

**ENVIRONMENTAL MANAGEMENT COMMISSION
AIR QUALITY COMMITTEE MEETING SUMMARY**

July 8, 2015

Archdale Building-Ground Floor Hearing Room

10:30 – 12:00 AM

The Air Quality Committee (AQC) of the Environmental Management Commission (EMC) met on July 8, 2015, in the Ground Floor Hearing Room of the Archdale Building. The AQC members in attendance were: Mr. Charlie Carter, Chairman, Mr. Gerald Carroll, Dr. Lawrence Raymond, Mr. E.O. Ferrell, Mr. J.D. Solomon, and Ms. Julie Wilsey. Mr. Steve Tedder, Mr. Bill Puette, the Director and staff members of the Division of Air Quality (DAQ), Ms. Jennie Hauser of the North Carolina Attorney General's Office and the general public was also in attendance.

CALL TO ORDER (Charlie Carter)

Agenda Item #1, Call to Order and the State Government Ethics Act, N.C.G.S. §138A-15(e) General Statute §138A-15(e) mandates that the Chairman inquire as to whether any member knows of any known conflict of interest or appearance of conflict with respect to matters before the Environmental Management Commission's Air Quality Committee. No conflicts were identified.

MINUTES (Charlie Carter)

Agenda Item #2, Review and Approval of May Meeting Minutes

Chairman Carter asked if everyone had been able to read the minutes from the May meeting and if they had any changes. Ms. Wilsey noted that her name was misspelled at the bottom of page 3 of the meeting minutes. Chairman Carter thanked Ms. Wilsey for the correction and entertained a motion to approve the May meeting minutes as amended. Mr. Ferrell made a motion to approve the minutes and Ms. Wilsey seconded. The motion to approve the minutes was unanimously approved.

CONCEPTS

Agenda Item #3, Clean Air Act Section 111(d) Emissions Guidelines for Greenhouse Gas Emissions from Existing Electric Generating Units (EGUs) (531) (Joelle Burleson, DAQ)

Ms. Burleson said the concept she will be presenting is on a new rule proposed by the U.S. Environmental Protection Agency (EPA) under Clean Air Act (CAA) Section 111(d) titled the Emissions Guidelines for Greenhouse Gas Emissions from Existing Electric Generating Units (EGUs). The reason for the action is to implement the CAA Section 111(d) guidelines for existing EGUs which EPA has proposed as 40 CFR 60 Subpart UUUU Emission Guidelines for Greenhouse Gas (GHG) Emissions and Compliance Times.

Ms. Burleson said that EPA proposed these emissions guidelines for EGU GHG emissions on June 2, 2014. The guidelines are also referred to as the 111(d) or Clean Power Plan for existing

power plants. EPA is expected to release the final guidelines in late summer 2015. She explained that Section 111(d) requires EPA to identify the “best system of emission reduction” (BSER) that is adequately demonstrated and available to limit pollution and to set guidelines for all 50 states to reflect BSER in their rules. Based on its evaluation of BSER for existing EGUs, the EPA proposed regulation provides state specific goals for reducing carbon dioxide (CO₂) emissions for the power sector. States would then be required to develop a plan including necessary rules to meet those goals. The proposed rule includes interim goals to be met over the period 2020-2029 and a final goal to be met by 2030.

Ms. Burlison stated that the proposed EPA rules require each state to develop and submit a state compliance plan to meet the goals within 1 year, or an initial compliance plan within 1 year with a request for a 1 year (single state plan) or 2 year (multi state plan) extension. A new Section of rules for North Carolina would need to be adopted to address the 111 (d) requirements. Other existing rules may also need to be revised. These amendments are being proposed in response to future federal requirements.

Discussion:

Chairman Carter said the final EGU GHG rule is expected to be released by EPA in August 2015. Along with the proposed rule EPA plans to propose a companion federal implementation plan, or FIP, which is EPA’s backup if a state fails to submit its own plan. The EPA rule will invoke a complex, massive rulemaking effort by North Carolina and the other states, and that some people question whether the EPA has the authority to develop such a rule.

Dr. Raymond commented that in addition to GHG emission reductions from the Clean Power Plan rule, there will be other health effects benefits from an expected reduction in respiratory diseases and related hospital admissions. These related air quality co-benefits would stem from emission reductions of sulfur dioxide (SO₂), nitrogen oxides (NO_x), mercury and fine particulate matter (PM) that current evidence suggests will result from carbon emissions reductions. He said he believes there is opportunity to build on improvements in health outcomes that occurred in first decade of this century such as decreases in death rates, asthma, pneumonia, and emphysema and encouraged staff to look at opportunity for more strict carbon emission rather than a fenceline only approach. Dr. Raymond also asked whether there would be stakeholder meetings in the plan development.

Chairman Carter noted that he anticipates that there would be stakeholder involvement but a schedule couldn’t be developed until the final rule is out. He said that EPA received approximately 3.5 million comments on its proposed rule. Given the rule’s complexity and the tight rulemaking schedule, Chairman Carter suggested that the committee consider holding an informational meeting on the final rule before the September AQC meeting provided that the final rule is released on schedule and staff has opportunity to review it.

Dr. Raymond asked if the plan is to be a North Carolina only initiative. Director Holman noted that no final decisions have been made yet and staff continues to look at/evaluate the benefits to North Carolina from a single only versus multistate approach.

Chairman Carter questioned mention of the interim period being from 2020-2029 noting that follow up on that could occur at a subsequent time.

Agenda Item #4, Revisions to Volatile Organic Compound (VOC) Rules (532) (Joelle Burleson, DAQ)

Ms. Burleson said the concept she will be presenting is on revisions to the VOC rules to remove unnecessary requirements and reduce burden. She explained that given the recognized role of manmade VOCs in ozone formation in a NOx limited atmosphere such as North Carolina's, the DAQ is evaluating the applicability of the VOC rules and whether statewide applicability of some of the rules needs to remain in place. Based upon the outcome of that evaluation, the VOC rules in 15A NCAC 02D .0900 may need to be amended to remove unnecessary requirements and reduce burden for facilities in ozone attainment areas. Other related rules may also need to be revised. She stated that these amendments are being proposed by staff, and the existing VOC rules would continue to apply in ozone non-attainment areas as required under the Clean Air Act.

Discussion:

Chairman Carter said the previous viewpoint was that VOC concentrations drove ozone concentrations higher in ambient air. As indicated by Ms. Burleson, the new viewpoint is that NOx concentrations drive ozone concentrations higher in ambient air. In North Carolina VOC releases are ubiquitous and many are uncontrollable because they come from natural sources. Given these facts, VOC controls and related regulations may have a small effect on ozone formation and attainment in current and future air quality situations.

DRAFT RULES

Agenda Item A, Streamlining of Permit Exemptions Rule (532) (Patrick Knowlson, DAQ)

Mr. Knowlson noted that the proposal for streamlining the permit exemption rules will involve revising four draft rules:

15A NCAC 02Q .0102, Activities Exempted From Permit Requirements

02Q .0302, Facilities Not Likely To Contravene Demonstration

02Q .0318, Changes Not Requiring Permit Revisions

02Q .0903, Emergency Generators and Stationary Reciprocating Internal Combustion Engines

Mr. Knowlson stated that Rule 15A NCAC 02Q .0102 is proposed for amendment to simplify the rule to make it easier to understand and to reduce the burden of permitting on many small facilities. The primary rule for streamlining permit exemptions is Rule 02Q .0102 which was re-structured with a top-down approach to make it more user friendly. Key provisions for exempting facilities from permitting in the revised rule would include:

- Emission metrics would be in actual emission levels (not potential-to-emit levels) of regulated pollutants, including PM, SO₂, NO_x, VOCs, carbon monoxide, hazardous air pollutants, and toxic air pollutants.
- Facilities exempt from permitting would be those with actual emissions less than five tons per

year of any individual pollutant and ones with less than ten tons per year of total aggregate pollutant emissions.

- Synthetic minor facilities would not be exempt.
- Facilities that are not exempt from permitting under the proposed exemption with a total aggregate actual emissions equal to or greater than 5 tons per year but less than 25 tons per year would be eligible for registration instead of obtaining a permit.
- Facilities ineligible for registration would include those:
 - Permitted as synthetic minors,
 - With a source subject to a MACT rule,
 - With a source of VOCs or NO_x emissions in a non-attainment area, and
 - With a source subject to a New Source Performance Standard (NSPS) rule unless exempted under another Paragraph in Rule 02Q .0102.

Mr. Knowlson said that Paragraph (i) in Rule 02Q .0102 was expanded to also cover provisions contained in Paragraphs (d) and (e).

Rule 15A NCAC 02Q .0302 is proposed for amendment to remove the automatic triggering of sources subject to Generally Available Control Technology (GACT) rules. In addition, the proposed rule would include some minor language cleanup.

Rule 15A NCAC 02Q .0318 is a proposed new rule that lists minor allowable changes not requiring a permit modification for non-Title V facilities similar to rule 02Q .0502(b)(10) for Title V facilities. The proposed rule would require written notification to DAQ at least seven days before a change is made with a requirement for DAQ to notify the facility of its determination within seven days of receipt of the notification.

Rule 15A NCAC 02Q .0903 is proposed for amendment to add an exemption from permitting for stationary reciprocating internal combustion engines (RICE) if the engine is the only source of the facility's emissions. The proposed rule would apply to facilities with the following characteristics:

- Whose only sources are emergency generators and stationary RICE
- With actual emissions less than 100 tons per year of a regulated pollutant
- With actual emissions less than 10 tons per year of a single hazardous air pollutant
- With actual emissions less than 25 tons per year of any combination of hazardous air pollutants.

Discussion:

Chairman Carter questioned whether the emergency generators and RICE units were pulled out of Rule 02Q .0102 and placed in Rule .0903. Mr Knowlson confirmed that was the case but that it applied where those engines were the only emission units at a given source. Chairman Carter questioned the role of registration in terms of the number of facilities affected. Director Holman replied that the proposed rule would expand the role of registration to a larger number of sources with actual emissions up to 25 tons per year. Chairman Carter entertained a motion to approve this proposal for streamlining the permit exemption Rules to go before the full commission in the September meeting. Dr. Raymond made a motion to approve the proposal and Mr. Ferrell seconded.

July EMC AGENDA ITEMS

Chairman Carter requested that Ms. Joelle Burleson of DAQ deliver a brief presentation on the three Agenda Items below since Mr. Ray Stewart of DAQ was not scheduled to give the presentations until the EMC meeting the following day. All three Agenda Items were grouped together with public hearings held on June 9, 2015 and a comment period which closed on June 15, 2015. For each, no changes were made in the proposed rules and the Hearing Officer recommends that the proposed amendments as presented in Chapter II of the corresponding hearing reports be adopted by the EMC.

Agenda Item #5, Hearing Officer's Report on Permanent Amendments to Clarify Applicability of Prevention of Significant Deterioration (PSD) Rule for Greenhouse Gases and Title V Applicability Rule (528) (Joelle Burleson, DAQ)

Ms. Burleson said the public hearing on amendments to clarify applicability of PSD rule for GHGs as well as the Title V applicability rule was held on June on 9, 2015 in Raleigh to take public comment on the amendments to 02D .0544 and 02Q .0502. Mr. Ray Stewart of the Winston Salem Regional Office served as hearing officer. The rules were previously adopted by the Commission as temporary amendments and became effective December 2, 2014. The public comment period on the rules ended June 15, 2015. The rule changes are the result of the June 2014 Supreme Court decision in UARG v. EPA that addressed applicability of greenhouse gases for PSD as well as Title V applicability. The EMC approved the fiscal note during the process which estimated impacts of about \$46,000 annually starting in 2015 and increasing each year with inflation. The affected facilities cost savings was the difference in Title V permit fees and the impact to the state would be the equivalent loss of those fees for sources that otherwise would be required to submit an application.

One comment was received on the proposed rule amendments during the public comment period. The commenter, EPA, indicated that North Carolina's revisions to its rules appear consistent with the U.S. Supreme Court decision but EPA cannot confirm DAQ's rule revisions will be sufficient to obtain EPA's approval until EPA undertakes its own revisions to federal regulations to address the Supreme Court's decision. No changes were made to the proposed rule amendments as a result of the public comment period. Approval of the rule will be requested at the July EMC meeting.

Discussion:

Chairman Carter noted that this proposed rule is to be a permanent rule for replacing the temporary rule adopted last year with essentially the same content.

Agenda Item #6, Hearing Officer's Report to Reflect S.L. 2014-120 Repeal of Source Reduction and Recycling Reporting Requirements(530), (Joelle Burleson, DAQ)

Ms. Burleson explained that currently the reporting requirements in 15A NCAC 02Q .0200 Permit Fees, .0300 and Title V procedures specify that sources submit a written description of their current and projected plans to reduce emissions of air contaminants. S.L. 2014-120 repealed

this reporting requirement. The rulemaking is to reflect that statutory change in the rules per the statutory requirements. Rules 15A NCAC 02Q .0206, Payment of Fees .0304, Applications, and .0507, Application, were proposed for amendment. A regulatory impact analysis was completed per the APA and the rule amendments were found not to have substantial impact and little or no impact on state or local governments. The analysis was previously approved in order to proceed to public comment. No public comment was received during the comment period and the hearing officer plans to recommend approval of the proposed rule amendments at the July EMC meeting.

Discussion: None

Agenda Item #7, Hearing Officer's Report on Revision to the National Ambient Air Quality Standard (NAAQS) for Particulate Matter (PM2.5)(528), (Joelle Burleson, DAQ)

On June 9, 2015 the agency held a public hearing on revisions to the ambient standard for particulate matter PM2.5 and took comments on amendments to adopt the 2012 federal national ambient air quality standard into the state standards. The EMC previously approved a regulatory impact analysis and to proceed to comment. Only a letter from US EPA Region 4 noting that they had completed their preliminary review of the proposed amendments and had no comments was received. No changes were made to the proposed rule as a result of comment and the hearing officer plans to recommend approval of the proposed rule at the July EMC meeting.

Discussion: None

INFORMATION ITEMS

Agenda Item #8, Periodic Review of Rules Report for 15A NCAC 02D and 02Q (Joelle Burleson, DAQ)

At the March 12, 2015 EMC meeting, the DAQ received approval to proceed to public comment with the review of the air quality rules in 15A NCAC 02D, Air Pollution Control Requirements, and 02Q, Air Quality Permit Procedures. The rules review follows the procedure mandated by S.L. 2013-413 (formerly HB74) incorporated into the APA. The review covers all existing 353 rules in the air quality program: 15A NCAC 02D (263 rules) and 02Q (90 rules).

In accordance with General Statute 150B-21.3A, the EMC made an initial determination of "necessary with substantive public interest" for 232 rules, "necessary without substantive public interest" for four rules, and "unnecessary" for 27 rules in 15A NCAC 02D and "necessary with public interest" for 90 rules in 15A NCAC 02Q. A comment period was held from March 13, 2015 to June 19, 2015 to accept comments on the Periodic Review of Rules Reports.

Following approval by EMC of its final report, the report will be submitted to the Office of Administrative Hearings for review by the Rules Review Commission and once their review is completed they will submit their final report to the Joint Legislative Administrative Procedures Oversight Committee (APO) for their review. Once the APO finalizes the report, rules that

remain classified as “unnecessary” would be repealed, rules that are classified “necessary with substantive public interest” would be readopted after the report is finalized as if they were new.

Staff presented an overview of the comments received and will return to the AQC in September with a final recommendation for the EMC’s action at their November 2015 meeting.

A total of 11 sets of comments were received from various persons and entities via the online system and/or letter or email addressing a total of 35 rules.

The 15A NCAC 02D .1600 General Conformity rules were initially classified as unnecessary. Comments were received that these rules should be classified as “necessary”. Previous federal requirements for states to have these requirements in their rules were removed as a result of the Congressional Act, Safe, Accountable, Efficient Transportation Equity Act SAFETEA-LU. Staff continues to recommend the rules as unnecessary.

The state Clean Air Interstate Rules (CAIR) in Section 02D .2400 were initially recommended as unnecessary. Comments were received that the rules should be retained until ongoing litigation surrounding the Cross State Air Pollution Rule (CSAPR) is resolved and another comment that the rules are necessary and should be updated to include the CSAPR rules. The federal CAIR rules on which the rules were based were previously struck down by the courts and EPA has since transitioned to implementation of the Cross State Air Pollution Rule (CSAPR) as of the beginning of this year. Staff continues to recommend these rules remain classified as unnecessary.

Comments were also received on the 15A NCAC 02D .2500 Mercury Rules for EGUs, initially classified as unnecessary, that they should be retained and strengthened. The rules were developed on the basis of the subsequently vacated EPA Clean Air Mercury Rules (CAMR). DAQ continues to consider the .2500 mercury rules as unnecessary and plans to bring a presentation on any remaining state provisions of the .2500 rules to the September 2015 AQC meeting.

Eight of the rules on which comment was received were already classified as “necessary with substantive public interest” and comments on those rules will be addressed through the readoption process.

Staff is not recommending any changes to the initial classifications of the 02D rules. Staff is not recommending any changes to the classification of rules in 15A NCAC 02Q.

Discussion:

There was a series of comments by EMC Chairman Carroll, AQC Chairman Carter, and DAQ Director Holman discussing the issues on how the rulemaking process for fiscal notes and public hearings would be handled for the hundreds of rules to be re-adopted from the rules review effort. The concern is for the impact on the timing and resources involved for a rulemaking process involving a large number of rules (on the order of a few hundred rules) that was originally designed for a small number of rule amendments (on the order of a few rules).

Potential opportunities to streamline the process to make the most efficient use of limited available resources in a manner consistent with provisions of the Administrative Procedures Act were discussed.

Agenda Item #9, Startup, Shutdown, and Malfunction (SSM) State Implementation Plan (SIP) Call Update (Sheila Holman, DAQ Director)

Director Holman explained that the EPA has taken final action published June 12, 2015 on how provisions in EPA-approved SIPs treat excess emissions during periods of SSM. The EPA is revising its guidance concerning its interpretation of the CAA requirements with respect to treatment in SIPs of excess emissions that occur during SSM periods in light of recent court decisions addressing this issue. The EPA found that certain SIP provisions in 36 states, including North Carolina, are substantially inadequate to meet CAA requirements and issued a "SIP call" for those states. States subject have until November 22, 2016 to submit corrective SIP revisions.

Director Holman said that the DAQ is still evaluating the next steps for rulemaking, discussing issues with other subject states, looking at rules for states with approved SSM SIP provisions, and had an initial meeting with industry on developing suitable SSM SIP provisions. DAQ will provide an update on this matter at the September AQC meeting.

Discussion: None

Agenda Item #10, Results of DAQ Study on Emissions from Gas Activities (Sushma Masemore and Mike Abraczinskas, DAQ)

Ms. Masemore said the presentations will be a high-level overview on air emissions related to the oil and gas sector from a two year study on oil and gas activities in central North Carolina. She stated that under S.L. 2012-143, Section 2(c) as amended by S.L. 2015-1, Section 6, DAQ is required to:

1. Estimate emissions from shale oil and gas exploration, development,
2. Estimate emissions from associated truck traffic, and
3. Determine the impact to ozone levels from all gas activities.

To conduct such an assessment on oil and gas activities, DAQ built an emissions inventory, conducted photochemical modeling by inputting emission data into the model along with meteorological conditions to quantify formation and transport of ozone and pollutants. Such an effort allowed DAQ to assess the air quality impacts, quantify the change in pollutants' levels in order to determine the impacts to various locations in the surrounding areas. There were 16 individual VOC pollutants or VOC pollutant groups inventoried and studied that are known to contribute to ozone (O₃) which is formed from NO_x and VOCs in the presence of sunlight.

DAQ evaluated the complete process across the four primary areas of shale gas activities, including development of the well sites, well production, gas processing, and gathering/transmission/distribution of the final gas product. Several key assumptions were identified concerning the amount of affected land in the Sanford sub-basin; the number, schedule, and

spacing between the wells drilled; the amount and composition of the gas produced; and other factors affecting air emissions. Total annual emissions for Year 6 was assumed to be distributed evenly throughout the year to arrive at a “maximum activity” daily emission rate. DAQ estimated daily and annual emissions for the criteria air pollutants for each of the four primary areas of shale gas activities.

Deputy Director Mike Abraczinskas then continued the presentation and said that DAQ conducted photochemical modeling by using the latest modeling platform to estimate air quality impacts from shale gas development. Four modeling runs were performed for:

- Base 2007 emissions
- Base 2018 emissions
- Scenario 1 - Base 2018 emissions merged w/ estimated shale gas emissions.
- Scenario 2 - Base 2018 emissions merged w/ only the estimated NOx emissions from shale gas development.

The ambient air quality impacts were estimated by taking the difference between the base 2018 and each of the shale gas scenarios. DAQ focused on the highest ozone days in the Base 2018 run for analysis that consisted of 59 total days studied across 11 nearby locations with air quality monitors. The results of the assessment lead to the following conclusions:

- The average daily NOx emissions attributed to shale gas activities are estimated to be ~3.7 tons per day.
- No ozone attainment concerns anticipated relative to the current ozone national ambient air quality standard (NAAQS) of 75 ppb.
- The additional emissions from this “maximum activity” scenario are predicted to increase ozone by less than 2 parts per billion (ppb) in Lee County, and by less than 1 ppb across the remaining central NC monitoring sites.

Deputy Director Abraczinskas noted the presentation consolidated 2 years worth of work previously presented to the Mining and Energy Commission’s Emission Standards Committee into approximately 20 minutes. Mr. Abraczinskas noted that further information on the DAQ study with a complete description of the methodology, results and assumptions is available at www.ncair.org/news/shale. He also thanked the staff of DAQ including Sushma Masemore, Robin Barrows, Tammy Manning, Paula Hemmer, Nick Witcraft, Elliot Tardiff, Bradley McLamb, Andy Bollman, Nancy Jones, and the staff of the Division of Energy, Minerals, and Land Resources for their tremendous amount of work on this big project.

Discussion:

Commissioner Ferrell commented he was surprised that trucks’ idling emissions were comparable to trucks’ driving emissions. Ms. Masemore explained that while idling, the trucks’ engines are also operating other engines performing work on site. The truck emissions data used in the study was based on data collected in a Texas fracking survey.

Dr. Raymond asked how the emissions from the wastewater processing steps were accounted for in the study. Ms. Masemore stated that DAQ did account for the emissions for the fracking fluid

stored on site and later transported to an offsite treatment facility, but that it was difficult to account for any evaporative losses from the open pits.

Commissioner Solomon asked about whether the extent and impact of the trucks' emissions were comparable to a major distribution center for food or big box companies that may be coming to North Carolina. Ms. Masemore said that they could be comparable, depending on the number and size of the trucks and the proximity and concentration of the affected population.

Mr. Ferrell said as a member of both MEC and EMC that Deputy Director Abraczinskas and his staff had done a great job putting together the requested information on shale gas activities. Mr. Ferrell also complimented the staff for doing a great job of condensing the technical information just given in a 20-minute overview presentation to the AQC that previously took 2½ hours in a detailed presentation to the Environmental Standards Committee of the Mining and Energy Commission. He noted that the presentation just heard was one of a series of five presentations done to determine what the air quality issues are that should be referred to the EMC for further review. The MEC goes out of business at the end of July and how it will be reconstituted is unknown, but the work done will be bundled with other unfinished work that needs to be further investigated and passed along to the new Oil and Gas Committee and if there are any subsequent activities or actions requested from the EMC, they will come from that Committee.

Commissioner Tedder echoed his compliments to staff on providing a concise presentation of a complex technical issue.

INFORMATION ITEMS

Agenda Item #11, Director's Remarks (Sheila Holman, DAQ)

Director Holman added her compliments thanking staff for their excellent work day in and day out.

Director Holman welcomed new Commissioner Solomon.

She also thanked Angela Terry, the DAQ Planning Section office assistant who has assisted the Air Quality Committee with logistics who is retiring at the end of July for her service over the years.

1. Charlotte Redesignation Request Process

Director Holman began with the Charlotte redesignation request for the 2008 ozone standard. DAQ submitted the package to EPA in mid-April and EPA proposed approval of the redesignation. Significant comments were received from the Sierra Club, including that they had concerns that:

- The 2013 and 2014 ozone data levels were atypical due to cooler than usual weather;
- The achievement of the 75 ppb ozone standard was largely due to favorable meteorology and not actual emission reductions;

- An environmental justice analysis should be required relative to a re-designation request; and
- The re-designation should not rely on NO_x emission trading programs available in Clean Air Interstate Rule (CAIR) or the Cross-State Air Pollution Rule (CSAPR).

2. Update on the 2015 Ozone Season Ambient Air Monitoring Results

The 2015 ozone season is roughly half-over and already there have been many unusually warm days. So far there has been a limited number of exceedances above the 75 ppb ozone standard, all three of which were on one day, June 25th, during days with 90+ °F temperatures. The higher values seen were 76 in Charlotte and in the Triad area one monitor reading at 76 and one at 78.

Chairman Carter asked for further comments and with no further comments, Chairman Carter adjourned the meeting.