



United States Department of the Interior



FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:

FWS/ANWS-AR-AQ

August 27, 2009

Mr. James P. Johnston, Program Manager
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch, Planning and Support Program
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Dear Mr. Johnston:

On June 10, 2009, the State of Georgia published the Proposed Georgia State Implementation Plan (SIP) for Regional Haze. This plan describes improvements to air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent reviews 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 the most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS), in coordination with the National Park Service (NPS), had received and conducted a substantive review of your proposed Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

On February 11, 2009, we submitted comments for you to consider in the development of the Proposed State Implementation Plan. The June 10, 2009, proposed SIP adequately addressed those comments. With this letter, we are providing additional comments regarding Best Available Retrofit Technology provisions that were introduced in the new version of the SIP. We ask that these comments be placed in the official public record, and that the State consider these issues as it proceeds with its regulatory process.



Again, the State of Georgia is commended for the high quality of work and clear and concise writing of proposed Regional Haze SIP. We compliment you on your hard work and dedication to significant improvement in our nation's air quality related values and visibility.

Sincerely,



Sandra V. Silva, Chief
Branch of Air Quality

for

Enclosure (1)

cc:

James A. Capp, Air Branch Chief
Georgia Department of Natural
Resources
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Kay Prince, Chief, Air Planning Branch
US EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Michele Notarianni
US EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Annette Sharp, Executive Director
CENRAP
10005 S. Pennsylvania, Ste. C
Oklahoma City, Oklahoma 73159

VISTAS Technical Coordinator
2090 U.S. 70 Highway
Swannanoa, North Carolina 28778

Brian McManus, Deputy Chief
FWS Branch of Fire Management
National Interagency Fire Center
3833 South Development Ave.
Boise, Idaho 83705

Jon Andrew, Chief,
National Wildlife Refuge System
USFWS Southeast Region
1875 Century Center
Atlanta, Georgia 30345

George Constantino, Project Leader
Okefenokee National Wildlife Refuge
Route 2, Box 3330
Folkston, GA 31537

Jane Griess, Project Leader
Wolf Island National Wildlife Refuge
Savannah Coastal Refuges
Parkway Business Center
1000 Business Center Drive, Suite 10
Savannah, Georgia 31405

James Burnett, Refuge Manager
St. Marks National Wildlife Refuge
P.O. Box 68
St. Marks, Florida 32355

James Kraus, Refuge Manager
Chassahowitzka National Wildlife
Refuge
1502 SE Kings Bay Drive
Crystal River, Florida 34429-4661

U.S. Fish and Wildlife Service and National Park Service Comments Regarding Georgia Draft Regional Haze Rule State Implementation Plan

August 27, 2009

On June 10, 2009, the State of Georgia submitted a Proposed State Implementation Plan (SIP) Revision for the Regional Haze Program, pursuant to the requirements codified in Federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS) and the National Park Service (NPS).

The air program staff of the FWS has conducted a substantive review of the Georgia draft plan and provided comments on February 10, 2009. Georgia addressed our previous comments. These additional comments listed below pertain to the Best Available Retrofit Technology provisions introduced in the June 10, 2009, Proposed SIP.

We are providing these comments to the State and ask that they be placed in the official public record. We look forward to your response as per section 40 CFR 51.308(i)(3), and we are willing to work with the Georgia Environmental Protection Division (Georgia EPD) staff towards addressing any of the issues discussed in this letter. For further information, please contact Tim Allen with FWS at (303) 914-3802.

Overall Comments

Overall, the Georgia draft Regional Haze State Implementation Plan (SIP) continues to be comprehensive and well written. This SIP is a good example for other states to follow.

Best Available Retrofit Technology (BART) Provisions of the Georgia Regional Haze SIP

Appendix H of the Georgia Regional Haze State Implementation Plan – Draft (RH SIP) contains BART Exemption Modeling Reports for most BART-eligible sources. However, such reports are not included for the Owens Coming or Prayon, Inc., facilities. Please provide these reports in the record as evidence to confirm that neither of the above facilities impact visibility at any Class I area by 0.5 deciviews or greater.

Regarding the BART determination for Interstate Paper-Riceboro, Table 7.7.3-1, under the heading "Required Control Option" for the Lime Kiln states: "No cost effective control options Available." There are cost-effective (i.e., cost per ton) NO_x control options available for the lime kiln; namely, SNCR-NH₃ based (\$740/ton) and SNCR-Urea based (\$1,017/ton). No visibility improvement scenarios were developed for either of these alternatives. However, an admittedly very rough (and likely inaccurate) visibility improvement estimate could be obtained by proportionally comparing the 74.6 tons of NO_x reduction using the SNCR-NH₃ alternative with an annual cost of \$26,461 to the 369.5 tons of SO₂, NO_x, and PM₁₀ reduced in the Power Boiler (which was modeled to show a 0.116 deciview improvement), to show a \$1.13 million per deciview cost [(\$26,461/((74.6/369.5)*0.116)]. The \$1.13 million/deciview is considered very reasonable when compared to other BART determinations in the range of \$10 - \$15 million per deciview of visibility improvement. In summary the SNCR-NH₃ NO_x control alternative should be seriously considered as BART for the lime kiln.

It should be noted that only summary cost data were presented. More detailed cost information should be included in BART determinations, especially of competitive alternatives, so that third-party reviewers can more thoroughly review the costs and methodologies that were used.