



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Michael F. Easley, Governor

William G. Ross, Jr., Secretary
B. Keith Overcash, P.E., Director

December 13, 2007

Marisue Hillard, Forest Supervisor
National Forests in North Carolina
USDA, U. S. Forest Service
160A Zillicoa Street
Asheville, NC 28801-1082

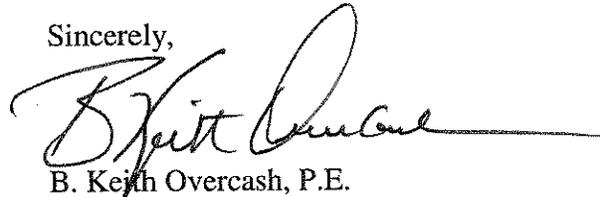
Dear Ms. Hillard:

Thank you for your comments dated October 9, 2007, on the pre-draft version of the Regional Haze State Implementation Plan (SIP) for North Carolina Class I areas. Since you and your staff shared with my staff many of your concerns in September, most of your comments could be addressed in the pre-hearing draft released for public comment on October 12, 2007.

Enclosed with this letter is our response to your comments. The North Carolina Division of Air Quality plans to submit its final Regional Haze SIP by December 17, 2007, the statutory deadline for regional haze plans. We hope to continue to work with you and your staff in the future as we monitor the progress in the North Carolina Class I areas of reaching natural background visibility conditions.

If you should have any questions, please contact Laura Boothe of my staff at (919) 733-1488 or laura.boothe@ncmail.net.

Sincerely,



B. Keith Overcash, P.E.

BKO:lab

Enclosure

CC: Laura Boothe
Kay Prince, USEPA Region 4
Bill Jackson, USFS
Charles Sams, USFS

Response to Comments received by U. S. Forest Service

USFS Comment: “The SIP does not 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. The information is contained in the Area of Influence (AOI) analyses and it would be appropriate to discuss how emission reductions planned for North Carolina sources will affect visibility at Class I areas in other states.”

NCDAQ Response: Although the SIP narrative did not include a discussion about the impacts of North Carolina sources on Class I areas outside of the State, Appendix J did include letters to our neighboring states discussing North Carolina’s sources impacts on their Class I areas. The NCDAQ will include a brief discussion in the SIP narrative and/or the Appendix H narrative about the impacts of North Carolina sources on Class I areas outside of North Carolina.

USFS Comment: “The document should 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. The results should include a table of emissions before and after BART controls are installed.”

NCDAQ Response: As you know, the NCDAQ only has authority over sources located within North Carolina. Therefore, we only have control over ensuring that the BART determinations we are responsible for are completed and the results available at the time the final SIP is submitted. The states in the southeast are all at different stages of their SIP development and may not have their BART determinations completed in time to include with our final SIP. The NCDAQ has contacted our neighboring states requesting the information you requested be included in our SIP. Any information we obtain will be included with Appendix L.

USFS Comment: “We believe emissions reductions at Blue Ridge Paper should be accomplished before 2018 because emissions from this facility clearly have a significant impact to visibility at Shining Rock Wilderness. We 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 available for Blue Ridge Paper Products, 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.

USFS Comment: “...we agree with your finding that wildland fire emissions are not a significant contributor to visibility impairment at the Class I areas and further emission reduction techniques from prescribed fires are not needed before 2018. Based on this finding, it appears the current prescribed fire smoke management techniques implemented in North Carolina are adequate to protect visibility in the Class I areas. If you concurs, we suggests your agency note this finding

in the final SIP. Also, you may want to note that your agency and the North Carolina prescribed fire community are continuing to work together to refine the smoke management techniques to address ecological, human health and welfare needs.” “.....any reference or citation of the SMP [Smoke Management Program] should maintain maximum flexibility to modify the North Carolina SMP on an as needed basis without having to go through a SIP revision, or waiting for long periods of evaluation such as prescribed by the Regional Haze 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. Since the SMP is not being submitted as part of the Regional Haze SIP, changes to the SMP would not have to go through the SIP review process.