Appendix F-1

VISTAS state to VISTAS state Consultation

F-1a TN letter to KYDAQ dated October 23, 2020

F-1b WV letter to KYDAQ dated November 6, 2020

F-1c GA letter to KYDAQ dated November 24, 2020

F-1d FL letter to KYDAQ dated December 18, 2020

F-1e NC letter to KYDAQ dated February 1, 2021

Appendix F-1a

TN letter to KYDAQ dated October 23, 2020

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

October 23, 2020

Melissa Duff
Director
Kentucky Division for Air Quality
300 Sower Boulevard
2nd Floor
Frankford, KY 40601

Subject: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Duff,

The purpose of this letter is to request that you share your state's reasonable progress evaluations for a source within Kentucky that contributes to visibility impairment in Class I federal areas (Class I areas) located within the State of Tennessee. These Class I areas are Great Smoky Mountains National Park and the Joyce Kilmer-Slickrock Wilderness Area[1]. Tennessee has a strong interest in improving air quality and visibility at these Class I areas and across the State.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in these mandatory Class I Federal areas to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

As a member of Visibility Improvement – State and Tribal Association of the Southeast (VISTAS), the regional planning organization for the southeastern United States, my staff within the Tennessee Division of Air Pollution Control (APC) have been working closely with your staff and expect to continue to do so. This collaborative approach to regional haze state implementation plan (SIP) development has been a highly productive endeavor. VISTAS states have leveraged internal resources throughout this process so that final regional haze plans will provide for significant visibility improvement by the end of this second planning period, 2028.

[1] Great Smoky Mountain National Park and the Joyce Kilmer-Slickrock Wilderness Area are both located in both Tennessee and North Carolina.

Below is a summary of the general process APC followed to determine which sources in Kentucky may be contributing to visibility impairment at Tennessee Class I areas in such a manner as to warrant a reasonable progress evaluation.

VISTAS initially used an Area of Influence (AoI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AoI analysis used the HYSPLIT Trajectory Model to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to be contributing to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector with the largest impact on visibility impairment were sulfur dioxide (SO2) and nitrogen oxides (NOx) from point sources.

Next, VISTAS states used the results of the AoI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMx) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 the majority of anthropogenic visibility impairment at Class I areas continues to be from point source SO2 and NOx emissions.

Using the PSAT data, VISTAS states identified for reasonable progress analysis the sources shown to have a sulfate or nitrate impact on one or more Class I areas that is greater than or equal to 1.00% of the total sulfate plus nitrate point source visibility impairment on the 20% percent most impaired days for that Class I area. While no facilities in Kentucky have a nitrate impact greater than 1.00%, one facility in Kentucky has a sulfate impact greater than 1.00% on at least one of Tennessee's Class I areas. The projected impacts from this facility has been the topic of informal communications between our respective planning staffs. Table 1 lists the Kentucky facility that has sulfate impacts greater than 1.00% and the provides SO2 emission rate used in the PSAT analysis for the facility.

Table 1: Kentucky Facilities with Greater Than 1.00% Sulfate Impact on Tennessee Class I Areas

Facility Name	Facility ID	Contribution to Visibility Impairment, Great Smoky Mountains	Contribution to Visibility Impairment, Joyce Kilmer-Slickrock	2028 Projected SO_2 Emissions
Tennessee Valley Authority – Shawnee Fossil Plant	21145-6037011	1.32%	1.38%	19,505 tpy

APC requests that you share with us your reasonable progress evaluation for this facility when it is completed. Such evaluation could include updated 2028 emissions estimates, imposition of federally-enforceable SO2 limitations such that the facility impacts to Tennessee Class I areas are less than 1.00%, other analyses or application of guidance indicating that current controls are sufficient for reasonable progress in this round of planning, results of four-factor analyses as described in 40 CFR 51.308(f)(2)(i), or other facility-specific information you deem pertinent to the improvement of visibility impairment at Great Smoky Mountain National Park and the Joyce Kilmer-Slickrock Wilderness Area. Please provide this information by December 15, 2020, so that it may be included in Tennessee's consultation draft of the regional haze SIP for the second planning period.

Your reasonable progress evaluation may be sent to the address shown on this letter or electronically to air.pollution.control@tn.gov.

Should your staff have any questions on this request or on Tennessee's regional haze state implementation plan development, please contact Jimmy Johnston at (615) 253-7319 or via email at james.johnston@tn.gov. I look forward to continuing this collaboration both directly and through VISTAS.

Sincerely,

Michelle W. Owenby
Director
Division of Air Pollution Control

c: Mike Abraczinskas, North Carolina Division of Air Quality
Randy Strait, North Carolina Division of Air Quality
Ben Cordes, Kentucky Division for Air Quality

Appendix F-1b

WV letter to KYDAQ dated November 6, 2020

west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475

Austin Caperton, Cabinet Secretary
dep.wv.gov

November 6, 2020

Ms. Melissa Duff
Director, Division for Air Quality
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, KY 40601

via email: Melissa.Duff@ky.gov

Re: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Duff,

The purpose of this letter is to request that you share your state's reasonable progress evaluation for a source within Kentucky that contributes to visibility impairment in Class I federal areas (Class I areas) located within the State of West Virginia. These Class I federal areas are the Dolly Sods Wilderness Area and the Otter Creek Wilderness Area, both of which are under the management of the United States Forest Service. West Virginia has a strong interest in improving air quality and visibility at these Class I federal areas and across the State.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

> The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

As part of the Visibility Improvement – State and Tribal Association of the Southeast (VISTAS) [1], the regional planning organization for the southeastern United States, my staff within the West Virginia Division of Air Quality (DAQ) have been working closely with your staff and

[1] https://www.metro4-sesarm.org/content/vistas-regional-haze-program

expect to continue to do so. This collaborative approach to regional haze state implementation plan (SIP) development has been a highly productive endeavor. VISTAS states have leveraged internal resources throughout this process so that final regional haze plans will provide for significant visibility improvement by the end of this second planning period, 2028.

Below is a summary of the general process DAQ followed to determine which sources in Kentucky may be contributing to visibility impairment at West Virginia Class I areas in such a manner as to warrant a reasonable progress evaluation.

VISTAS initially used an Area of Influence (AoI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AoI analysis used the HYSPLIT Trajectory Model[2] to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to contribute to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector with the largest impact on visibility impairment were sulfur dioxide and nitrogen oxides from point sources.

Next, VISTAS states used the results of the AoI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMX) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 most of the anthropogenic visibility impairment at Class I areas continues to be from point source SO_2 and NO_x emissions.

Using the PSAT data, VISTAS states identified for reasonable progress analysis the sources shown to have a sulfate or nitrate impact on one or more Class I areas that is ≥1.00% of the total sulfate plus nitrate point source visibility impairment on the 20% percent most impaired days for that Class I area. While no facilities in Kentucky have a nitrate impact ≥1.00%, one facility in Kentucky has a sulfate impact ≥1.00% on West Virginia's Class I areas. The projected impacts from this facility have been the topic of informal communications between our respective planning staffs. Table 1 lists the Kentucky facility that has a sulfate impact ≥1.00% and provides SO_2 emission rates used in the PSAT analysis for each facility.

Table 1: Kentucky Facilities with ≥1.00% Sulfate Impact on West Virginia Class I Federal Areas

Facility Name	Facility ID	Contribution to Visibility Impairment, Dolly Sods	Contribution to Visibility Impairment, Otter Creek	2028 Projected SO_2 Emissions
Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	21145-6037011	1.12%	1.16%	19,505 tpy

[2] https://www.ready.noaa.gov/HYSPLIT.php

DAQ requests that you share with us your reasonable progress evaluations for these facilities when they are completed. Such evaluations could include updated 2028 emissions estimates, imposition of federally-enforceable SO_2 limitations such that the facility impacts to West Virginia Class I areas are <1.00%, other analyses or application of guidance indicating that current controls are sufficient for reasonable progress in this round of planning, results of four-factor analyses as described in 40 CFR 51.308(f)(2)(i), or other facility-specific information you deem pertinent to the improvement of visibility impairment at the Dolly Sods Wilderness Area and the Otter Creek Wilderness Area. Please provide this information by December 31, 2020, so that it may be included in West Virginia's consultation draft of the regional haze SIP for the second planning period.

Should your staff have any questions on this request or on West Virginia's regional haze state implementation plan development, please contact Todd Shrewsbury via email at Todd.H.Shrewsbury@wv.gov or via telephone at (304) 414-1908. I look forward to continuing this collaboration both directly and through VISTAS.

Sincerely,

David Fewell
Deputy Director
West Virginia Division of Air Quality

Appendix F-1c

GA letter to KYDAQ dated November 24, 2020

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch
4244 International Parkway
Suite 120
Atlanta, Georgia 30354
404-363-7000

November 24, 2020

Via email to: melissa.duff@ky.gov

Ms. Melissa Duff
Director, Division for Air Quality
Kentucky Department for Environmental Protection
300 Sower Blvd Fl 2
Frankfort, KY 40601-6571

Subject: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Duff,

The purpose of this letter is to request that you share your state's reasonable progress evaluations for sources within Kentucky that significantly contribute to visibility impairment in Class I federal areas (Class I areas) located within the State of Georgia. These Class I areas are the Cohutta Wilderness Area, Okefenokee Wilderness Area, and Wolf Island Wilderness. Georgia has a strong interest in improving air quality and visibility at these Class I areas and across the State.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

> The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

As part of the Visibility Improvement – State and Tribal Association of the Southeast (VISTAS), the regional planning organization for the southeastern United States,[1] my staff within the Georgia Environmental Protection Division (EPD) have been working closely with your staff and expect to continue to do so. This collaborative approach to regional haze state implementation plan (SIP) development has been a highly productive endeavor. VISTAS states have leveraged internal resources throughout this process so that final regional haze plans will provide for significant visibility improvement by the end of this second planning period, 2028.

Below is a summary of the general process EPD followed to determine which sources in Kentucky may be contributing to visibility impairment at Georgia Class I areas in such a manner as to warrant a reasonable progress evaluation.

[1] https://www.metro4-sesarm.org/content/vistas-regional-haze-program

VISTAS initially used an Area of Influence (AoI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AoI analysis used the HYSPLIT Trajectory Model[2] to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to be contributing to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector with the largest impact on visibility impairment were sulfur dioxide (SO_2) and nitrogen oxides (NOx) from point sources.

Next, VISTAS states used the results of the AoI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMx) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 the majority of anthropogenic visibility impairment at Class I areas continues to be from point source SO_2 and NO_x emissions.

Using the PSAT data, VISTAS states identified for reasonable progress analysis the sources shown to have a sulfate or nitrate impact on one or more Class I areas that is greater than or equal to 1.00% of the total sulfate plus nitrate point source visibility impairment on the 20% percent most impaired days for that Class I area. While no facilities in Kentucky have a nitrate impact greater than 1.00%, one facility in Kentucky has a sulfate impact greater than 1.00% on at least one of Georgia's Class I areas. The projected impacts from this facility has been the topic of informal communications between our respective planning staffs. Table 1 lists the Kentucky facility that has a sulfate impact greater than 1.00% and provides SO_2 emission rates used in the PSAT analysis for this facility.

Table 1: Kentucky Facilities with Greater Than 1.00% Sulfate Impact on Georgia Class I Areas.

Facility Name	Facility ID	Contribution to Visibility Impairment, Cohutta	Contribution to Visibility Impairment, Okefenokee	Contribution to Visibility Impairment, Wolf Island	2028 Projected SO_2 Emissions (tpy)
Tennessee Valley Authority (TVA) - Shawnee Fossil Plant	21145-6037011	**1.44%**	**1.03%**	< 1.00%	19,504.75

EPD requests that you share with us your reasonable progress evaluations for this facility when it is completed. Such evaluations could include updated 2028 emissions estimates, imposition of federally-enforceable SO_2 limitations such that the facility impacts to Georgia Class I areas are less than 1.00%, other analyses or application of guidance indicating that current controls are sufficient for reasonable progress in this round of planning, results of four-factor analyses as

[2] https://www.ready.noaa.gov/HYSPLIT.php

described in 40 CFR 51.308(f)(2)(i), or other facility-specific information you deem pertinent to the improvement of visibility impairment at the Cohutta Wilderness Area, Okefenokee Wilderness Area, and Wolf Island Wilderness. Please provide this information by December 31, 2020, so that it may be included in Georgia's consultation draft of the regional haze SIP for the second planning period.

Should your staff have any questions on this request or on Georgia's regional haze state implementation plan development, please contact Dr. James Boylan at (404) 363-7014 or James.Boylan@dnr.ga.gov. I look forward to continuing this collaboration both directly and through VISTAS.

Sincerely,

Karen Hays

Karen Hays, P.E
Chief
Air Protection Branch

cc: Rick Shewekah, Kentucky DEP (rick.shewekah@ky.gov)
James Boylan, Georgia EPD (james.boylan@dnr.ga.gov)
Dika Kuoh, Georgia EPD (dika.kuoh@dnr.ga.gov)

Appendix F-1d

FL letter to KYDAQ dated December 18, 2020

FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 18, 2020

Melissa Duff
Director, Division for Air Quality
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, KY 40601

Re: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Duff:

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) that provides for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states.

Florida has within its borders three Class I areas subject to the reasonable progress requirement. These Class I areas are Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

> The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

To determine which sources in Kentucky may be contributing to visibility impairment at Florida Class I areas, the Florida Department of Environmental Protection (Department) is following the process developed in collaboration with the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) states, described below.

VISTAS initially used an Area of Influence (AOI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AOI analysis used the HYSPLIT Trajectory Model to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to be contributing to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector

with the largest impact on visibility impairment were sulfur dioxide (SO_2) and nitrogen oxides (NO_X) from point sources.

Next, VISTAS states used the results of the AOI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMX) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 the majority of anthropogenic visibility impairment at Class I areas continues to be from point source SO_2 emissions.

Using the PSAT data, VISTAS states selected for reasonable progress analysis the sources shown to have a sulfate impact or nitrate impact in one or more Class I areas that is greater than or equal to 1.00 percent of the total sulfate plus nitrate point source visibility impairment on the 20 percent most impaired days for that Class I area. The following Kentucky facility meets the selection criteria for Florida Class I areas:

Facility Name	**Facility ID**	**Contribution to Visibility Impairment, Chassahowitzka**	**2028 Projected SO_2 Emissions**
Tennessee Valley Authority – Shawnee Fossil Plant	21145-6037011	1.05%	19,504.8

The Department asks that Kentucky include this source in the response to the reasonable progress requirement and share the results of the analysis with Florida. There were no Florida sources selected for the Mammoth Cave National Park in Kentucky.

For the purpose of consultation requirements of the Regional Haze Rule, the Department requests that Kentucky provide a written response. If you have any questions, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

Jeff Koerner, Director
Division of Air Resource Management

Appendix F-1e

NC letter to KYDAQ dated February 1, 2021

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL ABRACZINSKAS
Director

NORTH CAROLINA
Environmental Quality

February 1, 2021

Melissa Duff
Director, Kentucky Division for Air Quality
300 Sower Boulevard
2nd Floor
Frankford, KY 40601

SUBJECT: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Duff:

The purpose of this letter is to request that you share your state's reasonable progress evaluation for a source within Kentucky that contributes to visibility impairment in the Great Smoky Mountains National Park and the Joyce Kilmer-Slickrock Wilderness Area (Class I federal areas) located within North Carolina.[1] North Carolina has a strong interest in improving air quality and visibility at these Class I areas and across the State.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

> The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

As a member of Visibility Improvement – State and Tribal Association of the Southeast (VISTAS), the regional planning organization for the southeastern United States, my staff within the North Carolina Division of Air Quality (NCDAQ) have been working closely with your staff and expect to continue to do so. This collaborative approach to regional haze state implementation plan (SIP) development has been a highly productive endeavor. VISTAS states have leveraged internal resources throughout this process so that final regional haze plans will provide for significant visibility improvement by the end of this second planning period, 2028.

Below is a summary of the general process the NCDAQ followed to determine which sources in Kentucky may be contributing to visibility impairment at North Carolina Class I areas in such a manner as to warrant a reasonable progress evaluation.

[1] Great Smoky Mountain National Park and the Joyce Kilmer-Slickrock Wilderness Area are both located in both Tennessee and North Carolina.

VISTAS initially used an Area of Influence (AoI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AoI analysis used the HYSPLIT Trajectory Model to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to be contributing to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector with the largest impact on visibility impairment were sulfur dioxide (SO_2) and nitrogen oxides (NOx) from stationary point sources.

Next, VISTAS states used the results of the AoI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMx) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 the majority of anthropogenic visibility impairment at Class I areas continues to be from point source SO_2 and NOx emissions.

Using the PSAT data, VISTAS States identified for reasonable progress analysis the sources shown to have a sulfate or nitrate impact on one or more Class I areas that is greater than or equal to 1.00% of the total sulfate plus nitrate point source visibility impairment on the 20% most impaired days for that Class I area. While no facilities in Kentucky have a nitrate impact greater than 1.00%, one facility in Kentucky has a sulfate impact greater than 1.00% on at least one of North Carolina's Class I areas. The projected impact from this facility has been the topic of informal communications between our respective planning staffs. Table 1 lists the Kentucky facility that has a sulfate impact greater than 1.00% and provides the 2028 annual SO_2 emissions used in the PSAT analysis for the facility.

Table 1: Kentucky Facility with Greater Than 1.00% Sulfate Impact on North Carolina Class I Areas

Facility Name	Facility ID	Annual SO_2 Emissions Projected for 2028 (Tons)	Class I Area	PSAT Contribution for Sulfate*
Tennessee Valley Authority - Shawnee Fossil Plant	21145-6037011	19,505	Great Smoky Mountains National Park	1.32%
			Joyce Kilmer-Slickrock Wilderness Area*	1.38%

* Located in both Tennessee and North Carolina.
** Based on initial PSAT modeling completed by VISTAS.

The NCDAQ requests that you share with us your reasonable progress evaluation for this facility when it is completed. Such evaluation could include updated 2028 emissions estimates, imposition of federally-enforceable SO_2 limitations such that the facility impacts to the North Carolina Class I area is less than 1.00%, other analyses or application of guidance indicating that

current controls are sufficient for reasonable progress in this round of planning, results of a four-factor analysis as described in 40 CFR 51.308(f)(2)(i), or other facility-specific information you deem pertinent to the improvement of visibility impairment at the Great Smoky Mountains National Park and Joyce Kilmer-Slickrock Wilderness Area. Please provide this information by March 15, 2021, so that it may be included in North Carolina's consultation draft of the regional haze SIP for the second planning period.

Please submit the requested reasonable progress analysis to the NCDAQ Planning Section Chief, Randy Strait (randy.strait@ncdenr.gov). Should you have any questions regarding this request, please feel free to contact me at (919) 707-8447 or Randy Strait at (919) 707-8721. I look forward to continuing this collaboration both directly and through VISTAS.

Sincerely,

Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

MAA/rps

cc: Leslie Poff, KY Division of Air Quality
Michelle W. Owenby, Director, TN Division of Air Quality
Jimmy Johnston, Deputy Director, TN Division of Air Quality
Tammy Manning, NCDAQ
Randy Strait, NCDAQ