United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225

TAKE PRIDE® IN AMERICA

IN REPLY REFER TO:
N3615 (2350)

August 17, 2011

Rick Boddicker
PMB 2020
South Dakota Department of Environment and Natural Resources
Joe Foss Building
523 E Capitol
Pierre, South Dakota 57501

Dear Mr. Boddicker:

The National Park Service (NPS) has reviewed the South Dakota Regional Haze State Implementation Plan (SIP) that was submitted to the Environmental Protection Agency (EPA) on January 21, 2011, and revisions to the SIP that you provided on July 21, 2011.

We agree with the Department of Environment and Natural Resources (DENR)'s analysis that sulfate, organic carbon, and nitrate are the major contributors to visibility impairment at Badlands and Wind Cave National Parks in South Dakota and that, based on regional modeling by the Western Regional Air Partnership (WRAP), the major sources of sulfur dioxide (SO_2) are outside South Dakota. We note that the WRAP modeling included presumed SO_2 controls for the Gerald Gentleman Station in Nebraska under the Best Available Retrofit Technology requirements. Nebraska is not proposing to implement these controls. As a result, it is likely that the sulfate reductions illustrated in Figure 7-1(a) and (b) and the visibility improvement goals set by South Dakota based on the WRAP modeling will not be met. NPS is recommending SO_2 controls at Gerald Gentleman Station to EPA and Nebraska. We encourage South Dakota DENR to consult with Nebraska on reducing contributions from the Gerald Gentleman Station to Badlands and Wind Cave National Parks.

As part of the reasonable progress analysis, DENR completed a four factor analysis of potential controls for the wet kilns #4 and #5 at the Dakotah Cement plant. We recommend that the reasonable progress analysis should also evaluate controls for the larger kiln #6. As discussed in our January 27, 2003, comments to DENR on the Prevention of Significant Deterioration Permit for Dakotah Cement kiln #6, we believe that Selective Non-catalytic Reduction technology is a feasible option for cement kilns.

We appreciate the opportunity to work closely with South Dakota DENR to improve visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Don Shepherd of my staff at (303) 969-2075.

Sincerely,

John Bunyak, Chief
Policy, Planning and Permit Review Branch

cc:

Gail Fallon
Air Quality Planning Unit (8P-AR)
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129