

October 12, 2021

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Penobscot Indian Nation

Rhode Island

St. Regis Mohawk Tribe

Vermont

Randy Strait

North Carolina Department of Environmental Quality, Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

RE: Pre-hearing draft of the Regional Haze State Implementation Plan (SIP) for North Carolina Class I Areas for the Second Planning Period (2019 – 2028)

Dear Mr. Strait:

The Mid-Atlantic/Northeast Visibility Union (MANE-VU) appreciates the opportunity to comment on the North Carolina Department of Environmental Quality, Division of Air Quality's pre-hearing draft Regional Haze State Implementation Plan for the Second Implementation Period dated August 30, 2021 (hereinafter, the pre-hearing draft). MANE-VU is the regional visibility planning organization of the air agencies in the Mid-Atlantic and Northeast. MANE-VU consists of eleven states, two tribal nations, and the District of Columbia. It coordinates regional haze planning activities to help its members reduce visibility impairment at Class I areas in the MANE-VU region in furtherance of achieving the national visibility goals of EPA's Regional Haze Rule (RHR). To facilitate reasonable progress in visibility protection at its own Class I areas, and at all Class I areas throughout the U.S., MANE-VU is providing comments on the pre-hearing draft.

North Carolina's pre-hearing draft is of interest to MANE-VU because North Carolina emissions were identified by MANE-VU to significantly contribute to visibility impairment at Class I areas in the region. MANE-VU consulted with North Carolina and other states identified as "contributing" and North Carolina was included in the list of states receiving the MANE-VU Inter-RPO "Ask" for contributing states.¹ The North Carolina response and resolution to this Ask must be described in its draft regional haze SIP for review and action by EPA and Federal Land Managers (FLMs) prior to approval. MANE-VU's comments below relate to meeting the MANE-VU Inter-RPO Ask.

MANE-VU Class I Areas

Acadia National Park
Maine

Brigantine Wilderness
New Jersey

Great Gulf Wilderness
New Hampshire

Lye Brook Wilderness
Vermont

Moosehorn Wilderness
Maine

Presidential Range
Dry River Wilderness
New Hampshire

Roosevelt Campobello
International Park
Maine/New Brunswick,
Canada

¹ *Statement of the Mid-Atlantic/Northeast Visibility Union (MANE-VU) States Concerning a Course of Action in Contributing States Located Upwind of MANE-VU Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)*, August 25, 2017. Available at <https://otcair.org/MANEVU/Upload/Publication/Formal%20Actions/MANE-VU%20Inter-Regional%20Ask%20Final%208-25-2017.pdf>.

MANE-VU Ask

MANE-VU's technical analysis identified haze-impairing emissions from North Carolina and other upwind states as reasonably anticipated to contribute to visibility impairment at MANE-VU Class I areas. Based on this analysis, MANE-VU developed a "MANE-VU Ask" that was sent to North Carolina and the other identified states with five requests for consideration during the upwind states' second haze SIP planning effort. MANE-VU is now providing below our overarching perspective on how well North Carolina's pre-hearing draft addresses each of these areas.

Ask #1: EGUs ≥ 25 MW with installed controls, ensure that controls are run year round.

Consistent with this Ask, MANE-VU notes that there is an enforceable agreement requiring Duke Energy to continuously operate NO_x and SO₂ controls on GC Allen Units 1 and 2 until their retirement in 2024, as described on page 124 of the pre-hearing draft.

Ask #2: For emissions sources having a 3.0 Mm⁻¹ impact or greater at MANE-VU Class I areas, perform a four-factor analysis.

Kapstone Kraft Paper Corporation (EIS Facility ID 8048011) was originally identified by MANE-VU technical analysis as a facility with the potential for 3.0 Mm⁻¹ impact or greater at one or more of MANE-VU's Class I areas. However, after North Carolina identified an input error made by MANE-VU, subsequent MANE-VU analysis showed that this facility's impact was less than 3.0 Mm⁻¹. Because no other individual North Carolina emissions units were identified as having an impact of 3.0 Mm⁻¹ or greater at MANE-VU's Class I areas, Ask #2 is not applicable to North Carolina.

Ask #3: Ultra-low sulfur fuel oil standard

North Carolina did not address the MANE-VU ultra-low sulfur fuel oil Ask. MANE-VU respectfully re-iterates its request of North Carolina to adopt ultra-low sulfur fuel oil standards as part of its long-term strategy or demonstrate in its SIP why it would not be feasible to do so. For distillate oil, this would be essentially the equivalent of on-road diesel, which is already widely available. We note that all MANE-VU states have successfully adopted low sulfur fuel oil requirements.

Ask #4: EGUs and other large sources, pursue enforceable mechanisms to lock in lower emission rates.

MANE-VU notes the enforceable agreements to reduce NO_x and SO₂ emissions as described in Section 7.2.2.2 of North Carolina's pre-hearing draft.

Ask #5: Energy efficiency and clean technologies

MANE-VU recognizes the efforts that North Carolina has made in the area of renewable energy and energy efficiency as described in Section 7.2.7.1 of the pre-hearing draft.

Thank you for your efforts and your consideration of these comments. If you would like further clarification or discussion on any of these comments, please contact the MANE-VU Lead Manager Paul Miller (pmiller@nescaum.org) or the Chairs of the MANE-VU Technical Support Committee, Sharon Davis of the New Jersey Department of Environmental Protection (sharon.davis@dep.nj.gov) and David Healy of the New Hampshire Department of Environmental Services (david.s.healy@des.nh.gov).

Sincerely,

Sharon Davis, New Jersey Department of Environmental Protection

David Healy, New Hampshire Department of Environmental Services

Co-Chairs, MANE-VU Technical Support Committee