



United States
Department of
Agriculture

Forest
Service

Superior
National
Forest

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File Code: 2580-2

Date: February 24, 2010

Rick Boddicker
Senior Environmental Scientist
SD DENR
523 East Capitol
Pierre, SD 57501

Dear Mr. Boddicker:

On January 15, 2010, the State of South Dakota submitted a draft implementation plan describing your proposal to improve 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 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 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. Participation by the Forest Service in the State of South Dakota'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.

As outlined in a letter to South Dakota dated November 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Manager agencies, and we have attached comments to this letter associated with these priorities. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Eastern Region Air Resource Specialist Trent Wickman at (218) 626-4372 or Rocky Mountain Region Air Resource Specialist Jeff Sorkin at (406) 329-3672.

Again, we appreciate the opportunity to work closely with the State of South Dakota. 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/ James W. Sanders
JAMES W. SANDERS
Forest Supervisor



cc: Charles E Sams
Jeff A Sorkin
Terry Svalberg
Amy Platt
Don Shepherd
Tim Allen

Technical Comments

- 1) In regards to your approach to estimating natural conditions, for consistency, we would prefer that South Dakota (SD) use the standard Western Regional Air Partnership/ Technical Support System (WRAP/TSS) natural conditions values unless there is a justification for your alternate values.
- 2) We want to be involved in the development of your smoke management plan (SMP). We will give a local Forest Service contact when requested.
- 3) We note that high organic carbon (OC) concentrations don't necessarily mean fire impacts, as noted in the draft SIP. Please provide more analysis on individual high OC days (for example use back trajectories) to see where the OC came from. Another approach that could be used would compare the seasonality of prescribed fire with wildfire. Using calendar quarters are not a fine enough temporal resolution for this task. For example SD could get prescribed fire activity info from the burners in the state and see if it matches measured high OC impact days.
- 4) We commend SD for selecting selective catalytic reduction as BART for Big Stone.
- 5) Please show how big a part of the state's point source emission inventory Big Stone is.
- 6) It is our view that the regional haze regulations require a four factor analysis. Depending on the answer to question 5) above, a simple analysis may be justified. Please make use of information and analyses provided by WRAP.