

ONIS "TREY" GLENN, III
DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2059 ♦ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700
FAX (334) 271-7950

BOB RILEY
GOVERNOR

February 8, 2007

Ms. Lisa P. Jackson
Commissioner
New Jersey Department of Environmental Protection
P. O. Box 402
Trenton, New Jersey 08625-0402

Dear Commissioner Jackson:

We have received your letter of January 18, 2007, concerning visibility impacts on the Brigantine Wilderness Class I area. Thank you for inviting us to interstate discussions on solutions to visibility impairment at that location.

The Alabama Department of Environmental Management (ADEM) agrees with New Jersey's conclusion that Alabama's sources do not contribute significantly to visibility impairment at the Brigantine Wilderness area. Given this, it would not be a wise use of resources for ADEM to send representatives to any future meetings.

I look forward to working with you on other environmental issues. If you have questions please contact Ron Gore of my staff at 334-271-7868.

Sincerely,

A handwritten signature in black ink, appearing to read "Onis 'Trey' Glenn, III".

Onis "Trey" Glenn, III
Director

OTG/SLS/ghe

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (Fax)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (Fax)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (Fax)

Mobile - Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (Fax)



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR & WASTE MANAGEMENT

AIR QUALITY MANAGEMENT
SECTION

156 S. STATE STREET
DOVER, DELAWARE 19901

TELEPHONE: (302) 739 - 9402
FAX No.: (302) 739 - 3106

January 29, 2007

Mr. Chris Salmi
New Jersey Department of Environmental Protection
401 East State Street
P.O. Box 418
Trenton, NJ 08625-0418

Dear Mr. Salmi:

Chris

The Delaware Department of Natural Resources and Environmental Control is in receipt of Commissioner Lisa P. Jackson's letter dated January 18, 2007, requesting a Delaware contact for the Regional Haze consultation process. John Sipple will be Delaware's primary contact. Mr. Sipple can be reached at: DNREC - Air Quality Management, 156 South State Street, Dover, DE 19901 phone: 302-739-9435 email: john.sipple@state.de.us

Mr. Sipple has been working with the mid-Atlantic and northeastern Regional Planning Organizations on a number of particulate matter and regional haze technical committees for several years now. We look forward to continuing this consultation with New Jersey.

Sincerely,

Ali Mirzakhali, P.E.
Administrator

SO#3669

cc: Lisa P. Jackson, NJDEP
Ray Papalski, NJDEP
John A. Hughes, DNREC
James .Werner, Director, DAWM
Ron Amirikian, DNREC
John Sipple, DNREC

Delaware's Good Nature Depends on You!

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RECYCLED PAPER

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, S.E., Suite 1152 East, Atlanta, GA 30334-4100

Noel Holcomb, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
Phone: (404) 656-4713

March 5, 2007

Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
Post Office Box 402
Trenton, New Jersey 08625-0402

Subject: Your Letter of January 18, 2007

Dear Ms. Jackson:

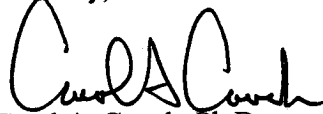
Thank you for your letter to Department of Natural Resources Commissioner Noel Holcomb regarding interstate consultation for improving visibility at the Brigantine Wilderness Class I area. Your letter indicated that the New Jersey Department of Environmental Protection, based on analysis conducted by the MANE-VU Regional Planning Organization, has identified Georgia as a state that may reasonably contribute to visibility impairment at Brigantine.

Georgia EPD is a member of the VISTAS Regional Planning Organization. Based on VISTAS SO2 emissions sensitivity modeling for 2009 and VISTAS SO2 Area of Influence (AOI) work for 2018, we have concluded that Georgia does not reasonably contribute to visibility impairment at Brigantine. The 2009 SO2 emissions sensitivities showed that Georgia EGU and non-EGU sources contributed approximately 0.3% to the total sulfate contribution on the 20% worst days at Brigantine. In addition, the 2018 AOI work indicates that no Georgia sources are significantly impairing visibility at Brigantine. Furthermore, it should be noted that Georgia EPD is currently in the process of requiring 95% SO2 controls to be installed on the seven largest coal fired power plants in Georgia. Not all of these controls were accounted for in the SO2 emission sensitivity modeling or the SO2 AOI work; therefore, Georgia's contributions to Brigantine in these analyses will be a conservative upper bound leading to our conclusion that Georgia EGU and non-EGU SO2 sources do not reasonably contribute to visibility impairment at Brigantine.

Georgia will continue to work with VISTAS, which has been and will continue to participate in discussions with MANE-VU regarding these matters. If you would like to discuss the details of our analyses and our conclusions based on these analyses, please feel free to contact us.

If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014.

Sincerely,



Carol A. Couch, Ph.D.
Director

cc: Heather Abrams
Jimmy Johnston
Jim Boylan
Pat Brewer, VISTAS
John Hornback, VISTAS



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

(217) 782-3397
(217) 782-9143 TDD

March 1, 2007

Ms. Lisa P. Jackson, Commissioner
Department of Environmental Protection
P.O. Box 402
Trenton, New Jersey 08625-0402

Re.: Class I Consultation Process for Regional Haze

Dear Commissioner Jackson:

This letter is in response to your letter to me, dated January 18, 2007, requesting Illinois' participation in a consultation process regarding visibility impairment at the Brigantine Wilderness area in New Jersey. I would like to acknowledge our obligation under the Clean Air Act (CAA) to participate in the process and to assure you of our cooperation in this matter.

It is my understanding that the purpose of the consultation process is to develop shared policy goals toward meeting reasonable progress goals at Brigantine. A necessary part of this process will be review and acceptance of the technical analyses that you have developed that led to your decision to include Illinois in this process. I believe that agreement on the technical basis is the appropriate starting point for discussions on coordinated emission reduction strategies.

Please be aware that Illinois has developed and promulgated regulatory strategies affecting SO₂ and NO_x emissions from electric generating units in our State that exceed the requirements of the federal Clean Air Interstate Rule (CAIR). The expected reductions of emissions from these pollutants will be in place, well before the year 2018, the first milestone year under the Regional Haze Rule. We would be happy to work with you to include these future emission reductions in your technical analyses.

Regular attendance at meetings in New Jersey is problematic for us because of fiscal issues. Mike Koerber of the Midwest Regional Planning Organization (RPO) has agreed to represent us at meetings that we cannot attend. We will participate by conference call if appropriate arrangements can be made. Please contact Rob Kaleel of my staff at (217) 524-4387 with the specifics of any future meetings or conference calls you are planning. We look forward to working with you on this important issue.

Very truly yours,

Douglas P. Scott
Director



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

February 13, 2007

DAVID P. LITTELL
COMMISSIONER

Ms. Lisa Jackson, Commissioner
New Jersey Department of Environmental Protection
PO Box 402
Trenton, NJ 08625-0402

Dear Ms. Jackson:

Thank you for your recent letter regarding regional haze at the Brigantine Wilderness area, and your invitation to participate in New Jersey's regional haze consultation process. Maine, which is home to three Class I Areas: Acadia National Park; Moosehorn Wilderness Area; and Roosevelt Campobello International Park, must also prepare a State Implementation Plan (SIP) for regional haze, and we are looking forward to working with you and other states in the development of a coordinated approach to regional haze planning.

The regional haze consultations being organized by the Mid-Atlantic Northeast Visibility Union (MANE-VU) will provide us the opportunity to craft reasonable progress goals for our respective Class I Areas that are technically sound and regionally consistent. As we move forward with the development of our regional haze SIPs, it is my hope that the MANE-VU members can continue the productive and open dialogue that has characterized our efforts to date, and fully utilize the consultation process to maximize visibility improvements and air quality co-benefits at our Class I Areas and beyond in a cost-effective manner.

As you know, I have agreed to serve as Vice-chair the MANE-VU efforts in the eastern US and I look forward to working with you on it. For staff to staff contact, the Maine Department of Environmental Protection's regional haze planning and consultation efforts are being coordinated by Jim Brooks and Jeff Crawford in the Bureau of Air Quality at (207) 287-2437. Please feel free to contact Mr. Brooks or Mr. Crawford with any questions regarding Maine's regional haze planning process. Thank you again for your invitation and we are looking forward to a productive consultation process.

Sincerely,

David P. Littell
Commissioner

Cc: Ray Papalski, NJDEP
Jim Brooks, MEDEP
Jeff Crawford, MEDEP

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
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PORTLAND, MAINE 04103
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1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
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MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101

Martin O'Malley
Governor

Shari T. Wilson
Acting Secretary

FEB 16 2007

Anthony G. Brown
Lieutenant Governor

Ms. Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625

Dear Commissioner Jackson:

Thank you for your correspondence regarding the Regional Haze State Implementation Plan (SIP) consultation process. I appreciate the opportunity to respond to you regarding this important matter.

As a member, and current chair, of the Mid-Atlantic Northeast Visibility Union (MANE-VU) Technical Advisory Committee, The Maryland Department of the Environment (MDE) is familiar with the obstacles facing States with regard to regional haze. In addition, MDE has been an active participant in the regional planning process of MANE-VU. Although Maryland does not have any Class I areas located within its borders, we acknowledge the importance of regional planning in order to meet the 2064 natural visibility goals established by the Environmental Protection Agency (EPA). Maryland is in agreement that the time has come to start focusing on the required consultation process component of all Regional Haze SIPs. Although in its infancy, this process has begun in the form of a reasonable progress workgroup of which MDE has been a regular participant. MDE anticipates that this workgroup will continue to expand and future consultations will include various Regional Planning Organizations (RPOs) throughout the country, including Mid-West RPO and the Visibility Improvement State and Tribal Association of the Southeast (VISTAS.) MDE asks that you coordinate regional haze planning activities with Mr. Brian Hug, Deputy Program Manager of the Air Quality Planning Program. He can be contacted at the Air and Radiation Management Administration, Suite 730, 1800 Washington Blvd., Baltimore, MD 21230, via voicemail at 410-537-4125, or by email bhug@mde.state.md.us.

Thank you again for your letter. If I may be of further assistance on this or any other matter, please do not hesitate to contact me at 410-537-3084 or Mr. George (Tad) S. Aburn Jr., Director of Air and Radiation Management Administration at 410-537-3255, toll-free 800-633-6101, or via email gaburn@mde.state.md.us.

Very truly yours,

Shari T. Wilson
Acting Secretary

cc: Mr. George (Tad) S. Aburn Jr., Director, Air and Radiation Management Administration
The Maryland Department of the Environment (MDE)





JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

February 6, 2007

Ms. Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, New Jersey 08625-0402

Dear Commissioner Jackson:

Thank you for your letter of January 18, 2007, regarding consultation with Michigan and other states for the New Jersey regional haze program.

Staff of the Michigan Department of Environmental Quality's (MDEQ's) Air Quality Division (AQD) will contact Mr. Ray Papalski of the New Jersey Department of Environmental Protection (NJDEP) and provide the name of the AQD staff person who can participate in the haze consultation process, as you have requested. We will provide assistance in this effort as our resources allow. For your information, Michigan is actively involved in a consultation process with Minnesota, Wisconsin, and other surrounding states to address the State Implementation Plan requirements for the two Class 1 areas in Michigan and the two in Minnesota.

If you have questions, please contact Mr. G. Vinson Hellwig, Chief, AQD, at 517-373-7069, or you may contact me.

Sincerely,

Steven E. Chester
Director
517-373-7917

cc: Mr. Arthur Marin, NESCAUM
Ms. Susan Weirman, MARAMA
Mr. Chris Recchia, OTC
Mr. Raymond Werner, USEPA
Ms. Sandra Silva, USFWS
Mr. Randy Moore, USDA, FS
Ms. Chris Shaver, NPS
Mr. Ray Papalski, NJDEP
Mr. Jim Sygo, Deputy Director, MDEQ
Ms. JoAnn Merrick, Senior Executive Assistant to the Director, MDEQ
Mr. G. Vinson Hellwig, MDEQ
Mr. Robert Irvine, MDEQ



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

April 4, 2007

Lisa Jackson
Commissioner
NJ DEP
P.O. Box 402 , 401 E. State St.
Trenton, NJ 08625-0402

Lisa
Dear Commissioner Jackson:

As you are aware, New Hampshire is home to two Class I areas as designated under Section 169A of the U.S. federal Clean Air Act. The Great Gulf and the Presidential Range – Dry River Class I areas are located on the beautiful slopes of Mt. Washington, the highest point in the Northeastern United States. While this area is renowned for having some of the most challenging weather in the world, it also is known for providing very impressive vistas, that is, when visibility is not impaired by air pollution. Fortunately for those who visit this region and for those who live and work there, the Regional Haze rule requires that these areas and 154 others nationwide gradually improve visibility, with a goal of achieving natural conditions by 2064. While this ultimate goal is decades away, we begin today by taking reasonable actions and by partnering in consultation with states and Canadian provinces, as needed, to begin planning to take the first steps toward meeting this goal. I write today because we have identified your state or province as one that needs to be part of our collective solution to regional haze in New Hampshire.

According to the Clean Air Act, all U.S. states must submit State Implementation Plans (SIPs) by December 2007 for regional haze, regardless of whether they are home to a Class I area. Under the Act's section 169A (including regulations at 40 CFR 51.300), the regional haze SIP must demonstrate that reasonable progress will be made at nearby Class I areas at 10-year intervals, beginning in 2018. The regulations of 40 CFR 51.308(d)(1)(iv) specify that states with Class I areas should develop reasonable progress goals for their Class I areas and associated measures to meet those goals, in consultation with any jurisdiction that may reasonably cause or contribute to visibility impairment in those areas. The Federal Land Managers for the Class I area are also required to be consulted in this process.

While it is believed by the scientific community that every U.S. state contributes in some way to air pollution in The Great Gulf and the Presidential Range – Dry River Class I areas, we have limited our requests for consultations to only those states and Canadian providences that our analyses indicate have the potential for contributions over certain thresholds for PM_{2.5} and/or sulfate to regional haze in our Class I areas. Beyond this, we are asking all states within our own Regional Planning Organization, the Mid-Atlantic Northeast – Visibility Union (MANE-VU) to consult with us. Because we have asked

you to join us in consultation does not necessarily imply that we will be asking for air pollution control beyond measures you may have already identified as necessary for your own state for ozone and PM_{2.5} ambient air standard attainment. By joining us, you can help us shape our regional haze progress goals for 2018 and help play a part in determining the best way to meet those goals for the New Hampshire Class I areas.

We, or a representative from MANE-VU, will be contacting you soon to arrange a consultation meeting. Thank you for your anticipated participation in this consultation and we look forward to working with you and your staff. Should you have any questions, please contact Jeff Underhill of my staff at 603-271-1370 (or email: junderhill@des.state.nh.us).

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Thomas S. Burack". The signature is fluid and cursive, with the first name "Thomas" being the most prominent.

Thomas S. Burack
Commissioner

cc: Robert Scott, NHDES Air Resources Division
Jeffrey Underhill, NHDES Air Resources Division
Anna Garcia, OTC
Arthur Marin, NESCAUM
Susan Weirman, MARAMA

ELIOT SPITZER
GOVERNOR



STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
ALBANY, NEW YORK 12233-1010

FEB 20 2007

Honorable Lisa P. Jackson
Commissioner
New Jersey Department of
Environmental Protection
P.O. Box 402
Trenton, New Jersey 08625-0402

Dear Commissioner Jackson:

This is in response to your letter seeking New York's consultation on the development of a reasonable progress goal and coordinated emissions management strategy as a part of the effort to prepare a State Implementation Plan (SIP) for Regional Haze by December 2007. The submission of this SIP to the United States Environmental Protection Agency is required under Section 169(a) of the Act, and requires that reasonable progress is made toward improved visibility in nearby Class I areas by certain milestone years.

While there are no Class I areas in New York, the New York State Department of Environmental Conservation (Department) recognizes the importance of this effort in ensuring the protection of visibility of these areas in states that might be impacted by New York sources that are determined to cause or contribute to visibility impairment, as well as sources in other states. The Department looks forward to working with New Jersey Department of Environmental Protection (NJDEP), agencies in other states, the Mid-Atlantic Northeast - Visibility Union (MANE-VU) and other Regional Planning Organizations (RPOs) in advancing this work.

Planning and discussions among the affected parties are integral to this effort. The contact for the Department is Mr. Robert Sliwinski, PE, Director, Bureau of Air Quality Planning, Division of Air Resources, 625 Broadway, Albany, New York 12233-3251. Mr. Sliwinski and his staff are responsible for preparing the haze SIP for New York. You may reach Mr. Sliwinski at (518) 402-8396.

Please let me know in the future if there are any other measures you feel would be appropriate in advancing the goal of improved visibility in the Northeast.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl Johnson", with a long horizontal line extending to the right.

Carl Johnson
Acting Executive Deputy Commissioner

c: Mr. Robert Sliwinski, NYSDEC
Mr. Ray Papalski, NJDEP
Mr. Arthur Marin, NESCAUM
Ms. Susan Weirmen, MARAMA
Mr. Chris Reccia, OTC
Mr. Raymond Werner, USEPA
Ms. Sandra Silva, USFWS
Mr. Randy Moore, USDA, FS
Ms. Chris Shaver, NPS



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Michael F. Easley, Governor

William G. Ross, Jr., Secretary
B. Keith Overcash, P.E., Director

March 2, 2007

Ms. Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625-0402

Dear Ms. Jackson:

This letter is in response to your letter of January 18, 2007 to Secretary William Ross, Jr., Secretary of the North Carolina Department of Environment and Natural Resources regarding the consultation process under the Regional Haze rule. I am responding to your letter at Secretary Ross's request.

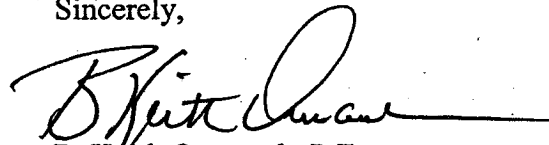
As you may know, North Carolina is home to five different Class I areas, as designated under Section 169A of the Clean Air Act, including the Great Smoky Mountains National Park, which is recognized as being one of the more polluted parks in the United States. The State has a major interest in improving air quality and visibility at these Class I areas and all across North Carolina. That interest is best demonstrated by the adoption of the Clean Smokestacks Act by the General Assembly of North Carolina during the 2002 session. This landmark legislation establishes caps on the nitrogen oxide and sulfur dioxide emissions from the coal-fired power plants in the State. These caps can only be met with actual reductions in North Carolina; that is, no credits can be used to satisfy the cap and any allowances earned by these reductions cannot be sold to facilities outside of North Carolina. I have attached the compliance plans provided by each of our two utilities showing which units are expected to install control equipment in order to meet these caps. I believe the expected controls under this legislation will address a significant portion of North Carolina's contribution to not only our Class I areas, but those downwind of our State.

The North Carolina Division of Air Quality (NCDAQ) has been active in the Visibility Improvement – State and Tribal Association of the Southeast (VISTAS), the regional planning organization for the Southeastern United States. We have also reviewed the report entitled, "Contributions to Regional Haze in the Northeast and Mid Atlantic United States", prepared by NESCAUM for the Mid-Atlantic/Northeast Visibility Union (MANE-VU). One observation of this report is that the contribution assessment was performed based on 2002 emissions. NCDAQ believes it is prudent to also repeat the exercise for 2018 after implementation of programs such as the North Carolina Clean Smokestacks Act and the Clean Air Interstate Rule. VISTAS has in fact performed such assessments, and while geographic areas of North Carolina fall within the Brigantine Wilderness area's defined area of influence for sulfate derived visibility impacts, no sources in North Carolina appear on the significant contribution list based upon the 2018 results.

NCDAQ would be willing to participate with VISTAS as these results are shared and explained to New Jersey and other States in MANE-VU. However, I do not see at this time a need for significant consultation on the regional haze plans between North Carolina and New Jersey due to the projected limited impact of our sources on the visibility impairment at Brigantine in 2018. I believe a better use of NCDAQ's limited resources for consultation should be focused on our neighboring States where there is more impact from our sources on their Class I areas, and from their sources on North Carolina's Class I areas.

Should your staff have any questions on this letter or on the technical aspects of the VISTAS work or North Carolina's regional haze state implementation plan development, please contact Sheila Holman of my staff at (919) 715-0971. I look forward to sharing the VISTAS contribution assessment work with you.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Keith Overcash", written over a horizontal line.

B. Keith Overcash, P.E.
Director

Enclosures

Cc: Secretary William Ross, Jr.
John Hornback, SESARM/Metro4 Director

NO _x							
			2007 Compliance		2009 Compliance		
Facility	Unit	Technology	Operational Date	Expected Rate #/MMBTUs	Tons	Expected Rate #/MMBTUs	Tons
Allen	1	SNCR	2003	0.160	901	0.160	851
Allen	2	SNCR	2007	0.180	799	0.160	798
Allen	3	SNCR	2005	0.160	1,409	0.160	1,297
Allen	4	SNCR	2006	0.160	1,537	0.160	1,451
Allen	5	SNCR	2008	0.220	2,078	0.160	1,377
Belows Creek	1	SCR	2003	0.065	1,942	0.060	2,425
Belows Creek	2	SCR&Burners	2004	0.060	2,260	0.060	1,871
Buck	3	Burners	2007	0.280	489	0.220	308
Buck	4	Burners	2007	0.280	295	0.220	196
Buck	5	SNCR	2006	0.150	582	0.150	605
Buck	6	SNCR	2006	0.150	581	0.150	604
Cliffside	1	Tuning Only	2004	0.360	302	0.360	255
Cliffside	2	Tuning Only	2004	0.360	300	0.360	262
Cliffside	3	Tuning Only	2004	0.400	587	0.400	544
Cliffside	4	Tuning Only	2004	0.400	593	0.400	538
Cliffside	5	SCR	2002	0.060	1,099	0.060	1,141
Dan River	1	Burners	2008	0.370	614	0.220	345
Dan River	2	Burners	2006	0.220	388	0.220	369
Dan River	3	Burners	2006	0.220	828	0.220	825
Marshall	1	SNCR	2006	0.170	2,212	0.170	2,256
Marshall	2	SNCR	2007	0.190	2,008	0.170	2,241
Marshall	3	SNCR	2005	0.190	4,322	0.180	4,328
Marshall	4	SNCR	2007	0.190	4,305	0.180	4,078
Riverbend	4	SNCR	2007	0.200	466	0.170	400
Riverbend	5	SNCR&Burners	2008	0.240	516	0.170	401
Riverbend	6	SNCR&Burners	2006	0.150	570	0.150	565
Riverbend	7	SNCR	2006	0.150	549	0.150	578
Expected Total:					32,533	30,909	
Compliance Limit:					35,000	31,000	

*** NOTE 1 ***

*** NOTE 1 *** Because the expected 2009 NO_x emissions are so close to the 31,000 ton limit, Duke will continue to evaluate options to improve performance, including SCR on Marshall Unit 3 and/or SNCR on Dan River Unit 3.

Technology:

Burners – Overfired Air or Separated Overfired Air with associated Mill Classifier installations
SCR – Selective Catalytic Reduction
SNCR – Selective Non-Catalytic Reduction

Changes from 4/1/2005 Plan Highlighted

NO _x									
				2007 Compliance			2009 Compliance		
Facility	Unit	Technology	Operational Date	Expected Rate #/MMBTUs	Tons	Expected Rate #/MMBTUs	Tons		
Allen	1	SNCR	2003	0.160	901	0.160	851		
Allen	2	SNCR	2007	0.180	799	0.160	798		
Allen	3	SNCR	2005	0.160	1,409	0.160	1,297		
Allen	4	SNCR	2006	0.160	1,537	0.160	1,451		
Allen	5	SNCR	2008	0.220	2,078	0.160	1,377		
Belews Creek	1	SCR	2003	0.065	1,942	0.060	2,425		
Belews Creek	2	SCR&Burners	2004	0.060	2,260	0.060	1,871		
Buck	3	Burners	2007	0.280	489	0.220	308		
Buck	4	Burners	2007	0.280	295	0.220	196		
Buck	5	SNCR	2006	0.150	582	0.150	605		
Buck	6	SNCR	2008	0.150	581	0.150	604		
Cliffside	1	Tuning Only	2004	0.360	302	0.360	255		
Cliffside	2	Tuning Only	2004	0.400	587	0.400	544		
Cliffside	3	Tuning Only	2004	0.400	593	0.400	538		
Cliffside	4	Tuning Only	2004	0.400	593	0.400	538		
Cliffside	5	SCR	2002	0.060	1,099	0.060	1,141		
Dan River	1	Burners	2008	0.370	614	0.220	345		
Dan River	2	Burners	2006	0.220	388	0.220	369		
Dan River	3	Burners	2006	0.220	828	0.220	825		
Marshall	1	SNCR	2006	0.170	2,212	0.170	2,256		
Marshall	2	SNCR	2007	0.190	2,008	0.170	2,241		
Marshall	3	SNCR	2005	0.190	4,322	0.180	4,328		
Marshall	4	SNCR	2007	0.190	4,305	0.180	4,078		
Riverbend	4	SNCR	2007	0.200	466	0.170	400		
Riverbend	5	SNCR&Burners	2008	0.240	516	0.170	401		
Riverbend	6	SNCR&Burners	2006	0.150	570	0.150	565		
Riverbend	7	SNCR	2006	0.150	549	0.150	578		
Expected Total:				32,533		30,909			
Compliance Limit:				35,000		31,000			

*** NOTE 1 *** Because the expected 2009 NO_x emissions are so close to the 31,000 ton limit, data will be reported to the nearest 100 tons.

NOTE 1 *** Because the expected 2009 NO_x emissions are so close to the 31,000 ton limit, Duke will continue to evaluate options to improve performance, including SCR on Marshall Unit 3 and/or SNCR on Dan River Unit 3.

Technology:
Burners - Overfired Air or Separated Overfired Air with associated Mill Classifier installations
SCR - Selective Catalytic Reduction
SNCR - Selective Non-Catalytic Reduction
Changes from 4/1/2005 Plan Highlighted

Unit	MW Rating	Control Technology	Operation Date ¹	Projected NOx Tons, 2007 ²
Asheville 1	198	LNB/AEFLGR/SCR	2009	2,625
Asheville 2	194	LNB/OFA/SCR		432
Cape Fear 5	143	ROFA/ROTAMIX		580
Cape Fear 6	173	ROFA/ROTAMIX		770
Lee 1	79	WIR		928
Lee 2	76	LNB	2006	493
Lee 3	252	LNB/OFA/ROTAMIX	2010	1,689
Mayo 1	745	LNB/OFA/SCR		1,741
Roxboro 1	385	LNB/OFA/SCR		1,084
Roxboro 2	670	TFS2000/SCR		1,292
Roxboro 3	707	LNB/OFA/SCR		2,036
Roxboro 4	700	LNB/OFA/SCR		1,938
Sutton 1	97	SAS		1,008
Sutton 2	106	LNB	2006	1,116
Sutton 3	410	LNB/ROFA/ROTAMIX		3,716
Wspn 1	49			879
Wspn 2	49			915
Wspn 3	78	WIR		1,028
Total	5,111			24,271

AEFLGR - Amine-Enhanced Flue Lean Gas Reburn

LNB - Low NOx Burner

SNCR - Selective Non-Catalytic Reduction

OFA - Overfire Air

ROFA - Rotating Opposed-fired Air

ROTAMIX - Injection of Ammonia to further reduce NOx (used in combination with ROFA)

WIR - Underfire Air

TFS2000 - Combination Low-NOx Burner/Overfire Air

SAS - Separated Air Staging

¹ Note: This is the operation date for the control technology installed to comply with the North Carolina Improve Air Quality/Electric Utilities Act only (shown in bold).
² Unit by unit emissions are illustrative only and specific emissions limits should not be inferred. Actual emissions in 2007 may be different from unit to unit

Attachment 3: PEC SO₂ Control Plan for North Carolina Coal-Fired Units

Unit	MW Rating	Technology	Operation Date	Projected SO ₂ Tons, 2009 ¹	Projected SO ₂ Tons, 2013 ¹
Asheville 1	198	Scrubber	2005	864	818
Asheville 2	194	Scrubber	2006	886	960
Cape Fear 5	143	Scrubber	2012	6,249	656
Cape Fear 6	173	Scrubber	2011	7,725	787
Lee 1	79			2,940	2,660
Lee 2	76			2,637	2,756
Lee 3	252			10,078	7,493
Mayo 1	745	Scrubber	2009	14,361	3,203
Roxboro 1	385	Scrubber	2008	1,741	1,700
Roxboro 2	670	Scrubber	2007	2,853	2,577
Roxboro 3	707	Scrubber	2008	2,928	3,005
Roxboro 4	700	Scrubber	2007	2,363	2,902
Sutton 1	97			4,402	3,217
Sutton 2	106			4,052	2,768
Sutton 3	410	Scrubber	2012	16,269	1,823
Wspn 1	49			1,458	1,208
Wspn 2	49			1,587	1,286
Wspn 3	78			3,301	3,480
Total	5,111			86,692	44,485

¹ Unit by unit emissions are illustrative only and specific emissions limits should not be inferred. Actual emissions in 2009 and 2013 may be different from unit to unit.
² Projections are based on 97% SO₂ removal efficiency, forecasted energy demand, 3.3 lbs SO₂/Mbtu coal on scrubbed units, and 1.2 lbs SO₂/Mbtu coal on others



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020, FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

FEB 15 2007

Ms. Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
P.O. Box, 402
Trenton, NJ 08652-0402

Re: Interagency discussions on Class I areas

Dear Ms. Jackson:

I am writing in response to your letter of January 18, 2007 seeking Ohio's involvement in the interagency consultations for evaluating reasonable further progress for Class I areas in your state. Specifically, you would like to discuss coordinated emission reduction strategies for the first reasonable progress goal of 2018.

Ohio EPA is an active participant in the Midwest Regional Planning Organization (MRPO) which is the designated organization providing technical assistance to Ohio, Indiana, Illinois, Michigan and Wisconsin in our efforts to meet regional haze requirements. At the state level, we have initiated discussions with West Virginia, our closest neighboring state containing a Class I area. We have been aware that interagency consultations with the MRPO, MANE-VU and VISTAS organizations would be necessary and Ohio EPA does wish to participate.

Bill Spires is Ohio's representative to the MRPO project management team and is the manager of our SIP development Section. He will be developing the Regional Haze and BART plans to meet the December submittal date and will be the point of contact for Ohio in these consultations. If you have any questions, please have your staff contact Bill at:

Ph: 614-644-3618

email: bill.spires@epa.state.oh.us

Sincerely

Chris Korleski
Director

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 2063

Harrisburg, PA 17105-2063

February 22, 2007

Secretary

717-787-2814

Mr. Ray Papalski
401 East State Street
P.O. Box 418
Trenton, NJ 08625-0418

Dear Mr. Papalski:

Thank you for your recent letter regarding the Regional Haze Program and New Jersey's process for consultations with states prior to the development of reasonable progress goals for improved visibility in the mandatory Federal Class I area, Brigantine Wilderness Area of the Edwin B. Forsythe National Wildlife Refuge. Your letter also indicates that you are seeking "...consultation on the reasonable progress goal and development of a coordinated emissions management strategy."

The Pennsylvania Department of Environmental Protection looks forward to participating in consultations with New Jersey and states with Class I areas that could be impacted by emissions from certain sources in Pennsylvania. As you know, Pennsylvania has actively participated in the Mid-Atlantic/Northeast Visibility Union (MANE-VU) since its inception in 2001 and will continue to work closely with MANE-VU member states, including New Jersey, to address regional haze. This cooperative effort should promote regional consistency that is critical to the development of viable reasonable progress goals and a cohesive strategy to improve visibility at the Brigantine Wilderness Area and other Class I areas in the MANE-VU consultation group. During the consultation process, we will continue to consult with Class I area states, as appropriate, to address the key components of the Regional Haze Program in a manner that ensures that our revision to the State Implementation Plan optimizes visibility improvement in affected Class I areas and provides reasonable progress toward the goal of achieving natural visibility conditions at Class I areas by 2064.

Your letter also requested that we send a representative to future consultation meetings. To this end, ~~J. Wick Havens~~, Chief of the Air Resource Management Division in the Bureau of Air Quality, will continue to serve as the representative during the regional haze consultation process. ~~Mr. Havens~~ can be reached by e-mail at jhavens@state.pa.us or by telephone at 717-787-9496. ~~Nancy Herb~~ will serve as the alternate representative, when necessary. Ms. Herb can be reached by e-mail at nherb@state.pa.us or by telephone at 717-783-9269. Any information related to the consultation process that is provided by mail should be sent to:



J. Wick Havens
Chief, Air Resource Management Division
Bureau of Air Quality
Department of Environmental Protection
400 Market Street
PO Box 8468
Harrisburg, PA 17105-8468

Thanks again for outlining your expectations during the Regional Haze consultation process. We look forward to continuing to work with you toward our common goal of an effective regional haze program that optimizes visibility improvement in the Brigantine Wilderness Area and other affected Class I areas.

Sincerely,


Kathleen A. McGinty
Secretary

BOARD:
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Secretary



C. Earl Hunter, Commissioner

Promoting and protecting the health of the public and the environment.

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March 15, 2007

Lisa P. Jackson, Commissioner
State of New Jersey Department of Environmental Protection
Post Office Box 402
Trenton, New Jersey 08625-0402

Re: Regional Haze State Implementation Plans

Dear Ms. Jackson:

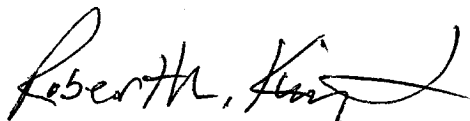
This letter is in response to your January 18, 2007, letter regarding effects that other state emissions may have on the Class I area in New Jersey known as the Brigantine Wilderness area (Brigantine). As you may be aware, South Carolina is a member of the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) Regional Planning Organization (RPO) and is committed to improving visibility as required by Section 169A of the Clean Air Act. The Department is currently preparing a State Implementation Plan (SIP) to address visibility and regional haze issues for our own Class I area, the Cape Romain Wilderness area (Cape Romain).

In your letter, you indicate that you are seeking consultation with South Carolina regarding the reasonable progress goal for your Regional Haze SIP. VISTAS has conducted assessments for the VISTAS states to help predict the influence of emissions from the VISTAS region on visibility at Class I areas in and near the VISTAS region. This work took into account the latest data and information available, including the reductions from Clean Air Act and state programs that will be in effect in 2018. These assessments do not indicate that South Carolina facility emissions have an impact on visibility at any Class I area outside of the VISTAS region. Therefore, we conclude that emissions from South Carolina do not reasonably contribute to visibility impairment at the Brigantine Class I area.

The Department is committed to improving air quality and appreciates this opportunity for consultation with you and the invitation to attend future meetings of your Mid-Atlantic Northeast-Visibility Union (MANE-VU) RPO. However, we feel that it will be sufficient for our VISTAS representatives to participate in the MANE-VU meetings and to keep us informed of important developments from those meetings.

Should you have any questions concerning South Carolina's regional haze SIP development, please contact Stacey Gardner of my staff at (803) 898-4287 or gardnesr@dhec.sc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. King, Jr.", with a stylized flourish at the end.

Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

cc: Myra Reece, Chief, Bureau of Air Quality, SCDHEC
Robert Brown, Director, Division of Air Planning, Development and Outreach,
SCDHEC
Pat Brewer, VISTAS Technical Advisor



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

February 20, 2007

Ms. Lisa P. Jackson
Commissioner, New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08624-0402

Dear Ms. Jackson:

Thank you for the invitation to consult with New Jersey on the required reasonable progress goal and development of a coordinated emissions strategy. Like New Jersey, Virginia has areas that are designated as Class I under §169A of the Clean Air Act: Shenandoah National Park (SNP) and the James River Face (JRF). Therefore, Virginia is also quite interested in and concerned with the issue of improving visibility in these parks and forests, and would appreciate being included in notice of meetings or conference calls.

Information currently available to our staff indicates that both SNP and the JRF will see large reductions in visibility impairment by the year 2018, reductions, in fact, that are significantly greater than those needed for meeting a linear glide path to natural conditions in 2064. Because federal policy and guidance on the issues of reasonable progress and reasonable progress goals are both ambiguous and incomplete, communications between staff and regional planning organizations are even more important. Every effort needs to be made to ensure a process that is both flexible and adequate for meeting visibility improvements.

The following staff members are the appropriate contacts for your regional consultation process.

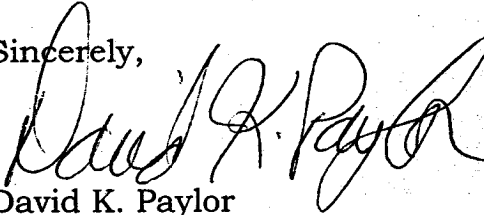
Staff Member	Email Address	Phone Number	Area of Emphasis
Jaime Bauer	jlbauer@deq.virginia.gov	804-698-4030	BART, BART Permits
Doris McLeod	damcleod@deq.virginia.gov	804-698-4197	Inventories, SIP development
Mike Kiss	mfkiss@deq.virginia.gov	804-698-4460	BART, BART Exemptions, Modeling

The fax number for the above staff members is 804-698-4510, and their mailing address is:

Virginia Department of Environmental Quality
Division of Air Quality – 8th Floor
P.O. Box 1105
Richmond, VA 23218

Your staff may call any of those listed above or Jim Sydnor, Division of Air Quality Director, at 804-698-4424 if there are further questions regarding Virginia's air quality plans to address regional haze requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "David K. Paylor", written over the printed name.

David K. Paylor

DKP:dlm

C: Ray Papalski
NJ DEP

Jim Sydnor, Director, DEQ Air Division



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475 Fax: (304) 926-0479

Joe Manchin III, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

March 20, 2007

Lisa P. Jackson, Commissioner
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625-0402

Re: Regional Haze Consultation

Dear Ms. Jackson,

On behalf of Secretary Timmermeyer, thank you for the invitation to participate in a consultation process for regional haze regarding the Brigantine Wilderness area in New Jersey (your letter dated January 18, 2007). We also appreciate the brief summary of analysis results which New Jersey has conducted, in conjunction with MANE-VU, concerning the protection of visibility in Class I areas. We would have responded much sooner but apparently your letter was addressed to a location from which we moved over two years ago. Even though we had been expecting your letter, it took considerable time to obtain a signed copy. You may want to ensure that your records are updated to reflect our current address shown in the letterhead.

For some time, West Virginia has been working with the Regional Planning Organization (RPO) VISTAS, to develop the technical basis for our Regional Haze SIP. Our State has two of the 156 areas designated as Class I areas under Section 169A of the Clean Air Act, namely the Dolly Sods and Otter Creek Wilderness Areas. Therefore, West Virginia is likewise keenly interested in the issue of improving visibility for these areas, and others on which we may have substantive impact.

Technical information currently available to us indicates that both Dolly Sods and Otter Creek will significantly exceed the level of improvement needed to achieve the uniform rate of progress (URP) under existing federal programs alone (CAIR, Tier II, etc.). It also appears that all other nearby Class I areas (e.g. Shenandoah, James River Face, Shining Rock) on which West Virginia may have a substantial impact will also significantly exceed the level of improvement needed to achieve the URP under existing federal programs alone. Therefore, it seems likely that when anticipated reductions are properly taken into account, emissions from West Virginia will not interfere with reasonable progress in New Jersey.

Nevertheless, federal policy and guidance on the issues of reasonable progress and reasonable progress goals have been ambiguous and incomplete. Accordingly, West Virginia

Lisa P. Jackson, Commissioner
March 16, 2007
Page 2

recognizes the need for consultation to the discuss reasonable progress goals and to develop a coordinated emissions management strategy where necessary.

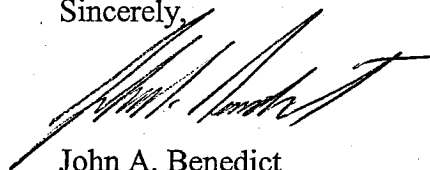
We look forward to working with you and your staff in the near future to develop a recommendation for the most cost-effective strategy, agreeable to all jurisdictions involved, for implementation of long-term measures and controls which demonstrate that reasonable progress goals for the Class I areas will be achieved.

The following staff members are the appropriate contacts for the regional consultation process.

Staff Member	Email Address	Phone Number	Area of Emphasis
Bob Betterton	rbetterton@wvdep.org	304-926-0499 x 1241	Inventories
Laura Crowder	lcrowder@wvdep.org	304-926-0499 x 1247	BART, SIP development

The fax number for the above staff members is 304-926-0478, and their mailing address is shown in the letterhead. Your staff may call either of those listed above or Fred Durham, Assistant Director of Planning at 304-926-0499, extension 1242 if there are further questions regarding West Virginia's air quality plans to address regional haze requirements.

Sincerely,



John A. Benedict
Director, Division of Air Quality

cc: Ray Papalski, NJ Division of Air Quality