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February 6, 2018

Mr. William Wehrum
Assistant Administrator, Office of Air and Radiation
U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code: 28221T
1200 Pennsylvania Avenue, NW.,
Washington, DC 20460

Subject: Docket ID No. EPA-HQ-OAR-2017-0545; Request for Extension to Submit Comments Beyond February 26, 2018 Deadline; State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units; Advanced Notice of Proposed Rulemaking

Dear Assistant Administrator Wehrum:

On December 28, 2017, the U.S. Environmental Protection Agency (EPA) issued an Advance Notice of Proposed Rulemaking (ANPRM), State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units.¹ The North Carolina Department of Environmental Quality – Division Air Quality (DAQ) is requesting at least a 60-day extension of the comment period, until April 27, 2018 to allow sufficient time to conduct an adequate review of the large volume of supporting material contained within the ANPRM.

The DAQ requests the extension for several reasons. The comment period for the Clean Power Plan (CPP) proposed repeal has been extended until April 26, 2018 to provide time for three additional public listening sessions.² Extending the ANPRM comment deadline allows for alignment with the CPP Repeal comment period, giving interested parties adequate time to focus on each proposal fully, but separately. As both EPA actions are interrelated, the additional time will give interested parties the time needed to evaluate policy, legal and technical components of the ANPRM.

To aid in generating comments, EPA has identified 41 supporting documents in the docket that stakeholders are asked to review.³ EPA is not giving stakeholders adequate time to evaluate these documents, some of which are lengthy and technically complex. We have also noticed that

¹ 82 FR 61507 – 61519.

² <https://www.epa.gov/stationary-sources-air-pollution/public-hearing-repealing-clean-power-plan>.

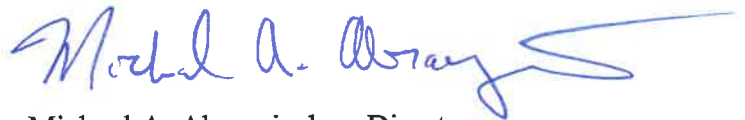
³ <https://www.regulations.gov/docket?D=EPA-HQ-OAR-2017-0545>.

the following documents were listed on the docket but were not provided by the link in the docket (as of February 5, 2018).

- #7 - Energy Efficiency for Power Plant Auxiliaries V2 0
- #9 - Coal-Fired Power Plant Heat Rate Improvement Options, Part 2
- #11 -Alstom - 3-31-2011
- #12 - EPA-HQ-OAR-2013-0602-22767 Supp _33
- #17 - Coal-Fired Power Plant Heat Rate Improvement Options, Part 1
- #19 - EPRI – Range of Applicability of Heat Rate Improvements
- #23 - IEA (Reid) - Retrofitting Lignite Plants to Improve Efficiency and Performance
- #24 - RFF-DP-13-05
- #27 - Steam Turbine Upgrading Low-hanging Fruit
- #32 - IEA (Henderson) – Upgrading and Efficiency Improvement in Coal-fired Power Plants
- #33 - Regulating Greenhouse Gas Emissions From Existing Sources...
- #37 - Dry Sorbent Injection for SOx Emissions Control - Power Engineering International
- #40 - NRDC Pollution Standards Report

Our agency is working diligently to review both of EPA’s proposals and how any policy developed from these two actions would affect North Carolina’s fleet of existing coal plants, the economy, and the environment. An extension of 60 days would allow agencies and other interested parties to develop both comments and potential strategies that guide EPA’s effort to craft a rule that is legally defensible, technically achievable, and with lower risks and costs while maintaining the emissions reductions provided by the CPP.

Sincerely,



Michael A. Abraczinskas, Director
Division of Air Quality, NCDAQ

MAA/ssm

cc: Sheila Holman, NCDEQ
Sushma Masemore, NCDAQ
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