



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue, Governor

Dee Freeman, Secretary

October 28, 2011

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 revised recommendations for boundaries delineating the areas in the State that either attain or do not attain the March 12, 2008 8-hour standard for ozone. We believe the boundaries described in the enclosed package are the most effective way to achieve the goals of the Clean Air Act. 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. The EPA has asked states for their recommendations for nonattainment boundaries by October 28, 2011. Please note that North Carolina plans to certify its 2011 ambient air quality data for ozone by the end of 2011 so that this data may be used in determining nonattainment boundaries for the March 12, 2008 8-hour standard for ozone.

Based on extensive public discussion of our initial boundary recommendations for the 2008 ozone standard submitted in March 2009 and analysis of the current ambient air quality data through 2011, we are recommending that six entire counties and one partial county in 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. The proposed nonattainment area is consistent with the area that was designated nonattainment for the 1997 8-hour ozone standard. North Carolina was able to attain the 1997 8-hour ozone standard using this recommended nonattainment boundary area.

North Carolina learned of the need to update the boundary recommendations in a call with EPA Region 4 staff on September 29, 2011. As a result, the state has not had sufficient time to consult with local elected officials and other partners prior to this submittal. North Carolina reserves the right to further amend these recommendations as we have the opportunity to do that over the

coming weeks. Any changes in the state's recommendations will be communicated during the 120 day process that will follow EPA's response to these initial recommendations.

North Carolina has been working hard to address ozone pollution in conjunction with our many local, state, and national partners. Over the past decade, North Carolina has implemented substantial, progressive emissions reductions that have resulted in attainment of the 1997 8-hour ozone standard statewide. 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 that 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 believes that good air quality is vital to the health of our citizens, the state's environment, and future economic growth and quality of life. We look forward to continuing to work with EPA and our other partners to develop strategies to attain the 2008 8-hour ozone standard. More detailed information and supporting data are included in the enclosed recommendation package. Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Dee Freeman", written in a cursive style.

Dee Freeman  
Secretary

DF:lab

Enclosure

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