



File Code: 2580

Date: October 26, 2007

Myra Reece
SC Department of Health and Environmental Control
Bureau of Air Quality
2600 Bull St.
Columbia, SC 29201-1797

Dear Ms. Reece:

On September 7, 2007, we received a draft implementation plan from the State of South Carolina that describes your proposal to improve air quality regional haze impacts at mandatory Class I areas in your state. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I wilderness areas and parks.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service has received and conducted a substantive review of your proposed Regional Haze Rule implementation plan. Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the ability to approve the document. The Forest Service's participation in the State of South Carolina's administrative process does not waive any legal defenses or sovereignty rights it may have under the laws of the United States, including the Clean Air Act and its implementing regulations.

Our review focused on eight basic content areas which reflect priorities for the Forest Service. We have attached comments to this letter. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Bill Jackson, Air Quality Specialist, at (828) 257-4815 or Charles Sams, Regional Air Quality Program Manager, at (307) 578-8241.

Again, we appreciate the opportunity to work closely with the State of South Carolina. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

MARISUE HILLIARD
Forest Supervisor

cc: MaeLee Hafer, Charles E Sams, Ann E Mebane



**National Forests in South Carolina Comments
SC Regional Haze State Implementation Plan (SIP)**

1. The SIP does not discuss how emissions from sources in South Carolina will affect visibility in Class I areas outside of South Carolina; specifically Joyce Kilmer-Slickrock, Linville Gorge, and Shining Rock and Cohutta Wildernesses. The information is contained in the Area of Influence (AOI) analyses and it would be appropriate to discuss how emission changes planned for South Carolina sources will affect visibility at Class I areas in other states. There are three sections of the Regional Haze Rule that we believe support our request:
 - a. 51.308 (d)(3) Long term strategy. "Each State... must submit a long-term strategy that addresses regional haze visibility impairment...for each mandatory Class I Federal area located outside the State which may be affected by emissions from the State. The long-term strategy must include enforceable emissions limitations, compliance schedules, and other measures as necessary to achieve the reasonable progress goals established by States having mandatory Class I Federal areas."
 - b. 51.308 (d) (3) (i) "Where the State has emissions that are reasonably anticipated to contribute to visibility impairment in any ... Class I area located in another State..., the State must consult with the other State(s) in order to develop coordinated emission management strategies."
 - c. 51.308 (d) (3) (ii) "If the State has participated in a regional planning process, the State must ensure it has included all measures needed to achieve its apportionment of emission reduction obligations agreed upon through that process."

Section 10, 'InterState Consultation on SC Contribution to Visibility Impairment in Class I Federal Areas in Neighboring States', should include a list of South Carolina sources the AOI identified as having a potential to impact the Class I areas in Georgia and North Carolina. The list needs to include the pollution reductions that are anticipated at each source before 2018. The SIP narrative should also include a summary of the cost/benefit analysis performed for each facility.

Currently, we believe the Duke Energy Lee facility (Anderson County) should be identified and discussed. The VISTAS emissions inventory indicates this facility emitted about 9,000 tons of sulfur dioxide in 2002. Our discussion with your staff has revealed this source will not be making any reductions under the Clean Air Interstate Rule, and the facility emissions of sulfur dioxide will remain the same (the VISTAS emissions inventory shows an increase of 6,763 tons per year) by 2018. We believe it would be appropriate to identify that this source is probably contributing to visibility impairment to Class I areas outside of South Carolina, and the source should anticipate making significant reductions either before or during the next Regional Haze Planning cycle.

2. The numbers used to produce Figure 7.2.3-1 showing decreasing sulfur dioxide emissions between 2009 and 2018 contradicts the numbers given in Tables 7.2.3-1 and 7.2.3-2. The tables indicate emissions will increase for all the pollutants between 2009 and 2018, except nitrogen oxides. We have discussed this finding with your staff and have been advised the numbers in the tables are incorrect and the next version of the Regional Haze SIP will have the correct values.
3. In Appendix J there is a reference to a letter submitted on 8/6/2007 by Keith B. Overcash (State of North Carolina) requesting consultation regarding South Carolina sources affecting North Carolina's Class I Areas. The letter was not present in the Appendix and should be included. Also, we are recommending the consultation meeting results be included in Section 10 and note any sources identified as having an impact to the Class I areas in North Carolina.
4. As stated in the draft SIP, we agree with your finding that wildland fires 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 upon this finding, it appears the current prescribed fire smoke management techniques implemented in South Carolina are adequate to protect visibility in the Class I areas. If you concur, we suggest your agency note this finding in the final SIP. Also, you may want to note that your agency and the South Carolina prescribed fire community are continuing to work together to refine the smoke management techniques to address ecological, human health and welfare needs.

On October 9, 2007, we discussed with your staff if the South Carolina Smoke Management Program (SMP) should be included as an Appendix or referenced in the Regional Haze SIP. Our recommendation is that any reference or citation of the SMP should maintain maximum flexibility to modify the South 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.

5. The draft SIP does note a "reasonable progress report will evaluate the progress ... for each mandatory Class I Federal area located outside South Carolina that may be affected by emissions from South Carolina sources." We recommend your agency explore the possibility of conducting a joint technical analysis with North Carolina, Georgia, Tennessee, Alabama, Kentucky, Virginia, West Virginia, Ohio, Pennsylvania, Maryland and the Federal Land Managers. Cooperation among these States would assist in developing the reasonable progress reports for all of the Class I areas in the southern Appalachians from West Virginia to northern Georgia. If all parties are agreeable to the idea then it should be noted in the final SIP. We believe it will be necessary for all the States listed to track how the actual emissions are changing by facility and source category between 2002 and mid-course review, and to what extent has visibility at the Class I areas in the southern Appalachians changed by the mid-course review.