

# Memo

To: Air Quality Board  
From: Ashley Featherstone  
CC: David Brigman  
Date: November 16, 2015 and Revised March 22, 2016  
Re: Public Comments Regarding Proposed Title V Permit Renewal for Duke Energy Progress, Inc. – Asheville Steam Plant Facility

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## **Introduction**

The WNC Regional Air Quality Agency (WNCRAQA) Board appointed Chairman Britt Lovin to serve as the hearing officer for a public hearing regarding the renewal of the air quality permit for the Duke Energy Progress, Inc. - Asheville Steam Electric Plant in Arden. Duke Energy Progress (DEP) has applied for the air permit renewal for its coal-fired boilers, combustion turbines, and associated pollution control equipment at the Asheville Steam Plant, 200 CP&L Drive, in Buncombe County. DEP (formerly Progress Energy Carolinas and Carolina Power & Light) has operated a power plant at this site since the 1960s. The primary purpose of the Title V permit is to consolidate and identify existing Local and Federal air quality requirements applicable to the Asheville Steam Electric Plant, and to provide practical methods for determining compliance with these requirements. The permit has been prepared in accordance with the WNCRAQA Air Quality Code, Chapter 17, Section .0500 – “Title V Procedures” and Title V of the Federal Clean Air Act. This permit will be enforceable by the WNCRAQA, the U.S. Environmental Protection Agency (EPA), and citizens as defined under the Federal Clean Air Act. While the rules do not require a public hearing for the renewal of a Title V permit, a hearing was requested by the Sierra Club and the Director decided that a hearing was appropriate. The public notice for the public comment period and the hearing was issued in the March 26th edition of the Asheville Tribune and the Weaverville Tribune newspapers and was advertised on the Agency’s website. Written comments from the public were accepted via email and regular mail from March 26<sup>th</sup> until May 7, 2015. Written and oral comments were also received at the public hearing held on the evening of Wednesday, April 29, 2015, at the Clyde A. Erwin High School auditorium in Asheville.

## **Summary of the Hearing and Public Comments**

The hearing was opened at 6 pm. After the opening remarks by the Hearing Officer, Permitting Program Manager, Ashley Featherstone, and Air Quality Supervisor, Betsy Brown, of the WNCRAQA staff made brief presentations regarding the sulfur dioxide standard and the proposed Title V permit renewal. Ms. Featherstone and Ms. Brown described the air quality management process pertaining to the 2010 sulfur dioxide standard, the Title V permitting process, and provided some general information about the proposed permit. Mr. Lovin then opened the hearing to public comment. Of the approximately 150 to 200 attendees, 104 signed in and 54 spoke. All spoke in opposition to issuing the permit as drafted. Each speaker was given three minutes to speak. Speaking time was reduced to two minutes per speaker during the last hour of the hearing, in order to accommodate all that signed up. The hearing lasted approximately two hours and forty minutes.

The WNCRAQA received a total of 691 written comments during the comment period by email, letter, or hand submitted on the night of the public hearing. The total number of comments received and reviewed (written and oral) was 745. Of the 691 written comments, 52 were letters that were submitted by mail, 32 were written comments submitted at the hearing, 157 were letters from students submitted by a teacher at Erwin High School, as part of a class assignment, and 450 were submitted by email. Of the 450 comments submitted by email, there were five “form emails” that accounted for 332 of the comments. All but two of the written comments were in opposition to the permit. The two comments that were not in opposition to the draft permit were not in favor of it either. Some of the comments were double counted as some commenters spoke at the hearing and also submitted written comments by email and in person at the hearing.

## **Discussion of Comments**

All comments received during the public comment period, both oral and written, have been evaluated by WNCRAQA staff. Copies of all written comments are provided in the appendices to this report. It is neither practical nor efficient to address every individual comment in this report. Instead, an extensive review of the oral and written comments was conducted and through this process, comments were categorized and summarized where possible.

Comments submitted electronically in a letter dated April 30, 2015 to Betsy Brown, Air Quality Supervisor, from Bridget Lee, Staff Attorney with the Sierra Club, addressed the main issues that were mentioned by the majority of the commenters, with the most detail related to the air permit. Other groups that submitted comments included Mountain True, Medical Advocates for Healthy Air, Physicians for Social Responsibility, and the Asheville City Council. After consideration and discussion of the Sierra Club comments, this document will address a few other comments that were provided during the public comment period. Some of the additional comments were very similar to the Sierra Club comments, but stated differently with additional details, and for that reason, they are being addressed separately, with

references to the responses to the Sierra Club comments as appropriate. All comments received are considered important and reflect the concerns of the community about air quality and public health. Additionally, many comments received during the public comment period, while important to the community, were not necessarily related to the air permit review.

To summarize, three different groups of comments will be addressed as outlined below:

- Comments submitted by the Sierra Club
- Other comments related to the air permit that were not submitted by the Sierra Club
- Comments not related to the air quality permit

The comments will be discussed in that order. Actual comments are included in the appendix to this document. Below are summaries of the comments.

#### Comments Submitted by the Sierra Club

##### *Sierra Club Comment 1:*

*The permit should include modeling-based, numerical emission limits for SO<sub>2</sub> stringent enough to guarantee that pollution from the Asheville Plant will not cause or contribute to exceedances of the 75-ppb air quality standard for SO<sub>2</sub> downwind of the Plant.*

Sierra Club submitted third party modeling results that show that SO<sub>2</sub> emissions from DEP have the potential to cause exceedances of the 1-hour SO<sub>2</sub> NAAQS that was issued by EPA in 2010. The analysis they commissioned predicted that SO<sub>2</sub> levels “nearly 3.5 times the higher than the governing health-based standard” could occur. They have stated that the limits in the permit are not stringent enough, and should be revised to 61.7 pounds per hour for each unit. “Based on the Btu rating of each boiler as listed in the Draft Permit, this SO<sub>2</sub> emissions rate would equate to an average rate across both units of 0.029 lb/MMBtu—approximately 80 times more stringent than the proposed limit. Thus, in order to ensure that the Plant’s emissions do not cause or contribute to the exceedance of the 75-ppb standard, a numerical emission limit at least as stringent as 0.029 lb/MMBtu is necessary.”

Sierra Club stated that the Agency should not “feel constrained” by section 4.0516(a) of our code, which sets the applicable SO<sub>2</sub> limit of 2.3 pounds of sulfur dioxide per million BTU input. “The NC DAQ has relied on the narrative prohibition on pollution that causes the exceedance of air quality standards to impose more stringent numerical limits for SO<sub>2</sub> emissions than provided for in other regulatory provisions.” Regarding this comment, they cited Air Quality Permit 01001T48 for Roxboro Steam Electric Plant “at 8 (citing 15A NCAC 2D.0501(c) as ‘applicable regulation’ requiring a numerical emission limit more stringent than 2.3 lbs/MMBtu).” “Thus, WNCRAQA should not feel constrained by section 4.0516(a) of its Code, which provides that the ‘emission of sulfur

dioxide shall not exceed 2.3 pounds of sulfur dioxide per million BTU input.’ This provision establishes a regulatory floor; WNCRAQA has the authority and indeed the duty, per section 4.0501(c), to set permit limits that are more stringent in order to ensure the protection of public health and the attainment of air quality standards.”

*Agency Response:*

As previously explained by EPA, *In the Matter of EME Homer City Generation LP et al*, Order on Petition numbers III-2012-06, III-2012-07, and III-2013-02 (July 30, 2014) at 11, and *In the Matter Public Service of New Hampshire et al*, Order on Petition number V1-2014-04 (July 28, 2015) at 6, promulgation of a National Ambient Air Quality Standard (NAAQS) does not, in and of itself, result in an applicable requirement in the form of an emission limit for Title V sources. Rather, the measures contained in each state's EPA- approved SIP to achieve the NAAQS are applicable requirements. See 40 C.F.R. § 70.2. The CAA provides that the EPA sets the NAAQS, and the states determine how best to attain and maintain the NAAQS within their boundaries. As the EPA has explained in prior orders, a NAAQS by itself does not impose any obligation on sources. "A source is not obligated to reduce emissions as a result of the (NAAQS) until the state identifies a specific emission reduction measure needed for attainment (and applicable to the source), and that measure is incorporated into a SIP approved by EPA."<sup>1</sup> As such, promulgation of the 1-hour SO<sub>2</sub> NAAQS does not, in and of itself, mandate the emission limits requested by the Sierra Club.

While there is a more stringent SO<sub>2</sub> limit in the Roxboro permit per 15A NCAC 2D.0501(c), this limit was required as a result of modeling that was conducted several years ago to address the 1971 SO<sub>2</sub> NAAQS. Modeling was required by EPA and North Carolina (NC) as part of the SIP approval process for North Carolina’s SO<sub>2</sub> limit of 2.3 pounds per million BTU input.<sup>2</sup> As such, this limit is not related to the 2010 SO<sub>2</sub> NAAQS, and cannot be used by the Agency to justify including a more stringent emissions limit to address the 2010 SO<sub>2</sub> standard in the permit as part of this renewal, which would bypass the attainment planning (SIP) process as described below.

<sup>1</sup>Decision on Reconsideration of Petition to Object to Title V Permit for Reliant Portland Generating Station, Upper Mount Bethel Township, Northampton County, PA, 73 Fed. Reg. 64615 (October 30, 2008); *see also In the Matter of Marcal Paper Mills, Inc.*, Order on Petition No. II-2006-001 (Nov. 30, 2006) at 13; *In the Matter of East Kentucky Power Cooperative Inc., William C. Dale Power Station*, Order on Permit No. V-08-009 (Dec. 14, 2009) at 5; *Cate v. Transcontinental Gas Pipe Line Corp.*, 904 F. Supp. 526, 530 (W.D. Va. 1995) ("It is well-established that the NAAQS are not an 'emission standard or limitation' as defined by the Act.").

<sup>2</sup>Memo to the NC DAQ Air Quality Section from Thom Allen of NC DAQ dated 10/22/1992 entitled “Special Sulfur Dioxide Sources” related to 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources.” The memo states that when the Board of Water and Air Resources (now the Environmental Management Commission) originally adopted SO<sub>2</sub> emission limits for fuel combustion sources in 1971, new sources were required to meet an emission standard of 1.6 pounds of SO<sub>2</sub> per million BTU. Existing fuel combustion source were required to meet an emissions standard of 2.3 pounds of SO<sub>2</sub> per million BTU. By July 1, 1980, all sources were required to comply with an emissions standard of 1.6 pounds of SO<sub>2</sub> per million BTU. After several years of monitoring data were collected in which it was demonstrated that there was no ambient sulfur dioxide problem, the Commission changed the limit for all sources to 2.3 pounds of SO<sub>2</sub> per million BTU, and abolished the 1980 reduction. Before the EPA would accept this amendment, they required a modeling demonstration that the 2.3 pounds of SO<sub>2</sub> per million BTU emission standard would protect the ambient air quality standard for SO<sub>2</sub>. All significant combustion sources of SO<sub>2</sub> were modeled. Except for a few sources, the standard was demonstrated to be adequate. Further analyses was required for 18 facilities. The only coal fired power plant in that group of 18 was Duke’s plant at Cliffside. The 18 facilities were required to accept more stringent limits, which were incorporated into NC’s SIP.

Sierra Club has stated that the Agency has the authority and the duty to impose a more stringent SO<sub>2</sub> limit than that which is currently in our regulations per Chapter 4. 0501(c) of the WNCRAQA Code (which is the same as 15A NCAC 2D.0501(c) in the state code), which contains broad language indicating that “controls more stringent than named in the applicable emission standards in this Section” may be required “to prevent violation of the ambient air quality standards.” Sierra Club made a similar argument in the petition they submitted that was addressed *In the Matter of EME Homer City Generation LP et al.* Sierra Club cited what EPA referred to in their response as “broad, sweeping state-derived SIP provisions” (at 19) in the Pennsylvania (PA) SIP to argue that PA Department of Environmental Protection (DEP) could require a more stringent SO<sub>2</sub> limit than what was in their code as part of the Title V permit renewal to address alleged NAAQS exceedances supported by the modeling Sierra Club submitted. PA DEP (at 13) argued that the broad SIP provisions in their code that were cited by the Sierra Club require facilities to comply with any revisions to the regulations “which are promulgated as part of the SIP revisions undertaken to achieve and maintain compliance with a new or revised NAAQS. These regulations do not authorize the Department to impose additional SO<sub>2</sub> limits in Homer City’s TVOP outside of the SIP revision process.” EPA cited the PA DEP interpretation of their code and summarized it as follows at 13: “PaDEP’s interpretation is that the general SIP provisions cited to by Petitioners do not provide PaDEP with the authority to impose the type of SO<sub>2</sub> emission limit sought by the Petitioners; such limit or the underlying basis for such a limit would first need to be included in the SIP revisions responding to Pennsylvania’s 1-hour SO<sub>2</sub> NAAQS planning process.” The EPA cited other related case law and concluded that PA’s interpretation of the broad sweeping language in their rules was not unreasonable. As such, the petition regarding those claims was denied (at 19). It is this Agency’s interpretation that the broad sweeping language in our code is not meant to authorize the Agency to set requirements outside of the SIP process. As stated above, the more stringent limit in the Roxboro permit was determined prior to the publication of the 2010 SO<sub>2</sub> NAAQS and in response to negotiations between EPA and NC related to the 1971 SO<sub>2</sub> NAAQS and NC’s SO<sub>2</sub> limit of 2.3 pounds per million BTU input. All applicable SO<sub>2</sub> requirements are included in the draft permit for DEP.

The paragraph below was included in the permit review document for the draft permit. The Data Requirements Rule has since been finalized, the schedule in the rule closely mirrors the proposed rule, which is discussed below.

From the WNCRAQA Permit Review for the draft permit: “1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary NAAQS”

On June 22, 2010, the EPA revised the Primary National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The new 1-hour standard is 75 parts per billion (calculated as the 99<sup>th</sup> percentile averaged over three years). Since publishing the standard, the EPA has been working with stakeholders on the implementation process.

Part of this process is requiring air agencies to characterize SO<sub>2</sub> emissions for the purposes of implementing the new SO<sub>2</sub> standard, which will allow the EPA to designate which areas will be in nonattainment. The EPA proposed the *Data Requirements Rule for the 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)* on May 13, 2014. This proposed rule details the requirements for a state agency to provide data to the EPA so the EPA in turn can make final SO<sub>2</sub> NAAQS attainment designations. The proposed rule includes an anticipated timeline for the attainment designation process. The air agency will be required to submit a list of applicable sources located in its jurisdiction to the EPA by January 15, 2016. For each area containing an applicable source, the air agency shall state whether it will characterize air quality through ambient air quality monitoring or through air quality modeling techniques. For areas that are characterized using a modeling analysis, it is expected that modeling will be completed and submitted to the EPA by January 2017, and that final designations for these areas will be completed by December of 2017. For areas that elect to characterize air quality through ambient monitoring, the monitors are to be operational by January 2017. Three years of data will be collected, with the EPA issuing final designations by December of 2020. State attainment plans will be due in August of 2022. A final rule is expected later this year. The Agency, along with the North Carolina Division of Air Quality, will establish any enforceable emission limits as necessary per the process outlined above. Should this facility submit an application for an increase in SO<sub>2</sub> emissions that triggers the PSD regulation (WNCRAQA Code 4.0530), the facility must demonstrate the project will not cause or contribute to a violation of the 1-hour SO<sub>2</sub> standard. Approval for an increase, including enforceable emission limitations, would be handled through the construction permit process. No modeling analysis is required for the 1-hour SO<sub>2</sub> standard at this time.”

As stated by EPA *In the Matter of EME Homer City Generation LP et al* at 22, “The appropriate time for implementing requirements for the 2010 1-hour SO<sub>2</sub> NAAQS is through the attainment planning process contemplated by section 172 of the CAA after the EPA has designated an area nonattainment for the given NAAQS.”

*Sierra Club Comment 2:*

*The permit should include modeling-based, numerical emission limits for NO<sub>x</sub> stringent enough to guarantee that pollution from the Asheville Plant will not cause or contribute to exceedances of the 100-ppb air quality standard for NO<sub>x</sub> downwind of the Plant*

*Agency Response:*

As previously explained by EPA, *In the Matter of EME Homer City Generation LP et al*, Order on Petition numbers III-2012-06, III-2012-07, and III-2013-02 (July 30, 2014) at 11, and *In the Matter Public Service of New Hampshire et al*, Order on Petition number V1-2014-04 (July 28, 2015) at 6, promulgation of a National Ambient Air Quality Standard (NAAQS) does not, in and of itself, result in an applicable requirement in the

form of an emission limit for title V sources. Rather, the measures contained in each state's EPA- approved SIP to achieve the NAAQS are applicable requirements. See 40 C.F.R. § 70.2. The CAA provides that the EPA sets the NAAQS, and the states determine how best to attain and maintain the NAAQS within their boundaries. As the EPA has explained in prior orders, a NAAQS by itself does not impose any obligation on sources. "A source is not obligated to reduce emissions as a result of the (NAAQS] until the state identifies a specific emission reduction measure needed for attainment (and applicable to the source), and that measure is incorporated into a SIP approved by EPA."<sup>1</sup> As such, promulgation of the 1-hour NO<sub>2</sub> NAAQS does not, in and of itself, mandate the emission limits requested by the Sierra Club.

EPA, in the response to the Homer City petition response cited above, responds to a similar claim regarding the NO<sub>2</sub> NAAQS and averaging time for emissions limits: "As explained in our response to Claims 1 and 2 above, the EPA's basis for denying the earlier claims regarding the 2010 1-hour SO<sub>2</sub> NAAQS also apply to the present claim regarding the 2010 1-hour NO<sub>2</sub> NAAQS." They go on to state that no hourly NO<sub>2</sub> or NO<sub>x</sub> emissions limits are required to be included to address the NO<sub>2</sub> NAAQS in the renewal of the Title V permit at issue at that time.

*Sierra Club Comment 3:*

*The Permit should include one hour averaging times for SO<sub>2</sub> and NO<sub>x</sub> emission limits. Sierra Club stated that since the SO<sub>2</sub> and NO<sub>x</sub> standards are one hour standards, emission limits should have the same averaging times.*

*Agency Response:*

The averaging time for the SO<sub>2</sub> emissions limit has been defined as a 24-hour block period in Chapter 4. 0608 of the WNCRAQA Code which states:

"The owner or operators of any sources subject to this Rule that are required to monitor emissions of sulfur dioxide under any other Local, State, or Federal rule with continuous emission monitoring systems shall monitor compliance with the sulfur dioxide emission standard in Rule .0516 of this Chapter with a continuous emission monitoring system. Compliance with sulfur dioxide emission standards is determined by averaging hourly continuous emission monitoring system values over a 24-hour block period beginning at midnight."

Similarly, the averaging time for the NO<sub>2</sub> emissions limit has been defined as a 24-hour block period in Chapter 4. 0606 of the WNCRAQA Code which states:

"The owner or operators of any sources subject to this Rule that are required to monitor emissions of sulfur dioxide or nitrogen oxides under any other Local, State, or Federal rule with continuous emission monitoring systems shall monitor compliance with the

sulfur dioxide emission standard in Rule .0516 of this Chapter and the nitrogen oxide emission standard in Rule .0519 or Section .1400 of this Chapter with a continuous emission monitoring system. Compliance with sulfur dioxide and nitrogen oxide emission standards are determined by averaging hourly continuous emission monitoring system values over a 24-hour block period beginning at midnight.”

The regulations cited above referencing the emissions limits and averaging times have been approved in the NC SIP. As such, the Agency has determined that they are appropriate and will remain as written in the draft permit. As explained above in the response to Sierra Club Comment 1 and 2, the Title V permit is not required to include limits to ensure compliance with the 1-hour SO<sub>2</sub> and NO<sub>x</sub> standards at this time.

*Sierra Club Comment 4:*

*The permit should require that all air control pollution technology be operated continuously and in accordance with best engineering practices.*

Sierra Club commented that they commissioned a study (included in their comments) that found that DEP is not operating the flue gas desulfurization systems (“FGD systems” or “scrubbers”) and selective catalytic reduction systems (“SCRs”) at the maximum possible efficiency levels at which the systems were designed to operate.

“Both scrubbers are designed to achieve 97% SO<sub>2</sub> removal efficiency, and, following their installation, both were tested and found to actually be removing more than 97% of the SO<sub>2</sub> generated in the Plant’s two boilers. Nevertheless, in 2009, Duke reported scrubber efficiencies of 93.1% and 93.8% for Asheville Units 1 and 2, respectively. Between 2009 and 2012, Duke’s self-reported annual scrubber efficiencies remained low, averaging around 93%. Moreover, Duke’s permit application assumes an even lower scrubber efficiency value of 90%. Independent calculations of actual scrubber performance paint an even worse picture: scrubber efficiency as low as 78% for Unit 2 in 2011.”

“Similarly, based on a preliminary analysis of Duke’s operations of the pollution control equipment designed to remove NO<sub>x</sub>—a selective catalytic reduction system (“SCR”) for each unit—it appears that these systems likely are not achieving the NO<sub>x</sub> removal efficiencies that they were designed to achieve. The SCR systems were installed at Asheville Units 1 and 2 in 2007 and 2006, respectively and were designed to remove a minimum of 90% of NO<sub>x</sub> from the boiler flue gas. However, the permit application submitted by Duke Energy to WNCRAQA assumes only 70% removal efficiency for the Plant’s SCR systems. Indeed, NO<sub>x</sub> emission rates in recent years have increased compared to the rates being achieved immediately following SCR installation.”

Sierra Club also commented that the Draft Permit includes a footnote that specifies that the FGD and SCR systems were to be operated on an “as-needed basis.” They stated that those provisions should be removed.

Agency Response:

The footnote referenced by the Sierra Club indicating that the control equipment is to be operated on an “as needed basis” reads as follows. For the FGDs: “For compliance with the North Carolina Clean Smokestacks Act (SB 1078 – Air Quality / Electric Utilities Bill). To be operated on an as-needed basis.” For the SCRs: “For ozone season NO<sub>x</sub> control and compliance with the North Carolina Clean Smokestacks Act (SB 1078 – Air Quality / Electric Utilities Bill). To be operated on an as needed basis.” The FGDs and SCRs were installed to meet the requirements referenced here. Duke Energy Progress appears to be meeting all emissions limits for SO<sub>2</sub> and NO<sub>x</sub> in their current permit.

Sierra Club Comment 5:

*Permit does not address alleged violation of the one hour SO<sub>2</sub> standard. No compliance schedule is included in the permit.*

“As shown by the air dispersion modeling discussed above, SO<sub>2</sub> emissions from the Asheville Plant have, in recent years, caused the frequent exceedance of the 75-ppb air quality standard in communities downwind of the Plant in violation of the current permit’s narrative emission limit. Nevertheless—and despite Sierra Club’s bringing this fact to WNCRAQA’s attention in advance of the publication of the Draft Permit—the provisions in the Draft Permit that pertain to SO<sub>2</sub> pollution are nearly identical to those included in the current permit.”

“A Title V permit must address and include provisions for achieving compliance with current violations of applicable requirements. Accordingly, permits must contain “a description of the compliance status of the source,” “a narrative description of how the source will achieve compliance” with requirements for which it is in noncompliance, and “a schedule of compliance for sources that are not in compliance with all applicable requirements at the time of permit issuance.” The compliance schedule must identify “remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance.”

Agency Response:

As stated above, the Sierra Club has not demonstrated that promulgation of a NAAQS results in an applicable requirement for Title V permitting purposes, outside of the attainment designation and SIP process. When responding to a similar comment in the Homer City Petition response at 24, EPA indicated that since 1-hour SO<sub>2</sub> emissions limits were not required to be included in the permit prior to the attainment planning process,

the air dispersion modeling submitted by the petitioners was not relevant to their claim. “The Homer City Petitioner did not demonstrate the Homer City Facility is in violation of its "current permit" as claimed by the Petitioner based on the air dispersion modeling documents submitted with its Petition.” As such, no compliance schedule is required to be included in the permit at this time.

*Sierra Club Comment 6:*

*The permit does not include a detailed permit condition for MATS, or a compliance schedule if the facility is not in compliance by April 16, 2015.*

Sierra Club pointed out that while there is placeholder language in the permit addressing 40 CFR 63, Subpart UUUUU "National Emission Standards for Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units," also known as the Mercury and Air Toxics Standards (MATS), specific compliance options are not detailed in the permit condition.

“Some details about Duke’s plan for MATS compliance were provided in a request for a minor air permit modification that was submitted to WNCRAQA on March 26, 2015, curiously, the same day that WNCRAQA give the public notice of the opportunity to comment on the Draft Permit. Given that the compliance deadline for EPA’s new rule of April 16, 2015 has undoubtedly been known by Duke since the rule was finalized in February 2012, it is a wonder that the company waited until just three weeks before that deadline to start the process of demonstrating to WNCRAQA how the Asheville Plant will comply with MATS.” Sierra Club noted that it was not clear “whether this request was properly styled as a minor modification.”

“In any event, the public must be able to understand how Duke will comply with the new standard and to rely on enforceable permit conditions that specify emission limits and monitoring options. Neither the Draft Permit nor the modification request make clear what MATS limits apply at the Asheville Plant and how compliance with them will be monitored. The Draft Permit should be revised to include the specific, enforceable limits necessary to ensure compliance with the MATS rule, and, to the extent the Plant was out of compliance with the standard as of April 16, 2015, the Draft Permit should address those violations and ensure that future violations will not occur.”

*Agency Response:*

As explained in the permit review document, the Asheville Plant's two coal-fired boilers are subject to the provisions of 40 CFR 63, Subpart UUUUU "National Emission Standards for Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units," also known as the Mercury and Air Toxics Standards (MATS). The regulation was finalized on February 16, 2012. Compliance with the standards is required by April 16, 2015.

On December 15, 2014, DEP requested an extension for certain work practice compliance requirements for startup and shutdown periods until April 16, 2016. The Agency granted this extension with certain requirements. These include that DEP apply for a modification to the permit and a progress report to the Agency by April 16, 2015.

The Agency issued the public notice on the draft permit and submitted the permit to EPA for review on March 26, 2015, with the intent of having the 45 day EPA review period concluded prior to the board meeting date on May 11, 2015, which is when the board would typically take action on the proposed permit renewal, so that the permit would be renewed prior to the expiration date, which was May 31, 2015. A placeholder condition, referencing the rule and compliance date, was included in the draft permit. The progress report was received by the Agency on March 26, 2015. The permit modification application was received on March 31, 2015. The permit modification request that was submitted by DEP was for a minor modification. The Agency contacted DEP and let them know that since a compliance extension had been requested for certain MATS requirements, the modification would have to be processed using the significant modification procedures. Duke agreed to this and submitted the additional permit modification fee for a significant modification. The Agency will include more specific MATS permit conditions in the permit during the upcoming modification, which will be processed after the permit is renewed.

Duke is required to comply with MATS, regardless of whether the detailed condition is included in the permit. The permit application referenced above includes the compliance strategy to address the specific MATS requirements. Compliance certification requirements are specified in General Condition P of the permit. A compliance extension has been granted for certain work practice requirements. DEP appears to be in compliance with the requirements. As discussed above, regarding Sierra Club Comment 5, a compliance schedule is not required to be included in the permit because the facility appears to be in compliance with the requirements at this time.

*Sierra Club Comment 7:*

*The Draft Permit allows for the use of “unbiased” values in connection with monitoring and recordkeeping requirements (draft permit pages 6, 7, 20). The permit record does not include any rationale for the use of unbiased values and such use is inconsistent with federal regulations, which provide for the use of “bias-adjusted” values when substituting for missing data (40 C.F.R. Part 75, Appx. A, Sec. 7.6.5(f)). The Agency should revise the Draft Permit to comport with federal regulations.*

*Agency Response:*

The actual wording of one of the three permit conditions that were cited by Sierra Club is as follows:

“Monitoring/Recordkeeping [WNCRAQA Code 4.0605(b), 17.0317(b), & 17.0508(f)]  
To assure compliance with the limitation given in Section 2.2(C)(1) above, the Permittee shall determine nitrogen oxide emissions in pounds per hour using a CEMS meeting the requirements of 40 CFR Part 75, except that unbiased values may be used (missing data shall be filled in accordance with 40 CFR Part 75).”

The permit language cited above is found in the monitoring provisions where CEMs are utilized to monitor compliance with state SO<sub>2</sub> and NO<sub>x</sub> limits and a PSD avoidance limit. In consultation with permitting and enforcement staff with NC DAQ, which has the same language in some of their permits for similar sources, it was determined that Part 75 monitoring is not required to assure compliance with any of these regulations. Part 75 monitoring is required for the Acid Rain Program. Permit writers typically cite the CEMs related monitoring provisions of either 40 CFR Part 60 or 40 CFR Part 75 in the permit conditions for these rules as a way of requiring a consistent set of procedures that are established and already in use by the facility. In general, Part 75 requirements are more stringent than Part 60, Appendices B and F requirements. The language allowing the use of unbiased values is not included in the permit condition that addresses the Acid Rain Program or the Clean Air Interstate Rule (CAIR) program, where all Part 75 requirements apply and are required to be followed.

In general, “bias –adjusted values” were used in “trading” related rules such as Acid Rain and CAIR to ensure consistent treatment of allowance allocations and trading, thus ensuring the integrity of those programs. CEMS that measured consistently below the reference method (RM) data during the RATAs are required to adjust future measurements, and those that measured above the RM data (biased high) are not required to adjust future measurements. “Bias –adjusted values” have not traditionally been used in our state (and local) rules where the focus is on ensuring compliance with an emission limitation. Any use of bias-adjusted values in determining compliance with an emission limit might indicate the use of a calculated value (as opposed to an actual source emitting value) in determining compliance status of that source. To determine compliance, it is not necessary to have data at all available periods, some level of missing data can be tolerated just as a once a year stack test can be used to establish compliance status of a source. Therefore, the decision to use either “unbiased” or “biased –adjusted values” should depend on the intended use of the data. If a rule requires (or implies) that data must be available at all times in order to determine compliance with that rule, then no missing data is allowed, the “gap” must be filled. Also, the intended use of that data should determine whether to fill the “gap” with “unbiased value” or “bias- adjusted value.”

After considering the factors above, the Agency has determined that the permit condition is written appropriately and no changes have been made to the draft permit to address this comment. As stated above, Part 75 requirements apply to the Acid Rain Program and other trading programs including CAIR, the language cited by Sierra Club is not included in the permit conditions that address those requirements. DEP must comply with Part 75 for those programs.

*Sierra Club Comment 8:*

*Make available all information and materials relied upon for permit issuance.*

"Specifically, The Draft Permit requires a malfunction abatement plan,<sup>53</sup> but such plan is not available for review by the public. In addition, Duke Energy's permit application includes numerous unsupported assumptions and relies on documents that have not been made available to the public (it is unclear whether they were provided to Agency staff). Because the permit application and all supporting information and materials are part of the final Title V permit, it is important that such information and materials are available for review by the public and the Agency. We, therefore, request that the missing materials identified herein, to the extent they are within the Agency's control, be provided to the public. In addition, we request that additional time for public comment on the Draft Permit Renewal be afforded once those materials are produced and in light of the voluminous permit renewal record, some documents of which we were able to obtain for the first time this week."

"Materials relied upon in the permit application, but not made available include:<sup>54</sup> EPRI Report, Electric Utility Trace Substances Synthesis Report;<sup>55</sup> basis for assumption that control efficiency from hydrated lime addition is 40%;<sup>56</sup> basis for assumption that ammonia slip from the SCR catalyst is limited to 2 ppm;<sup>57</sup> basis for assumption that volumetric flow rate is 500,000 cubic feet per minute (for ammonia mass calculation);<sup>58</sup> source of various wind speed and moisture inputs;<sup>59</sup> EPRI PISCES Database (version 2005a);<sup>60</sup> metals speciation for limestone;<sup>61</sup> metals speciation for gypsum;<sup>62</sup> metals speciation for hydrated lime;<sup>63</sup> and basis for assumption about 27% control level for mercury.<sup>64</sup>"

"Finally, we highlight the following additional issues with the permit application. The permit application presents various emissions calculations that relate to EDTA reference data from the Roxboro and Robinson plants; it is not clear to us why this data would be relevant to the permitting of the Asheville Plant.<sup>65</sup> The permit application refers to the EPA TANKS 4.0 program,<sup>66</sup> but we note that EPA has discontinued its support of this

<sup>53</sup>Draft permit at 14. <sup>54</sup>This list of materials refers to those parts of the permit application that concern Unit 1; similar materials are missing from the parts of the application concerning Unit 2 and also are hereby requested. <sup>55</sup>Permit application at 107. <sup>56</sup>*Id.* at 108. <sup>57</sup>*Id.* <sup>58</sup>*Id.* at 109. <sup>59</sup>*Id.* at 129, 134, 148. <sup>60</sup>*Id.* at 129, 130. <sup>61</sup>*Id.* at 134, 142. <sup>62</sup>*Id.* at 149. <sup>63</sup>*Id.* at 155. <sup>64</sup>*Id.* at 157. <sup>65</sup>*Id.* at 111-118, 157. <sup>66</sup>*Id.* 176-80.

program and has upgraded to TANKS 4.09D.<sup>67</sup> The permit application includes a calculation of the Plant's potential to emit that improperly uses average emission factors for various metals,<sup>68</sup> when, instead, the calculation should use maximum emission factors. In addition, because the Draft Permit does not specify a particular coals type, the applicability of the metal tests provided in the permit application is not sufficient.”

*Agency Response:*

The Agency responded by sending the majority of this information. Some items were carried over from previous submittals where they were previously accepted by this Agency. The malfunction abatement plan is required to be kept on file at the facility for Agency staff to view during inspections. We do not have a copy at the Agency and as such, did not provide it. The items mentioned here do not have any implications of regulatory significance and are not pertinent to this renewal. The Sierra Club was informed that they were welcome to come look through all of the files for more information including the original submittals of this miscellaneous information. They chose not to do so.

*Sierra Club Comment 9:*

Provide additional time for public comment.

*Agency Response:*

The comment period, originally scheduled to conclude on April 30, was extended to May 7, 2015. The Sierra Club did not submit additional comments after April 30<sup>th</sup>.

Other Comments Submitted by Citizens (that were not submitted by the Sierra Club)

*Other Comment 1:*

*Duke is not operating the scrubbers at full capacity and they are using cheaper, higher sulfur coal.*

Many of these comments referenced the study that was commissioned by the Sierra Club, which was discussed above under *Sierra Club Comment 4*. Sierra Club commented that they commissioned a study that found that Duke Energy Progress is not operating the flue gas desulfurization systems (“FGD systems” or “scrubbers”) at the maximum possible efficiency levels at which the systems were designed to operate.

Several commenters submitted a letters and emails that included the following statements, and similar statements:

“We now know the company has for years been failing to operate its pollution control equipment fully at the Asheville coal plant. This, combined with choosing to burn higher

<sup>67</sup>U.S. EPA, TANKS Emissions Estimation Software, Version 4.09D, [www.epa.gov/ttnchie1/software/tanks/](http://www.epa.gov/ttnchie1/software/tanks/). <sup>68</sup>Permit application at 110-18.

sulfur-content coal, has resulted in sulfur dioxide pollution at concentrations of as much as 3.5 times higher than EPA's health-based air quality standard."

"Duke's choice to burn higher sulfur-content coal and its failure to run its air pollution controls fully have resulted in SO<sub>2</sub> pollution at concentrations as much as 3.5 times over EPA's current health standard."

The reference to SO<sub>2</sub> levels as much as 3.5 times higher than EPA's standards is addressed below in *Other Comments 2*.

*Agency Response:*

As discussed above in the response to *Sierra Club Comment 4*, the FGDs (scrubbers) were installed to enable the facility to comply with the North Carolina Clean Smokestacks Act (SB 1078 – Air Quality / Electric Utilities Bill). They are also utilized to ensure compliance with CAIR and the Acid Rain Program. There are no limitations on the sulfur content of coal that DEP is allowed to burn. The facility is required to utilize CEMs to determine compliance with SO<sub>2</sub> limits in their permit. DEP appears to be meeting all emissions limits for SO<sub>2</sub> in their current permit.

*Other Comment 2:*

*Sierra Club reports have found that SO<sub>2</sub> emissions from DEP are causing exceedances of the national health based standards. Limits in the permit should be revised to 61.7 lb/hr for each coal-burning unit, equating to a plantwide average SO<sub>2</sub> emission limit of 0.029 lb/MMBtu.*

Several comments included the following statements and other similar statements:

"The new draft permit contains the same woefully inadequate numeric emission limit for sulfur dioxide that have allowed this harmful pollution over the past few years--nearly 80 times higher than the limit necessary to attain EPA's public health standard."

"New evidence shows that operations at Duke Energy's Asheville coal plant have been causing SO<sub>2</sub> pollution at concentrations up to 3.5 times higher than what EPA has determined to be safe in neighborhoods downwind of the plant."

*Agency Response:*

Please see the response to *Sierra Club Comment 1* above.

*Other Comment 3:*

*Several commenters questioned why the SO<sub>2</sub> emission limit in the draft permit is 2.3 pounds per million BTU heat input. Statements were made indicating that other Duke Energy plants in NC have lower emission limits. This limit can be met by a plant with no SO<sub>2</sub> controls (scrubbers).*

“There is ample precedent for the Agency to require a more stringent SO<sub>2</sub> permit. Coal plants in other NC counties, have established numeric limits for SO<sub>2</sub> emissions that are more stringent than those proposed for Asheville.” Several commenters at the hearing stated that “Every coal plant in North Carolina has a lower SO<sub>2</sub> limit.”

*Agency Response:*

These units are subject to this standard (Chapter 4 .0516 - Sulfur Dioxide Emissions from Combustion Sources) because they combust sulfur-containing fuels. This regulation limits SO<sub>2</sub> emissions from each unit to 2.3 pounds per million BTU heat input. A source subject to an emission standard for sulfur dioxide in Rules .0524, New Source Performance Standards (NSPS), .or .1111, Maximum Achievable Control Technology (MACT) of this Chapter shall meet the standard in that particular rule instead of the standard in Paragraph (a) of this Rule.

Units 1 and 2 were constructed in 1964 and 1971 respectively and as such, are not subject to a NSPS, which would have a lower emissions limit. Units 1 and 2 are subject to a MACT standard, 40 CFR Part 63, Subpart UUUUU – “Coal- and Oil Fired Electric Steam Generating Units (Utility MACT).” Facilities were required to be compliant by April 16, 2015. Units 1 and 2 are required to comply with numerical emission limits for mercury (Hg), filterable particulate matter (PM, a surrogate for non-mercury HAP metals), and hydrochloric acid or sulfur dioxide (HCl or SO<sub>2</sub>, surrogates for acid gases). As stated in the permit review document, the compliance strategy for the Asheville facility currently includes the use of the SO<sub>2</sub> surrogate for the acid gases category. DEP is currently demonstrating compliance with the acid gases standard by meeting the sulfur dioxide limit, which is 0.2 pounds per million BTU heat input. However, based on changing fuel blends, it may become necessary in the future for DEP to switch compliance approaches and begin using the quarterly HCl stack testing approach. Should it become necessary to switch compliance approaches, the conversion will need to occur relatively quickly to ensure continuous compliance with the 30-boiler operating day averages. As such, the facility received authorization to "preemptively" prepare a site-specific test plan for conducting hydrogen chloride testing in accordance with Method 26A and make the required 60-day submittals. Once it becomes necessary to "activate" this compliance approach, testing could occur as soon as 15-days. DEP has submitted a site specific test plan for conducting hydrogen chloride testing in accordance with Method 26A and the requirements of 40 CFR 63, Subpart A, 63.7(b) and (c). This request was received by the Agency on February 25, 2015.

Since the SO<sub>2</sub> limit in the MACT standard is a surrogate for another pollutant limit (acid gases), and DEP has the flexibility to comply with that limit or another limit, it is this Agency's interpretation that the limit in Chapter 4 .0516 does still apply, in addition to the limit in the MACT standard, as described above. As such, it is properly placed in the permit.

Commenters did not cite a specific NC Duke or other “coal plant” permit with a more stringent SO<sub>2</sub> limit (with the exception of Roxboro that was cited by the Sierra Club and discussed above), but it is expected that other units built after February 28, 2005 would have more stringent limits if they were subject to an NSPS standard (40 CFR Part 60 Subpart Da-Standards of Performance for Electric Utility Steam Generating Units). Upon further review of additional permits for coal fired power plants in NC, it was determined that similar to the situation with Roxboro, which was discussed above under *Sierra Club Comment 1*, where we acknowledged that “While there is a more stringent SO<sub>2</sub> limit in the Roxboro permit per 15A NCAC 2D.0501(c), this limit was required as a result of modeling that was conducted several years ago to address the 1971 SO<sub>2</sub> NAAQS. Modeling was required by EPA and North Carolina (NC) as part of the SIP approval process for North Carolina’s SO<sub>2</sub> limit of 2.3 pounds per million BTU input.” In the 1980’s when NC DAQ proposed to change the SO<sub>2</sub> limit to 2.3 pounds per million BTU input, EPA required that modeling be conducted for large SO<sub>2</sub> sources to ensure the NAAQS would not be violated, as a condition for SIP approval. The Asheville plant was modeled at that time and found to be in compliance, no exceedance of the NAAQS was predicted. The agency has now determined as part of this public comment process and associated research that the NC DAQ required some of the coal fired power plants (Belews Creek, Allen, Marshall and Roxboro) to remodel for compliance with the SO<sub>2</sub> NAAQS when stacks were modified and scrubbers were installed to meet the requirements of the NC Clean Smokestacks Act (this occurred between 2003 and 2008 for the plants listed above).

In 2003, when Progress Energy Carolinas, Inc. (PEC) submitted an application to install scrubbers and SCRs at the Asheville plant, this was the first such application submitted in NC. The Agency did not require that modeling be conducted again (as stated above, modeling had been conducted for this plant back in the 1980s when it appears that all other coal fired power plant units in NC were modeled for compliance with the 1971 SO<sub>2</sub> NAAQS). Since emissions were being reduced by approximately 90%, and previous modeling showed compliance, it was not apparent that modeling should be redone. The modeling that was conducted in the 1980s was not mentioned in the permit review in 2003. There were notes concerning Chapter 4.0533 – “Stack Height,” and an analysis by Progress Energy that indicated the proposed new stack height of 327 feet would be sufficient to preserve local air quality. The facility conducted a screening level complex terrain dispersion modeling analysis using the new stack parameters and emission reductions associated with that modification and indicated a significant improvement in ambient predicted concentrations over current conditions at the facility. The modeling analysis referenced above was not included in the permit application. Based on the review of the other NC DAQ permits, it appears that several of the other coal fired power plants also modeled compliance with the SO<sub>2</sub> standard in the 1980s, but when they were required to remodel in the early 2000s with the lower stack heights, they had to take

lower limits to model compliance. That being the case, it now appears that the Agency should have requested that modeling be conducted for SO<sub>2</sub> in 2003 when the stacks were modified for the installation of the scrubbers. As such, on November 30, 2015, the agency requested that DEP submit additional information to show that they could comply with the SO<sub>2</sub> standard that was in effect in 2003 when the stacks were modified for the installation of the scrubbers. A modeling protocol was submitted by DEP on January 14, 2016. The protocol was approved on January 29, 2016. A retroactive modeling analysis for 3, 24-hour, and annual SO<sub>2</sub> standards was submitted by DEP on February 18, 2016. DEP was able to model compliance with a mass-based emissions rate of 53,760 pounds of SO<sub>2</sub> per 24-hour period for the two coal-fired units. Actual emissions are well below these levels. The Agency asked the NC DAQ to review the modeling. In a memorandum dated February 29, 2016, Tom Anderson of the Air Quality Analysis Branch concluded that the modeling adequately demonstrates that the NAAQS standards in effect in 2003 would have been met at the modeled emission rates. The analysis included seven DEP sources and numerous SO<sub>2</sub> sources from the surrounding area. All sources at DEP were modeled at their permitted limits or maximum potential emissions rates, with the exception of the two coal-fired units, Units 1 and 2. Units 1 and 2 were each modeled at 1,120 pounds of SO<sub>2</sub> per hour, which equates to 26,880 pounds of SO<sub>2</sub> per 24-hour block period for each unit, for a total of 53,760 pounds of SO<sub>2</sub> per 24-hour period for the two units. Limits of 26,880 pounds per hour for Units 1 and 2 have been added to the draft permit. These limits are the equivalent of 0.519 pounds of SO<sub>2</sub> per Million Btu heat input for Unit 1 and 0.532 pounds of SO<sub>2</sub> per million Btu heat input for Unit 2 (based on maximum heat input capacity of each unit respectively). The facility will be required to demonstrate compliance with the mass based limits using their CEMS.

*Other Comment 4:*

*Some commenters stated that the Agency did have the legal authority to require a more stringent SO<sub>2</sub> limit in the permit at this time. As basis, they cited the Agency's mission statement (to protect public health), the NC Constitution (government with power derived from the people), the fact that the Agency is the Title V permitting authority responsible for enforcing air quality regulations, and one commenter indicated that the Agency's rules require more stringent limits when necessary to prevent a violation of the national ambient air quality standards.*

“The Agency has the authority to impose a numeric emission limit more stringent than the current limit. The Agency's own rules require more stringent regulations if necessary to prevent the violation of air quality standards.”

“With the data available to the Agency and the heartfelt and informed comments of all the speakers who went before me, it would be inappropriate for the Agency to wait until NC State attainment plans are prepared sometime in mid 2022.”

*Agency Response:*

With regards to the comment that stated that the Agency's own rules require more stringent regulations if necessary to prevent a violation of the NAAQS, it is presumed that this commenter was referring to a similar comment made by the Sierra Club, which was addressed in Sierra Club Comment 1 above: "The NC DAQ has relied on the narrative prohibition on pollution that causes the exceedance of air quality standards to impose more stringent numerical limits for SO<sub>2</sub> emissions than provided for in other regulatory provisions."

As indicated above, some commenters quoted the Agency's mission statement as justification for imposing a more stringent SO<sub>2</sub> limit ahead of the SIP process. While the Agency's mission includes safeguarding public health and preserving the quality of life, those objectives are implemented via the Air Quality Code. The facility is required to comply with all applicable regulations in the Code, which include meeting quantitative concentration and emission limits that are designed to protect the public health. Regarding the reference to the NC Constitution, public participation procedures are in place to ensure public involvement in the regulatory process that has resulted in the current air quality regulations that make up the Air Quality Code.

Regarding the SO<sub>2</sub> limit that is in the draft permit, please see the response to Sierra Club Comment 1 above.

*Other Comment 5:*

*High levels of SO<sub>2</sub> are dangerous to public health and the environment.*

Numerous commenters expressed concern over SO<sub>2</sub> pollution and adverse health effects associated with the pollutant.

*Agency response:*

The National Ambient Air Quality Standards (NAAQS) for SO<sub>2</sub> are determined by EPA and are required to include an adequate margin of safety to protect public health. (Information on the development of the NAAQS is available on the US EPA website: <http://www.epa.gov/ttn/naaqs/>. As stated above in our response to Sierra Club Comment 1 and in the permit review, On June 22, 2010, the EPA revised the Primary National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The new 1-hour standard is 75 parts per billion (calculated as the 99<sup>th</sup> percentile averaged over three years). Since publishing the standard, the EPA has been working with stakeholders on the implementation process. Part of this process is requiring air agencies to characterize SO<sub>2</sub> emissions for the purposes of implementing the new SO<sub>2</sub> standard, which will allow the EPA to designate which areas will be in nonattainment. The EPA proposed the *Data Requirements Rule for the 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)* on May 13, 2014. This proposed rule, which has since been

finalized, details the requirements for a state agency to provide data to the EPA so the EPA in turn can make final SO<sub>2</sub> NAAQS attainment designations. The rule includes an anticipated timeline for the attainment designation process. The air agency will be required to submit a list of applicable sources located in its jurisdiction to the EPA by January 15, 2016. For each area containing an applicable source, the air agency shall state whether it will characterize air quality through ambient air quality monitoring or through air quality modeling techniques. For areas that are characterized using a modeling analysis, it is expected that modeling will be completed and submitted to the EPA by January 2017, and that final designations for these areas will be completed by December of 2017. For areas that elect to characterize air quality through ambient monitoring, the monitors are to be operational by January 2017. Three years of data will be collected, with the EPA issuing final designations by December of 2020. State attainment plans will be due in August of 2022. The Agency, along with the North Carolina Division of Air Quality, will establish any enforceable emission limits as necessary per the process outlined above.

The Agency recognizes that SO<sub>2</sub> is an important criteria pollutant with associated health effects and is committed to implementing the 2010 standard in accordance with our regulations and the Clean Air Act as outlined above.

*Other Comment 6:*

*Require Duke Energy to install air monitoring equipment in the areas shown to be at high risk in the report that was commissioned by the Sierra Club, as well as the school complex near the plant.*

A group of homeowners in the Ballantree neighborhood in South Asheville, approximately 4 miles north of the DEP plant in Arden, submitted this comment in one letter, which was signed by 16 families. A member of one of these families also submitted oral comments at the hearing that expressed the same position. In addition to requesting that the Agency adopt the SO<sub>2</sub> limit proposed by the Sierra Club (*Sierra Club Comment 1*), they requested that the Agency require that DEP install and operate air pollution monitors in areas that the modeling study determined could violate the standard, and near the four schools near the plant. They stated that DEP should be required to submit data quarterly to the Agency, and allow periodic inspections of the equipment by a neutral third party. In the oral comments, the representative asked that these monitors be installed prior to 2017 and stressed that monitors were needed so that actual levels of SO<sub>2</sub> could be determined.

*Agency Response:*

While the Agency cannot require Duke to install monitoring equipment prior to 2017 (per the schedule in the Data Requirements Rule and the Consent Decree between EPA and the Sierra Club), if DEP were willing to do so voluntarily, the Agency would work with

them and NC DAQ to ensure that an agreement concerning siting a monitor and collecting the data in accordance with proper procedures to verify quality assurance were implemented. WNCRAQA plans to continue to work with NC and DEP to address the SO<sub>2</sub> standard as required by EPA.

The issues discussed above in our response to *Sierra Club Comment 1* are relevant here regarding the inability of the Agency to impose an SO<sub>2</sub> limit ahead of the attainment and SIP process. The installation of monitors is part of the attainment and SIP process, and the schedule for those actions is discussed above in our response to *Sierra Club Comment 1*.

#### Comments Not Related to the Air Quality Permit

*Other comments that were not related to the air permit included the following:*

- *Several commenters wanted to see the plant shut down. They are not in favor of coal, and would prefer more renewable energy including wind and solar.*
- *Several commenters mentioned Duke's poor environmental track record, including a large coal ash spill and issues with coal ash disposal and storage, ground and surface water contamination.*
- *Several commenters expressed concern about Duke as a giant corporation, their connection to and contributions to Governor McCrory's campaign and his history with the company.*
- *Commenters stated that Duke is charging customers for the cost associated with pollution control equipment, saving money by burning higher sulfur coal and not running the equipment at maximum capacity, electricity rates have increased since Duke took over, the company is making record profits.*
- *Some commenters were opposed to 'Duke project near Erwin High', a transfer station in Montford near a school.*

#### *Agency Response:*

While these are important issues for the community, they are outside the scope of WNCRAQA's review of the Title V permit. The issue of whether the control equipment is operated at the maximum capacity (mentioned in the fourth bullet) was addressed above in the Agency's response to *Sierra Club Comment 4*. The reference to the Duke project near Erwin High and the transfer station in Montford near a school appear to have been submitted to this Agency in error. There was a controversial project that involved a decision about whether to cite a transfer station near a school in Asheville that was occurring at the same time that the Agency was taking comments on the permit renewal for DEP. It appears that the commenter may have confused these issues or sent their comments to this Agency in error.

## **Memo to Air Quality Board**

### **Proposed Permit Renewal for Duke Energy Progress, Inc. – Asheville Steam Plant**

#### **Appendices**

Appendix A – Speakers at the Public Hearing on April 29, 2015

Appendix B – Written Comments Received During the Public Comment  
Period

Appendix C – Written Comments Received Electronically During the Public  
Comment Period

**Appendix A**  
**Public Hearing - Clyde A. Erwin High School, Asheville**  
**Duke Energy Progress, Inc. - April 29, 2015**

<u>Speaker</u>	<u>Affiliation</u>	<u>Order</u>
Grant Millen	Innovograph, LLC	1
Joan Walker	Mountain True	2
Richard Fireman, MD	Elders Fierce for Justice	3
Joy McConnell	Private Citizen	4
Sabrina DiCarlo	Private Citizen	5
Justin Goldstein	Congregation Beth Isreal	6
Rowdy Keelor	Health Force	7
Sydney Anderson	Mountain True	8
Cecil Bothwell	Asheville City Council	9
Mahan Siler	Elders Fierce for Justice	10
Judy Mattox	Sierra Club - Chair (WNC)	11
Jane Laping	Creation Care Alliance of WNC	12
Scott Hardin - Nieri	Creation Care Alliance of WNC	13
Benji Burrell	Private Citizen	14
Phil Bisesi	Private Citizen	15
Stephen Holsenbeck	Private Citizen	16
John Diefenback	Private Citizen	17
Bruce Clark	Private Citizen	18
Robert Lemkan	Private Citizen	19
Steve Rasmussen	Private Citizen	20
Ken Brame	Private Citizen	21
Danielle Hilton	Mom's Clean Air Force (Charlotte, NC)	22
Tom Tribble	Elisha Mitchell Audubon Society (Local Chapter)	23
Sandra Doyle	Private Citizen	24
Susan Presson	Private Citizen	25
Mark Threlkeld	Private Citizen	26
Samuel Speciale	Private Citizen	27
Robert Zieber	Private Citizen	28
Leslie Poplawski	Private Citizen	29
ViJay Kapoor	Private Citizen	30
Anne deBuys	Private Citizen	31
Timothy Birthisel	Terra Sub Aqua	32
Laura Wenzel	Medical Advocates for Health Air	33
Kelly Martin	Sierra Club	34
Margaret Yeager	Private Citizen	35
Paul Bartels	Warren Wilson College	36
Maryanne Rackoff	Private Citizen	37
Lisa-Gage Hall	Private Citizen	38
Terrence Clark, MD	Physicians for Social Responsibility	39
Tate McQueen	South Asheville CTS Community Advisory Group	40
Gail Solomon	Sierra Club	41
Cathy Holt	Green Grannies, Transition Asheville	42
Hal Hogstrom	Private Citizen	43
Steffi Rausch	Private Citizen	44
Darlene Azarmi	Democracy NC	45
Richard S. Wasch	Sierra Club - Treasurer	46
Ruth Garrison	Private Citizen	47
Jacob Garrison	Private Citizen	48
Emma Greenbaum	Private Citizen	49
Sparrel Wood	Private Citizen	50
David Reid	Private Citizen	51
Jim Barton	Private Citizen	52
Hannah Borababy	Private Citizen	53
Sylvie Horvath	Private Citizen	54

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

(Many signatures were illegible; name noted is best guess)

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Richard R. Williams (?)	private citizen	4/6/2015
Sophia V. Brooks	private citizen	4/6/2015
Lisa McWherter	private citizen	4/6/2015
Megan Schooley (?)	private citizen	4/6/2015
Lewis E. Patrie, MD	private citizen	4/6/2015
Michele Nichols	private citizen	4/6/2015
Bruce B. Clark	private citizen	4/6/2015
Gail Solomon	private citizen	4/6/2015
Eugene D. and Maryanne R. Rackoff	private citizen	4/8/2015
Tom Doebber	private citizen	4/8/2015
Paul Endry	private citizen	4/8/2015
Jan Diefenbach	private citizen	4/8/2015
Courtland White (?)	private citizen	4/8/2015
Daniel Short	private citizen	4/8/2015
Katie Bray	private citizen	4/8/2015
Susan Roderick	private citizen	4/9/2015
Joanne Lzar	private citizen	4/9/2015
Virginia Hewitt (?)	private citizen	4/9/2015
Marc Parham	private citizen	4/9/2015
Marty Steinberg	private citizen	4/9/2015
Sonia Marcus	private citizen	4/13/2015
Judy Plant	private citizen	4/13/2015
Nancy Waldrop	private citizen	4/13/2015
Allison Williams	private citizen	4/13/2015
Beth Eckl	private citizen	4/13/2015
Brandon Van Every	private citizen	4/13/2015
Nancy Boyette	private citizen	4/29/2015
Phillip Bisesi	private citizen	4/13/2015
Saul G. Speciale (?)	private citizen	4/13/2015
Robert Wells	private citizen	4/13/2015
Steve Miller	private citizen	4/13/2015
Diane Clinton	private citizen	4/22/2015
Esther B Pardue	private citizen	4/24/2015
Jane W. White	private citizen	4/24/2015
Alex & Lynn Schneider	private citizen	4/28/2015
Richard Hudspeth, MD	private citizen	4/28/2015
Anne & Vijay Kapoor	private citizen	4/28/2015
Al & Cathy Nichols	private citizen	4/28/2015
Dorothy & Matthew Manning	private citizen	4/28/2015
Ann-Marie Breen Tim McMullan	private citizen	4/28/2015
Daniel & Tricia Harris	private citizen	4/28/2015
Megan & Lee Sanders	private citizen	4/28/2015
Jim Torpey	private citizen	4/28/2015
Sally & Richard Darling	private citizen	4/28/2015
Jennifer Hosler	private citizen	4/28/2015
Bob & Patsy Pressley	private citizen	4/28/2015
Russell & Carla Mitchell	private citizen	4/28/2015
Michael Mueller	private citizen	4/28/2015
Lynn Eddy & Don Dessler	private citizen	4/28/2015

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Heidi & Corey Atkins	private citizen	4/28/2015

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Esther Manheimer	Mayor of Asheville	5/1/2015
Hannah Wood	private citizen	5/7/2015
Phillip Bisesi	private citizen	4/29/2015
Audrey Miller	private citizen	4/29/2015
Ashley Edwards	private citizen	4/29/2015
Barbara Sloan (?)	private citizen	4/29/2015
Steve Rasmussen	private citizen	4/29/2015
Dixie Deerman	private citizen	4/29/2015
Daniel Short	private citizen	4/29/2015
Anne Craig	private citizen	4/29/2015
anonymous	private citizen	4/29/2015
anonymous	private citizen	4/29/2015
John Diefenbach	private citizen	4/29/2015
Anne deBuys	private citizen	4/29/2015
Laura Wenzel	Medical Advocates for Clean Air	4/29/2015
Fred & Alice Stanback, Jr	Medical Advocates for Clean Air	4/29/2015
William Blackley, MD	Medical Advocates for Clean Air	4/29/2015
Aaron Levy, MD	Medical Advocates for Clean Air	4/29/2015
Jennifer Mullendore, MD, MSPH	Medical Advocates for Clean Air	4/29/2015
Libby & Dave Cable	Medical Advocates for Clean Air	4/29/2015
Kim Gaetz	Medical Advocates for Clean Air	4/29/2015
Janis Hammett	Medical Advocates for Clean Air	4/29/2015
Lisa Johnson	Medical Advocates for Clean Air	4/29/2015
James Kenny	Medical Advocates for Clean Air	4/29/2015
Jane & John Pasquini	Medical Advocates for Clean Air	4/29/2015
Jonathan Kotch	Medical Advocates for Clean Air	4/29/2015
Fran Bronanader, RN	Medical Advocates for Clean Air	4/29/2015
Karen Mosteller	Medical Advocates for Clean Air	4/29/2015
Mackenzie Purser	Medical Advocates for Clean Air	4/29/2015
Mahan Siler	private citizen	4/29/2015
Sabrina DiCarlo	private citizen	4/29/2015
Richard Fireman, MD	private citizen	4/29/2015
Scott Hardin-Nieri	private citizen	4/29/2015
anonymous	private citizen	4/29/2015
Bailey Bridgett	private citizen	4/30/2015
Erin Thomas	private citizen	4/30/2015
Ember Garcia	private citizen	4/30/2015
Shaylyn Glaze	private citizen	4/30/2015
Karen Greene	private citizen	4/30/2015
Samantha Griffin	private citizen	4/30/2015
Loretta Gage	private citizen	4/30/2015
Journie Howard	private citizen	4/30/2015
Chelsey Jones	private citizen	4/30/2015
MacKenzie Lusk	private citizen	4/30/2015
Jasmine Malone	private citizen	4/30/2015
Michael Murray	private citizen	4/30/2015
Eric Prielo	private citizen	4/30/2015
Victor Quiruzicazo	private citizen	4/30/2015
Jake Stevens	private citizen	4/30/2015
Julia Willett	private citizen	4/30/2015
Yufer Allen	private citizen	4/30/2015

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Shakayla Allen-Morgan	private citizen	4/30/2015
Sydney Blair	private citizen	4/30/2015
Jacob Boyd	private citizen	4/30/2015
Sierra Breisacher	private citizen	4/30/2015
Sarena Burrel	private citizen	4/30/2015
Emilee Crenshaw	private citizen	4/30/2015
Skyler Hall	private citizen	4/30/2015
Nick Jones	private citizen	4/30/2015
Megan Kennedy	private citizen	4/30/2015
Josy McKeown	private citizen	4/30/2015
Jessica Beatriz Miller	private citizen	4/30/2015
Tyler Richardson	private citizen	4/30/2015
Tabitha Roberts	private citizen	4/30/2015
Savannah Shuey	private citizen	4/30/2015
Kathleen Upraise	private citizen	4/30/2015
Jim Surrect	private citizen	4/30/2015
Aarion Talbert	private citizen	4/30/2015
Caleb Allison	private citizen	4/30/2015
Savannah Baker	private citizen	4/30/2015
Isaial Carver (?)	private citizen	4/30/2015
Alex Chmonevich (?)	private citizen	4/30/2015
Christien Dockery	private citizen	4/30/2015
Ana Perez-Antonio	private citizen	4/30/2015
Jose Prielo-Limaes (?)	private citizen	4/30/2015
Justin Quintero	private citizen	4/30/2015
Arianna Robinson	private citizen	4/30/2015
Samantha Rojas	private citizen	4/30/2015
Angel Salto	private citizen	4/30/2015
Daniel Sannor	private citizen	4/30/2015
Maecy Scott	private citizen	4/30/2015
Olga Shostake	private citizen	4/30/2015
Tim Tishchenko	private citizen	4/30/2015
Liliya Trach	private citizen	4/30/2015
Tim Veselovskie	private citizen	4/30/2015
Ashlyn Wolfe	private citizen	4/30/2015
Sarah Wood	private citizen	4/30/2015
Haylee Wyatt	private citizen	4/30/2015
McKinzey Robertson	private citizen	4/30/2015
Jordon Holbert	private citizen	4/30/2015
Nijia Allen	private citizen	4/30/2015
Brookel Keenerloft	private citizen	4/30/2015
Rhiannon Cole	private citizen	4/30/2015
Maya Conley	private citizen	4/30/2015
Tyler Cummings	private citizen	4/30/2015
Addison Goode	private citizen	4/30/2015
Haley Hensley	private citizen	4/30/2015
Diana I Linykn	private citizen	4/30/2015
Lochlan MacQueen	private citizen	4/30/2015
Margaret	private citizen	4/30/2015
Jeremy Warren	private citizen	4/30/2015
Faith Ward	private citizen	4/30/2015

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Johnathan Uribez	private citizen	4/30/2015
Derrick Thornton	private citizen	4/30/2015
Anthony Simuel	private citizen	4/30/2015
Jazlyn Perez	private citizen	4/30/2015
Stephen Kuykendall	private citizen	4/30/2015
Mateo Martinez	private citizen	4/30/2015
Edgar Garcia P	private citizen	4/30/2015
Imani Woods	private citizen	4/30/2015
Noah Heflin	private citizen	4/30/2015
Tamera Surrent	private citizen	4/30/2015
Ashley Sleepe	private citizen	4/30/2015
Michael McConnell	private citizen	4/30/2015
Karen Ramirez Perez	private citizen	4/30/2015
Jordan Benett	private citizen	4/30/2015
Dylon Chavers	private citizen	4/30/2015
Marcia Arellano	private citizen	4/30/2015
Haily Brady	private citizen	4/30/2015
Olivia Cojacara	private citizen	4/30/2015
Daniel Garcia	private citizen	4/30/2015
Brodee Hyder	private citizen	4/30/2015
Marcyah Davidson	private citizen	4/30/2015
Sam Warren	private citizen	4/30/2015
Ki Dean Lindsey	private citizen	4/30/2015
Alexis Hunter	private citizen	4/30/2015
Maisey Wells	private citizen	4/30/2015
Jordan Fore	private citizen	4/30/2015
Rachel Horn	private citizen	4/30/2015
Yasmin Maldonado	private citizen	4/30/2015
Gabriella Peters	private citizen	4/30/2015
Emily Redmon	private citizen	4/30/2015
Mary McGrain	private citizen	4/30/2015
Dylan Russell	private citizen	4/30/2015
Samantha Marino	private citizen	4/30/2015
Britny Ortiz	private citizen	4/30/2015
Jenny Sanchez	private citizen	4/30/2015
Kody Jones	private citizen	4/30/2015
Johnathan Worley	private citizen	4/30/2015
Kasey Kidwell	private citizen	4/30/2015
Alex Cojocari	private citizen	4/30/2015
Lexi Gieydora	private citizen	4/30/2015
Nick Gellam	private citizen	4/30/2015
Bradley Cole	private citizen	4/30/2015
Mark Masangkay	private citizen	4/30/2015
Bre Stout	private citizen	4/30/2015
Jazmin Baqui	private citizen	4/30/2015
Matthew Gaddy	private citizen	4/30/2015
Anna Alexseyenko	private citizen	4/30/2015
Jacqueline Mestanza	private citizen	4/30/2015
Kaneco Penlor	private citizen	4/30/2015
Chance Bryant	private citizen	4/30/2015
Maria Pena	private citizen	4/30/2015

**Appendix B**  
**Written Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing**

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Samantha Marino	private citizen	4/30/2015
Shelbie Miller	private citizen	4/30/2015
Debby Short	private citizen	4/30/2015
Caitlin Taylor	private citizen	4/30/2015
Madison Scruggs	private citizen	4/30/2015
Charlstyn Case	private citizen	4/30/2015
Scott Amaranto	private citizen	4/30/2015
Cameron Quinley	private citizen	4/30/2015
Kirstin Gosneu	private citizen	4/30/2015
Samantha C.	private citizen	4/30/2015
Kaitlyn Evans	private citizen	4/30/2015
Benjamin Faford	private citizen	4/30/2015
Garrett Fedoch	private citizen	4/30/2015
Cristina Felipe	private citizen	4/30/2015
Jordon Freemon	private citizen	4/30/2015
Henry Ramero	private citizen	4/30/2015
Vadim Koroldi	private citizen	4/30/2015
Michael Izak Vanzant Chavez	private citizen	4/30/2015
Roman Egli	private citizen	4/30/2015
Kelsie Hughes	private citizen	4/30/2015
Kaylyn Moore	private citizen	4/30/2015
Carrie Speigh	private citizen	4/30/2015
Jade Dickson	private citizen	4/30/2015
Wesley Cisco	private citizen	4/30/2015
Diego Barisa	private citizen	4/30/2015
Alize Moffitt	private citizen	4/30/2015
Selena Moore	private citizen	4/30/2015
Logan Mellismo	private citizen	4/30/2015
Kelsey Owenby	private citizen	4/30/2015
Calcin Nikolas	private citizen	4/30/2015
Ruimikorolcuck	private citizen	4/30/2015
Blaze Biddix	private citizen	4/30/2015
Michelle David	private citizen	4/30/2015
Isaac Woods	private citizen	4/30/2015
Jason Fox	private citizen	4/30/2015
Stephen Ketterman	private citizen	4/30/2015
Christain Moyrow	private citizen	4/30/2015
Morgon Cote	private citizen	4/30/2015

## Appendix C

### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

(Email address listed when name was not signed)

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Bridget M. Lee	Sierra Club	4/30/2015
Elaine Robbins	private citizen	3/31/2015
Betty Lawrence	private citizen	3/31/2015
C.A. Arneson	private citizen	3/31/2015
David Williams	private citizen	3/31/2015
Sandra Diaz	private citizen	3/31/2015
Wilbert & Gloria Griffith	private citizen	3/31/2015
Cortney Nicole Lance	private citizen	3/31/2015
Madison Dossey	private citizen	3/31/2015
Annette Hudson	private citizen	4/1/2015
Susan McBride	private citizen	4/1/2015
Elizabeth Porter	private citizen	4/1/2015
John Baker	private citizen	4/1/2015
Moni Hill	private citizen	4/1/2015
Joan Walker	private citizen	4/1/2015
Sydney Anderson	private citizen	4/1/2015
Abigail West	private citizen	4/1/2015
Rachel Stein	private citizen	4/1/2015
James Goodall	private citizen	4/1/2015
Haley Garritano	private citizen	4/1/2015
Larisa Karr	private citizen	4/1/2015
Shelly Jahnke	private citizen	4/2/2015
Joshua Smith	private citizen	4/2/2015
Doug Franklin	private citizen	4/2/2015
Jerad Crave	private citizen	4/2/2015
Hartwell Carson	private citizen	4/3/2015
Rachel Stevens	private citizen	4/3/2015
Jess Laggis	private citizen	4/3/2015
Adam Lauver	private citizen	4/4/2015
Larry Goding	private citizen	4/4/2015
Anders Johnson	private citizen	4/4/2015
Denise Carbonell	private citizen	4/5/2015
Jonathon Stecker	private citizen	4/6/2015
Mandy Giles	private citizen	4/6/2015
Leslie Parmenter	private citizen	4/6/2015
Lisa-Gaye Hall	private citizen	4/6/2015
Amy Ethridge	private citizen	4/6/2015
Melissa Williams	private citizen	4/6/2015
Bella Smiga	private citizen	4/6/2015
Cynthia Camilleri	private citizen	4/6/2015
Thomas O'Shea	private citizen	4/6/2015
Peter Roe	private citizen	4/6/2015
Anna Alsobrook	private citizen	4/6/2015
Jody Flemming	private citizen	4/6/2015
Kelly Cowan	private citizen	4/6/2015
Elaine Robbins	private citizen	4/6/2015
William McKelder	private citizen	4/6/2015
Brandon Dana	private citizen	4/6/2015
Beth Chalmers	private citizen	4/6/2015

## Appendix C

### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Sam Hollis	private citizen	4/6/2015
Robert Wootten	private citizen	4/6/2015

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### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Elizabeth M. Love	private citizen	4/6/2015
Becca Lane	private citizen	4/6/2015
Katie Kelley	private citizen	4/6/2015
J. Cantrell	private citizen	4/6/2015
Connie Downey	private citizen	4/6/2015
Bri Ambrosic	private citizen	4/6/2015
Chris Coney	private citizen	4/6/2015
Lindsey Weed	private citizen	4/7/2015
Peter Krull	private citizen	4/7/2015
Nick Nicholson	private citizen	4/7/2015
Danna McIntock	private citizen	4/7/2015
Todd Lee	private citizen	4/7/2015
Charla Groves	private citizen	4/7/2015
Kelly Picarsic	private citizen	4/7/2015
Hilary Chiz	private citizen	4/7/2015
Della Williams	private citizen	4/7/2015
Rowdy Keelor	private citizen	4/7/2015
Bryan Mitchell	private citizen	4/7/2015
Bill Carpenter	private citizen	4/7/2015
Gary Van Doren	private citizen	4/7/2015
Carolyn Baker	private citizen	4/7/2015
Lela Winton	private citizen	4/7/2015
Nina Hart	private citizen	4/7/2015
Ernest Boyd	private citizen	4/7/2015
Will Harlan	private citizen	4/7/2015
Diana Richards	private citizen	4/7/2015
Carol Swing	private citizen	4/7/2015
Sara Alford	private citizen	4/7/2015
Pamela Harden	private citizen	4/7/2015
John Grup III	private citizen	4/7/2015
Julia Harold	private citizen	4/7/2015
Becky Ellis	private citizen	4/7/2015
Julie Larsh	private citizen	4/7/2015
Christina Morrison	private citizen	4/7/2015
Heather Roberts-VanSickle	private citizen	4/7/2015
Janet Black, RN, FNP, MSN, MPH	private citizen	4/7/2015
John Qualey	private citizen	4/7/2015
Richard Purdy	private citizen	4/7/2015
Melita Kyriakou	private citizen	4/7/2015
Connor Whaley	private citizen	4/7/2015
Barbara Hodik	private citizen	4/7/2015
Bruce Clarke	private citizen	4/7/2015
Anthony Dezio	private citizen	4/7/2015
Bernie McGlinchey	private citizen	4/7/2015
Joel Marchesoni	private citizen	4/7/2015
Barbara Sloss	private citizen	4/7/2015
Terri Lefler	private citizen	4/7/2015
Carole Schaefer	private citizen	4/7/2015
Jay Marlow	private citizen	4/7/2015
Eva Harwood	private citizen	4/7/2015
Cheri Henderson	private citizen	4/7/2015

## Appendix C

### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Victoria Nichols	private citizen	4/7/2015
Keith Viglietta	private citizen	4/7/2015
Randal Pride	private citizen	4/7/2015
Alicia Kenerley	private citizen	4/7/2015
Jude Maglione	private citizen	4/7/2015
Moni Hill	private citizen	4/7/2015
Eva Wilson	private citizen	4/7/2015
Heather Norton	private citizen	4/7/2015
Tania Malven	private citizen	4/7/2015
Jonathan Gach	private citizen	4/7/2015
Jacob Garrson	private citizen	4/7/2015
Susan Flynt	private citizen	4/7/2015
Dan Clere	private citizen	4/7/2015
Andrew Schober	private citizen	4/7/2015
Nicole Mohrmann	private citizen	4/7/2015
Susan Oehler	private citizen	4/7/2015
Molly Arn	private citizen	4/8/2015
Nicole Mohrmann	private citizen	4/8/2015
Melanie Thomas	private citizen	4/8/2015
Eric Sootin	private citizen	4/8/2015
John Webb	private citizen	4/8/2015
Brian M.	private citizen	4/8/2015
Patrick McMahon	private citizen	4/8/2015
Forrest Merithew	private citizen	4/8/2015
Terese Christian	private citizen	4/8/2015
Stewart G. Roth	private citizen	4/8/2015
Allison Grainger	private citizen	4/8/2015
Betty Lawrence	private citizen	4/8/2015
Eva Westheimer	private citizen	4/8/2015
Gabriel Dunsmith	private citizen	4/8/2015
Victor McHenry	private citizen	4/8/2015
Susan Presson	private citizen	4/8/2015
Linda Alfredson	private citizen	4/8/2015
Mark Remick	private citizen	4/9/2015
Jason Kimmel	private citizen	4/9/2015
Margaret Bruder	private citizen	4/9/2015
Andy Campbell	private citizen	4/9/2015
Olga Pader	private citizen	4/9/2015
Thomas H. Jerdee	private citizen	4/9/2015
Jana Green	private citizen	4/9/2015
Freelin Jones	private citizen	4/10/2015
Ashleigh Hillen	private citizen	4/10/2015
Monica Embrey	private citizen	4/10/2015
Rachel Larson	private citizen	4/10/2015
Dylan Hulme	private citizen	4/10/2015
Luis Barrios	private citizen	4/11/2015
Kristen Allen	private citizen	4/11/2015
M. Lemell	private citizen	4/11/2015
Matthew Shea	private citizen	4/11/2015
Charles Froelich	private citizen	4/12/2015
James Coleman, MD	private citizen	4/12/2015

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### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Meg Coleman, FNP	private citizen	4/12/2015
Bob Wagner	private citizen	4/12/2015
Bob Wagner	private citizen	4/12/2015
Kelly Picarsic	private citizen	4/13/2015
Miles Kelley	private citizen	4/13/2015
Hannah Wood	private citizen	4/13/2015
Anne Hamilton	private citizen	4/13/2015
George Garrett	private citizen	4/13/2015
Jessica Krause	private citizen	4/13/2015
Susan Cheney	private citizen	4/13/2015
Thomas O'Shea	private citizen	4/14/2015
Meghan Ibach	private citizen	4/14/2015
William Perkins	private citizen	4/15/2015
Jason Rector	private citizen	4/15/2015
jodi.sanderson@gmail.com	private citizen	4/15/2015
jodieblonde1947@yahoo.com	private citizen	4/15/2015
catfreak0307@gmail.com	private citizen	4/15/2015
milesav@earthlink.net	private citizen	4/15/2015
msaklea@gmail.com	private citizen	4/15/2015
charles50@bellsouth.net	private citizen	4/15/2015
mia@comfortsoap.com	private citizen	4/15/2015
Jason Allison	private citizen	4/15/2015
cathy.nieman@gmail.com	private citizen	4/15/2015
jbunch@us.ibm.com	private citizen	4/15/2015
Diane DeWitt	private citizen	4/15/2015
yatescp2002@yahoo.com	private citizen	4/15/2015
elizabeth.culpepper@gmail.com	private citizen	4/15/2015
csg221@triad.rr.com	private citizen	4/15/2015
arianagrace99@gmail.com	private citizen	4/15/2015
blullmer@live.com	private citizen	4/15/2015
wagoner.donna@gmail.com	private citizen	4/15/2015
amd57432@yahoo.com	private citizen	4/15/2015
fsk844@hotmail.com	private citizen	4/15/2015
mariagrueda@att.net	private citizen	4/15/2015
tapcitymama@gmail.com	private citizen	4/15/2015
portostefono@gmail.com	private citizen	4/15/2015
Kelly Hollinger	private citizen	4/15/2015
myrachael@yahoo.com	private citizen	4/15/2015
catslc@aol.com	private citizen	4/15/2015
canopy10@morrisbb.net	private citizen	4/15/2015
sammiller525@yahoo.com	private citizen	4/15/2015
benobridgers@gmail.com	private citizen	4/15/2015
milesductcleaning@gmail.com	private citizen	4/15/2015
ziggybug@ec.rr.com	private citizen	4/15/2015
ellyrvilca@yahoo.com	private citizen	4/15/2015
bobbystr291@gmail.com	private citizen	4/15/2015
zmpackman@att.net	private citizen	4/15/2015
gregaustin@mindspring.com	private citizen	4/15/2015
edison2862@peoplepc.com	private citizen	4/15/2015
mommom104@gmail.com	private citizen	4/15/2015
speriano@me.com	private citizen	4/15/2015

## Appendix C

### Email Comments Received in Relation to the Duke Energy Progress, Inc. Public Hearing

<u>Name</u>	<u>Affiliation</u>	<u>Date Received</u>
Gregory Frederick	private citizen	4/15/2015
applegarth@skybest.com	private citizen	4/15/2015
macw@nc.rr.com	private citizen	4/15/2015
gwcheney@ymail.com	private citizen	4/15/2015
krichesk@gmail.com	private citizen	4/15/2015
ansmoker@gmail.com	private citizen	4/15/2015
tcpatton@mindspring.com	private citizen	4/15/2015
kentg48@yahoo.com	private citizen	4/15/2015
dysicotte@yahoo.com	private citizen	4/15/2015
dwgehrman@yahoo.com	private citizen	4/15/2015
mkward@uncg.edu	private citizen	4/15/2015
karen@karenrivers.info	private citizen	4/15/2015
gllamson@gmail.com	private citizen	4/15/2015
Hannah Borababy	private citizen	4/15/2015
Ms. Cockman	private citizen	4/15/2015
pandrew317@yahoo.com	private citizen	4/15/2015
mspann10@gmail.com	private citizen	4/15/2015
H. M. Felder	private citizen	4/16/2015
pouchay@bellsouth.net	private citizen	4/15/2015
srhochstetler@kastanet.org	private citizen	4/15/2015
veracrumley@att.net	private citizen	4/15/2015
ahhh2b1@gmail.com	private citizen	4/15/2015
sporter2623@yahoo.com	private citizen	4/15/2015
nikki_delcastillo@yahoo.com	private citizen	4/15/2015
stysonrn@yahoo.com	private citizen	4/15/2015
mspruell@mi-connection.com	private citizen	4/15/2015
chriskinkade@hotmail.com	private citizen	4/15/2015
John Sterling	private citizen	4/15/2015
seandamrel@gmail.com	private citizen	4/15/2015
eohare2@att.net	private citizen	4/15/2015
ttetzlaf@uncc.edu	private citizen	4/15/2015
laynemcdaniel@hotmail.com	private citizen	4/15/2015
sbwinter1@bellsouth.net	private citizen	4/15/2015
butterfingershrb@yahoo.com	private citizen	4/16/2015
ssexner1124@att.net	private citizen	4/16/2015
raptured_night18@yahoo.com	private citizen	4/16/2015
morenopd@munimadrid.es	private citizen	4/16/2015