



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

July 24, 2020

Mary S. Walker, Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: North Carolina's Recommendation on Boundaries for the 2010 1-Hour Primary Sulfur Dioxide National Ambient Air Quality Standard for Beaverdam Township – Round 4

Dear Ms. Walker:

Pursuant to the requirements of the federal Clean Air Act (CAA) and on behalf of Governor Roy Cooper, I am submitting the State of North Carolina's recommendation for completing the designation for Beaverdam Township for the 2010 1-hour primary sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). Under the U.S. Environmental Protection Agency's (EPA) Data Requirements Rule, North Carolina elected to conduct source-oriented monitoring for 3 years to evaluate ambient SO₂ concentrations in Beaverdam Township. I am pleased to recommend an "Attainment/Unclassifiable" designation for Beaverdam Township based on the flexibilities EPA has provided in its September 5, 2019, guidance. My recommendation is based on the following:

- Evergreen Packaging/Blue Ridge Paper Products, LLC (BRPP) is the largest stationary source of SO₂ emissions in Beaverdam Township. On October 9, 2017, the North Carolina Environmental Management Commission and Evergreen Packaging/Blue Ridge Paper Products, LLC (BRPP) entered into a Special Order by Consent (SOC 2017-002) to implement process modifications, upgrade existing control equipment, and install new control equipment to reduce SO₂ emissions and keep associated ambient concentrations below the 2010 1-hour SO₂ NAAQS. BRPP has complied with the SOC and, as a result, reduced its annual SO₂ emissions to 405 tons or by 93% (5,470 tons) from 2017 to 2019. These emission reductions have led to corresponding reductions in ambient SO₂ concentrations near the facility. Although the 3-year design value for Calendar Years (CY) 2017 through 2019 for the site is 152 parts per billion (ppb) which is well above the NAAQS, the 99th percentile value for CY 2019 is 34.8 ppb or 46% of the NAAQS. As of July 14, 2020, the ambient monitor for the site continues to record SO₂ concentrations below the CY 2019 99th percentile value. In addition, modeling of maximum allowable emission limitations included in BRPP's Title V permit shows attainment of the NAAQS. For these reasons, ambient SO₂ concentrations are expected to remain below the NAAQS in the future.
- The EPA's September 5, 2019, guidance to states for developing recommendations for designating all remaining areas for the 2010 SO₂ 1-hour NAAQS provides an option to develop a source-specific State Implementation Plan (SIP) for a facility like BRPP to serve as a basis for designating an area

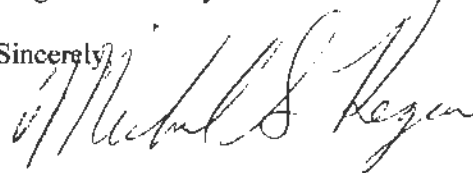


“Attainment/Unclassifiable.”¹ Consistent with this option, North Carolina prepared a source-specific SIP for EPA’s approval to not only strengthen the North Carolina SIP for complying with the 1-hour SO₂ standard in Beaverdam Township, but also to qualify the Beaverdam Township area for an “Attainment/ Unclassifiable” designation. The proposed source-specific SIP requests that EPA incorporate into the North Carolina SIP the SO₂ emission limits and associated monitoring, recordkeeping, and reporting requirements for selected SO₂ emission sources included in the BRPP’s Title V permit. Once EPA approves the proposed source-specific SIP revision, the SO₂ emission limits and associated monitoring, recordkeeping, and reporting requirements included in the SIP will be permanent and federally enforceable under Section 110(a) of the CAA to ensure that future ambient SO₂ concentrations in Beaverdam Township will remain below the NAAQS. North Carolina plans to submit this proposed SIP revision to EPA by early August after the public notice and comment period ends on July 27, 2020.

I thank EPA for offering the flexibilities in its 2019 guidance to develop a source-specific SIP for BRPP to qualify Beaverdam Township for an “Attainment/Unclassifiable” designation for the 2010 1-hour SO₂ NAAQS. I also thank you and all EPA staff involved for working with the North Carolina Division of Air Quality in developing the proposed source-specific SIP. Based on the collective review of air quality measurements, emissions records, and other factors, we believe that the boundary recommendation for Beaverdam Township is based on sound science and verifiable assessment techniques. We recognize the health impacts of SO₂ and believe the recommendations support North Carolina’s and EPA’s goals of cleaner air, healthier lives, a stronger economy, and more effective conservation of our land and water. The information provided herein fully supports EPA’s Round 4 designation action which must be completed by December 31, 2020.

North Carolina is committed to protecting the health of our citizens, our environment, and our economy. Improving and maintaining air quality is critical to the health of our citizens, our future growth, prosperity, and quality of life. We look forward to discussing this boundary recommendation with you.

Sincerely,



Michael S. Regan, Secretary
Department of Environmental Quality

MSR/maa

cc: The Honorable Roy Cooper
Ms. Sheila C. Holman
Mr. Michael A. Abraczinskas
Ms. Leslie Rhodes
Ms. Ashley Featherstone
Mr. Minor Barnette

¹ *Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 4*, Memorandum from Peter Tsigotis, Director, Office of Air Quality Planning and Standards, U.S Environmental Protection Agency, to Regional Air Division Directors, Regions 1 - 10, September 5, 2019.