May 2, 2018

CONTACT

COMPANY

ADRESS

Re: Regional Haze

Second Planning Period

Dear X:

The Department of Health (Department) has begun work on the second planning period (Round 2) State Implementation Plan (SIP) for regional haze. In Round 1 of the regional planning process, the emphasis was on Best Available Retrofit Technology (BART) and making reasonable progress towards the national visibility goal. In Round 2, there are no BART requirements; therefore, we will focus on making reasonable progress. The reasonable progress analysis will be made using the four factors in Section 169A(g)(1) of the Clean Air Act:

The four factors are:

1. The cost of compliance
2. The time necessary to achieve compliance
3. The energy and non-air quality environmental impact of compliance; and
4. The remaining useful life of any existing source subject to such requirements

Guidance provided by the U.S. Environmental Protection Agency (Draft Guidance on Progress Tracking Metrics, Long Term Strategies, Reasonable Progress Goals and Other Requirements for Regional Haze State Implementation Plans for the Second Implementation Period at [https://www.epa.gov/sites/production/files/2016-07/documents/draft\_regional\_haze\_guidance\_  
july\_2016.pdf](https://www.epa.gov/sites/production/files/2016-07/documents/draft_regional_haze_guidance_july_2016.pdf)) indicates the Department must address 80% of the visibility impairment caused by in-state sources. Data from the IMPROVE monitoring sites at Theodore Roosevelt National Park (TRNP) and Lostwood Wilderness Area (LWA) indicate that sulfates and nitrates continue to be the largest contributors to visibility impairment in these areas. The primary precursors of sulfates and nitrates are emissions of sulfur dioxide (SO2) and nitrogen oxides (NOX).

Coal-fired electrical generating units have been identified as one of the largest source of sulfur dioxide and nitrogen oxides in North Dakota. Therefore, the Department requests that you prepare a “four factors” analysis for your coal-fired electrical generating units. The analysis should be prepared using the draft EPA guidance noted above. The Department will identify other sources in North Dakota that will be required to submit a four factors analysis.

The Department will be working with the Western Regional Air Partnership (WRAP) to prepare the Round 2 SIP. WRAP will be conducting air quality modeling of regional emissions reductions in early 2019. The Department asks that your “four factors” analysis be submitted by January 31, 2019.

If you have any questions, please contact David Stroh of my staff at (701)328-5188.

Sincerely,

Terry L. O’Clair

Director

Division of Air Quality