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United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Supervisor's Office

160 ZILICOA ST STE A
ASHEVILLE NC 28801-1082
828-257-4200

File Code: 2580-3

Date: May 6, 2009

Mr. Eric Cornwell
Acting Permit Program Manager
Georgia Department of Natural Resources
Environmental Protection Division, Air Protection
Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354

RECEIVED

MAY 11 2009

AIR PROTECTION BRANCH

Dear Mr. Cornwell:

I am writing to consult with you regarding our review of the "Plant Washington Prevention of Significant Deterioration (PSD) Application." The facility is located in Washington County, Georgia. Shining Rock Wilderness is the closest federally mandated Class I area (about 232 kilometers (km)) and is administered by the USDA Forest Service. I will be the only representative of the USDA Forest Service to provide comments because the atmospheric modeling results predicted the greatest impacts at Shining Rock Wilderness. Cohutta and Joyce Kilmer - Slickrock Wilderness are the other two federally mandated Class I area administered by the USDA Forest Service that were evaluated for potential impacts to the Air Quality Related Values (AQRV), and they are located 261 and 276 km, respectively, from the facility.

The applicant is proposing to construct and operate an 850 MW coal-fired power plant. The facility is designed to include one supercritical pulverized coal-fired boiler. The proposed emission increases of nitrogen oxides, sulfur dioxides, particulate matter, and sulfuric acid mist are 1836, 1896, 678, and 145 tons per year, respectively.

An AQRV analysis was accomplished to evaluate the potential impacts to visibility and nitrogen and sulfur deposition at Shining Rock Wilderness. The visibility analysis conducted following the current guidance (Method 2 uses hourly relative humidity values) estimated there would be no days the emission increases would cause visibility impairment. The second visibility analysis (Method 6, using the new IMPROVE equation and monthly average relative humidity values) also found there would be no days the proposed emission increase would contribute to visibility impairment.

The applicant evaluated if there is likely to be an increase of nitrogen or sulfur. The maximum increase in nitrogen deposition is predicted to increase 0.004 kilograms per hectare per year (kg/ha/yr) and the sulfur deposition maximum increase is 0.009 kg/ha/yr. Both of these values are below the significance values of 0.1 kg/ha/yr.



Mr. Cornwell

page 2

If the draft permit issued by your agency has the same or lower emission rates used in the Class I modeling analysis then I am advising your agency that the changes in air quality from the proposed emission increases at the Plant Washington facility will not cause or contribute to an adverse impact to any AQRV, especially visibility. We will provide our final comments to your agency once we have reviewed the draft permit issued by your agency.

Please contact Bill Jackson (828-257-4815) or Melanie Pitrolo (828-257-4213) if you have any questions regarding our review.

Sincerely,

Mary A. Noel
for MARISUE HILLIARD
Forest Supervisor

cc: Richard Gillam, Bill Jackson, George M Bain