



## North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue  
Governor

Dee Freeman  
Secretary

February 29, 2012

Gwendolyn Keyes Fleming  
Regional Administrator  
USEPA, Region 4  
Sam Nunn Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

Dear Ms. Fleming:

Pursuant to the requirements of the federal Clean Air Act and on behalf of Governor Beverly E. Perdue, I am submitting to you and your colleagues at the U.S. Environmental Protection Agency (EPA) the State of North Carolina's amended recommendations concerning the nonattainment boundary within the Charlotte-Gastonia-Salisbury area for the 2008 8-hour ozone standard. We are recommending the boundaries which are described in the enclosed package because we believe that they are the most effective way to achieve the goals of cleaner air, healthier lives, a stronger economy, and more effective conservation of our land and water. We look forward to discussing these recommendations with you after EPA has had the opportunity to review and comment on them.

The federal Clean Air Act requires EPA to designate areas as attainment or nonattainment following promulgation of a new national ambient air quality standard, such as the 2008 8-hour standard for ozone. North Carolina learned of the need to update the boundary recommendations, due October 28, 2011, on September 29, 2011 during a call with EPA Region 4 staff. Therefore, sufficient time to consult with the local elected officials and other partners was not available prior to the submittal. North Carolina reserved the right to further amend these recommendations based on subsequent dialogue with our partners and analysis of the current data. Based on our previous extensive public discussions for our initial boundary recommendations for the 2008 ozone standard submitted in March 2009, and our analysis of the current ambient air quality data through 2011, we initially recommended the 1997 8-hour ozone nonattainment boundary for the Charlotte-Gastonia-Salisbury metropolitan area be designated as nonattainment for the 2008 8-hour ozone standard and all remaining areas be designated as attainment.

On December 8, 2011, the EPA notified Governor Perdue that they intend to support North Carolina's recommended designation and boundary for the Charlotte-Gastonia-Salisbury area. The EPA also stated that they would work with the State concerning what the appropriate boundary for this area should be. This letter started the 120-day process by which the EPA plans to designate areas as nonattainment. The EPA also indicated in this letter that if North Carolina has additional information that we want EPA to consider it should be submitted by February 29, 2012.

The North Carolina amended recommendation is for all of Mecklenburg County and portions of Cabarrus, Gaston, Iredell, Lincoln, Rowan and Union in the Charlotte-Gastonia-Salisbury metropolitan area be designated as nonattainment for the 2008 8-hour ozone standard and that all remaining areas in the State be designated as attainment.

North Carolina believes that a smaller area than the nonattainment boundary for the 1997 8-hour ozone standard is appropriate for the Charlotte-Gastonia-Salisbury metropolitan area. At the time areas were designated nonattainment for the 1997 8-hour ozone standard, all of the monitors were violating the standard in the Charlotte-Gastonia-Salisbury area as well as many of the urban areas across the state. A larger nonattainment boundary was needed and proved sufficient to meet the 1997 standard. With the 2008 ozone standard, the Charlotte-Gastonia-Salisbury area is the only area in the state violating the standard and not all of the monitors in this area are in violation. North Carolina has carefully examined the area and determined that a number of townships with rural characteristics with little to no emission sources should be designated attainment.

Ozone pollution is an air quality issue in North Carolina that we are working hard in conjunction with our many local, state, and national partners to solve. Over the past decade North Carolina has implemented substantial, progressive emissions reductions that have resulted in all areas within the state attaining the 1997 8-hour ozone standard. Under the North Carolina legislature's Clean Air Bill of 1999, the State's vehicle inspection and maintenance program was changed to an on-board diagnostic (OBD) program which now covers 48 counties. In addition to implementation of the NOx SIP Call rules, in 2002 North Carolina's General Assembly also enacted the landmark multi-pollutant legislation known as the Clean Smokestacks Act which continues to result in significant sulfur dioxide and nitrogen oxides (NOx) emissions reductions from the State's two largest electric utility companies. As demonstrated by these and other actions, North Carolina is committed to improving air quality.

North Carolina is committed to protecting the health of our citizens, our environment, and our economy. Solving our ozone and other air quality concerns is critical to achieving those goals. Improving air quality is vital to the health of our citizens, our future growth, prosperity and quality of life. We look forward to continuing to work with EPA and all of our other partners on the challenging tasks ahead to establish appropriate boundaries for the Charlotte-Gastonia-Salisbury nonattainment area and to develop strategies to attain the 2008 8-hour ozone standard. More detailed information and supporting data are included in the enclosed amended recommendation package. Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink that reads "Dee Freeman". The signature is written in a cursive, flowing style.

Dee Freeman

DF:lab

Enclosure

cc: The Honorable Beverly E. Perdue  
The Honorable Steve Troxler  
The Honorable Gene Conti  
The Honorable J. Keith Crisco  
Sheila C. Holman