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January 15, 2016

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

Subject: List of Facilities Subject to SO₂ Data Requirements Rule

Dear Ms. Toney,

The Data Requirements Rule for the 2010 Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard requires air agencies to submit by January 15, 2016, a list identifying all sources within its jurisdiction with SO₂ emissions that exceeded the 2,000 ton per year (tpy) threshold based on the most recent emissions data. Pursuant to this rule and §51.1203(a), 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 exceed the 2,000 tpy threshold in 2014. These facilities and emissions are identified in the attachment. 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 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.

The rule also requires air agencies to identify any additional sources and their associated areas that may warrant air quality characterization. The DAQ performed a cluster analysis by evaluating all point sources emitting SO₂ listed in the 2014 inventory. In order to conduct this

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

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analysis, we developed a tool that would query a MySQL database that contained all of the emissions data. The query essentially contained two components in developing a cluster; first, it searched for all SO₂ point sources that emitted at least 100 tpy of SO₂ individually, and then it searched for other SO₂ sources in a 10 km circular radius around that facility.² Once the facility clusters were generated, the query located and summed all SO₂ emissions within it – including emissions from the original facility that the cluster was centered on -- and printed them to a table. The results of this query showed no clusters within a 10 km radius in which an individual facility's emissions below 2,000 tpy were collectively within a cluster above 2,000 tpy.

I am confident that DAQ has identified all SO₂ sources that could cause or contribute to a violation of the 2010 1-Hour SO₂ Primary Standard. These facilities are now subject to further analysis and characterization by either modeling or monitoring.

Please contact me at (919) 707-8430 if you have any questions regarding this submittal.

Sincerely,



Sheila Holman, Director
Division of Air Quality, NCDEQ

SCH/lpc

Enclosure

Cc: Beverly Banister
Minor Barnette
David Brigman
Leslie H. Rhodes

² The 10 km distance was chosen based on EPA's guidance for estimating the distance to maximum 1-hour impacts and the region of significant concentration gradients, excerpted from the March 1, 2011 Modeling Guidance for the 1-hour NO₂, National Ambient Air Quality Standard.

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North Carolina Facilities Having SO₂ Emissions Exceeding 2,000 TPY

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

Third-party Modeling Received

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

