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Date: December 10, 2007

Mr. Barry R. Stephens, P.E.
Director, Tennessee Division of Air Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243-1531

Dear Mr. Stephens:

On November 8, 2007, we received the completed draft implementation plan from the State of Tennessee 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 Tennessee'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 Tennessee. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

/s/ Marisue Hilliard
MARISUE HILLIARD
Forest Supervisor



cc: Charles E Sams
Ann E Mebane

**National Forests in North Carolina Comments on the
Draft Tennessee Regional Haze State Implementation Plan (SIP)**

1. The SIP should list for each coal-fired power plant the emission amounts prior to and after the Clean Air Interstate Rule (CAIR) have been implemented in Tennessee. The following example table may serve as an example to follow:

Table . TN Coal Fired Power Plants’ Air Pollution Control Systems: Existing and after CAIR

		Size			Emissions with Existing Control Equipment			Emissions After Implementation of CAIR		
Facility Name and #	Unit ID#	MW	Mmbtu /hr	NSR Permit?	PM	NO _x	SO ₂	SO ₂	Projected Control Equipment	Projected Year to Install

2. Figure 7.2.4-4 showing the “Reasonable progress assessment for the 20% best days at Joyce Kilmer-Slickrock” is missing from the draft SIP.
3. The SIP does not discuss how emissions from sources in Tennessee will affect visibility in Class I areas outside of Tennessee; specifically Cohutta, Georgia; Linville Gorge, and Shining Rock, North Carolina; and Sipsey, Alabama. The draft information we have suggests Tennessee sources will have little influence to visibility at Caney Creek and Upper Buffalo in Arkansas, and Hercules Glades in Missouri. The information is contained in the Area of Influence (AOI) analyses and it would be appropriate to present tabular information and discuss how emission changes planned for Tennessee 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."

We would suggest the tabular information and discussion be placed in Section 7 and include only those sources with 1% or greater contribution level based upon the Area of Influence (AOI) analysis. Also, section 7 should be renamed “Relative Contributions to Visibility Impairment: Geographic Areas of Influence for Class I areas in Tennessee and Neighboring States.” The SIP narrative should include a summary of the cost/benefit analysis performed for each facility following the 4-factor analysis procedures. The following example table was taken from the draft Virginia Regional Haze State Implementation Plan.

Table 7.7.4-2: Units within VA with Visibility Impairment Contributions of at least 1%							
County	Plant ID	Plant Name	Point ID	Unit Description	2002 SO ₂ tpy	2018 SO ₂ tpy	% contribution
Swanquarter							
Isle of Wight	51-093-00006	International Paper Company	4	#7 Boiler 543 tmbtu/hr burning coal, #6 oil, wood, and TRS gases	3,720	4,299	1.19%
Linville Gorge							
Russell	51-167-00003	AEP-Clinch River	1	238 MW EGU coal fired using approximately 0.8% S coal.	8,158	10,014	4%
Russell	51-167-00003	AEP-Clinch River	2	238 MW EGU coal fired using approximately 0.8% S coal.	8,115	10,131	4%
Russell	51-167-00003	AEP-Clinch River	3	238 MW EGU coal fired using approximately 0.8% S coal.	8,804	9,911	4%
Dolly Sods							

- The final SIP should include in the text, and footnote any appropriate tables, that the Tate and Lyle Ingredients America (also noted at A.E. Staley Manufacturing Company) will be making a 62 percent reduction following a permit action and no further reduction will be required under reasonable progress. Likewise, the final SIP should say the Intertrade Holdings, Inc. facility has removed the acid plant (#6) from service and there has been a minor modification to the Title V Permit and the current SO₂ allowable emissions from the entire facility are 63.0 TPY.
- The draft SIP did not discuss the results of the 4-factor analysis for the U.S. Department of Energy facility (Y-12). The 2,336 tons per year of sulfur dioxide emissions (2018 estimate) has the potential to impact visibility at Joyce Kilmer-Slickrock Wilderness based upon the AOI analysis
- 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 Tennessee 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 Tennessee prescribed fire community are continuing to work together to refine the smoke management techniques to address ecological, human health and welfare needs.

Currently, Tennessee has not adopted a smoke management program and it is possible

that only best smoke management practices or techniques will be adopted. Therefore, we offer the following suggested changed to a paragraph in section 7.9:

As discussed in Section 2.4 and demonstrated in Figures 2.4-1 and 2.4-2, elemental carbon (sources include agriculture, prescribed wildland fires, and wildfires) is a relatively minor contributor to visibility impairment at the Class I areas in Tennessee. However, TDEC-APC is currently working with the TN Division of Forestry to develop a smoke management program, practices, or techniques. TDEC-APC will not make any smoke management plan/practices/techniques a part of its SIP due to flexibility reasons. It would simply be too cumbersome to formally revise the SIP for minor changes to a smoke management program or plan. Any resulting efforts would simply be offered as additional assurances that the emission reductions in other source categories would “carry the day” in effectively solving regional haze issues.

7. The draft SIP does note a “reasonable progress report will evaluate the progress made towards the reasonable progress goal for each mandatory Class I area located within Tennessee and in each mandatory Class I area located outside Tennessee which may be affected by emissions from within Tennessee.” We recommend your agency explore the possibility of conducting a joint technical analysis with North Carolina, Georgia, South Carolina, 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.