDAQ has notified the company that although additional controls are not being required this planning period, future-planning periods may require controls to be installed. The NCDAQ is committed to work with this company over the next review period and to encourage the company to modernize some of its processes with more efficient, less polluting equipment.

4. The US Forest Service notes that it appears the current prescribed fire smoke management techniques implemented in North Carolina are adequate to protect visibility in the Class I areas. If NCDAQ concurs, the US Forest Service suggests the NCDAQ note this finding in the final SIP. They also request that any reference or citation of the SMP maintain maximum flexibility to modify the North Carolina SMP without having to go through a lengthy SIP review cycle.

NCDAQ Response: The SIP notes that the NCDAQ is currently working with the North Carolina Division of Forest Resources to develop a smoke management program and that we anticipate the resulting plan will be sufficient to satisfy the relevant directives. Changes to the SMP would not have to go through the SIP review cycle.

5. The US Fish and Wildlife Service and National Park Service believe that reasonable progress control measure costs should not be limited to levels associated with North Carolina's Clean Smokestacks Act. Rather, higher costs should be considered for sources whose emissions affect visibility on a greater frequency or magnitude. Specifically, they believe control measures should be identified for Blue Ridge Paper and implemented by 2018.

NCDAQ Response: The control measure cost levels associated with the Clean Smokestacks Act were established by the North Carolina General Assembly after long and careful consideration of adequate protections for both the lives and livelihood of North Carolina's citizens. It was a NCDAQ policy decision that this benchmark was both appropriate and adequate to apply to control measures for visibility improvements.

6. US Fish and Wildlife Service and National Park Service believe that PCS Phosphate-Aurora has not adequately demonstrated that control costs are prohibitive, and request that additional control efficiencies be analyzed. Specifically, they believe that a cesium catalyst at sulfuric acid plants 3 and 4 should be fully evaluated, noting that the greater level of control could reduce the cost per ton.

NCDAQ Response: PSC Phosphate has submitted a PSD application to the NCDAQ. According to this application, the facility plans to shut down sulfuric acid plants 3 and 4 and build a new plant 7. It would not make sense for the facility to put on controls at these two units if they will be shutdown in the near future.

7. The US Fish and Wildlife Service and National Park Service recommend that the State "certify" the Smoke Management Plan.

NCDAQ Response: NCDAQ intends to certify the SMP as a separate action from the regional haze SIP once the SMP has been fully reviewed by all relevant parties.

8. The US Fish and Wildlife Service and National Park Service had 14 general comments, including typographical errors and requests for clarity.

NCDAQ Response: The pre-hearing draft version of the regional haze SIP has addressed most of these general comments in the pre-hearing draft SIP.