



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

SHEILA C. HOLMAN
Director

June 30, 2016

Heather McTeer Toney, Regional Administrator
USEPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Characterization of Air Quality Near Facilities Subject to the SO₂ Data Requirements Rule

Dear Ms. Toney,

The Data Requirements Rule for the 2010 Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (DRR) requires air agencies to submit by July 1, 2016, the methodology to be used to characterize air quality near facilities subject to the rule. Pursuant to this rule and §51.1203(b), this letter provides the required information from the state of North Carolina, including the three local air pollution control programs.

There are seven facilities within state jurisdiction whose emissions exceeded the 2,000 tpy threshold in 2014. These facilities and emissions are identified in Attachment 1. It should be noted that one of these facilities, CPI-USA North Carolina – Southport Plant has already been evaluated in response to the SO₂ Designation Consent Decree.¹

Additionally, the Division of Air Quality (DAQ) received third party modeling information for two sources whose emissions are below the threshold. The inventory information for these two facilities is included: Duke Energy Carolinas - Allen Steam Station in Gaston County and Duke Energy Progress – Asheville Steam Electric Plant in Buncombe County. The Duke Energy Progress – Asheville Steam Electric Plant falls under the purview of the Western North Carolina Regional Air Quality Agency. Therefore, DAQ plans to also characterize air quality near these facilities as part of the state's response to the DRR.

The local air pollution control programs, Western North Carolina Regional Air Quality Agency in Buncombe County, Forsyth County Office of Environmental Assistance and Protection and the Mecklenburg County Air Quality each do not have any SO₂ sources within their respective jurisdictions that exceed the 2,000 tpy threshold.

¹ 2010 1-Hour Sulfur Dioxide Boundary Recommendation for Brunswick County and New Hanover County. Letters dated September 18, 2015 and April 19, 2016.

Heather McTeer Toney
DRR Characterization Letter
June 30, 2016

Your letter to Secretary van der Vaart of March 18, 2016 confirmed that EPA agrees with North Carolina's list of facilities affected by the SO2 Data Requirements Rule.

The attached tables contain the affected facilities and the proposed methodology for characterizing air quality near these facilities. Pursuant to §51.1203(c) for those facilities for which monitoring is proposed, the monitor locations are included as part of North Carolina's Annual Monitoring Network Plan, which will be submitted to your agency on or about July 1, 2016. Pursuant to §51.1203(d) for those facilities for which modeling is proposed, the draft modeling protocols are included as appendices to this letter.

North Carolina remains committed to providing clean air quality to its citizens and to addressing any issues as they arise. I look forward to continuing to work with you and your staff on the implementation of this health based standard. Please contact me at (919) 707-8430 if you have any questions regarding this submittal.

Sincerely,



Sheila C. Holman, Director
Division of Air Quality, NCDEQ

SCH

Enclosures

Cc: Carol Kemker
Minor Barnette
David Brigman
Leslie H. Rhodes
Rick Gillam
Twunjala Bradley
Lynorae Benjamin
Scott Davis
Todd Rinck
Daniel Garver

Attachment 1.
 North Carolina Facilities Having SO₂ Emissions Exceeding 2,000 TPY

ID	County	Facility Name	NAICS	Inventory Yr	Actual Annual SO ₂ Emissions (tpy)	Analysis Approach
7300029	Person	Duke Energy Progress, LLC - Roxboro Plant	221112	2014	15,647.03	Monitor
4400159	Haywood	Blue Ridge Paper Products - Canton Mill	322121	2014	7,593.86	Monitor
8500004	Stokes	Duke Energy Carolinas, LLC - Belews Creek Steam Station	221112	2014	7,044.98	Model
1800073	Catawba	Duke Energy Carolinas, LLC - Marshall Steam Station	221112	2014	5,917.45	Model
1000067	Brunswick	CPI USA North Carolina - Southport Plant	221112	2014	4,090.00	Permit Limit/Monitor
0700071	Beaufort	PCS Phosphate Company, Inc. - Aurora	325312	2014	4,072.49	Monitor
7300045	Person	Duke Energy Progress, LLC - Mayo Facility	221112	2014	3,490.60	Model

Third-party Modeling Received

ID	County	Facility Name	NAICS	Inventory Yr	Actual Annual SO ₂ Emissions (tpy)	Analysis Approach
0628 (WNCRAQA)	Buncombe	Duke Energy Progress, Inc. - Asheville Steam Electric Plant	221112	2014	1,281.00	Model
3600039	Gaston	Duke Energy Carolinas, LLC - Allen Steam Station	221112	2014	1,718.20	Model