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November 20, 2024

Jeaneanne Gettle, Acting Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Pre-hearing Draft of Exceptional Events Demonstration to Support Attainment Designation Recommendations for the 2024 Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) for Mecklenburg and Davidson Counties, North Carolina (June – July 2023 Canadian Wildfire Smoke Impacts)

Dear Ms. Gettle:

I am pleased to submit the pre-hearing draft of the *Exceptional Events Demonstration to Support Attainment Designation Recommendations for the 2024 Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) for Mecklenburg and Davidson Counties, North Carolina (June – July 2023 Canadian Wildfire Smoke Impacts)*. Enclosed is the complete package uploaded into the United States Environmental Protection Agency's (EPA) State Planning Electronic Collaboration System (SPeCS) for your staff to review.

Based on certified monitoring data for 2021-2023, the Remount Road monitor (371190045) in Mecklenburg County and Lexington Water Tower monitor (370570002) in Davidson County have a rounded design value of 9.2 micrograms per cubic meter. The North Carolina Division of Air Quality (DAQ) reviewed the monitoring data and determined that Canadian wildfire smoke-laden air masses significantly increased PM_{2.5} concentrations measured by these two monitors during four multi-day events in June and July of 2023. These events were significant enough to increase the three-year average design value for each of the two PM_{2.5} monitors to slightly above the revised standard.

In accordance with EPA's Exceptional Events Rule (40 CFR 50.14(c)(3)), the DAQ prepared this Exceptional Events demonstration to show that Canadian wildfire smoke significantly increased PM_{2.5} concentrations during four events. If it were not for these exceptional events, the design value for each monitor would be below the revised standard. Based on the technical analyses presented in the Exceptional Events demonstration, the DAQ is requesting that EPA exclude days highly impacted by Canadian wildfire smoke from the design value for each monitor to show attainment of the revised primary annual PM_{2.5} standard. This document has been prepared to support the State of North Carolina's designation recommendations for the 2024 revised primary annual PM_{2.5} NAAQS.¹ Note that the Canadian wildfire smoke contributed to elevated design values for many other monitors in North

¹ Note that on September 11, 2024, the DAQ submitted an "Initial Notification of Potential Exceptional Event Submission for the Revised Primary Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS)" to EPA in accordance with Section (40 CFR 50.14(c)(2)) of the Exceptional Events Rule.



Carolina; however, the design values are below the revised NAAQS and therefore not eligible for inclusion in an Exceptional Events demonstration at this time.

The DAQ will issue a public notice announcement, in accordance with 40 CFR 51.102, indicating that the pre-hearing draft of the *Exceptional Events Demonstration to Support Attainment Designation Recommendations for the 2024 Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) for Mecklenburg and Davidson Counties, North Carolina (June – July 2023 Canadian Wildfire Smoke Impacts)* is available for public comment and is posted on the DAQ website for review. The public comment period will be open from Wednesday, November 20, 2024, through Friday, December 20, 2024. The public notice announcement will indicate that anyone may request a public hearing by December 4, 2024, and, if requested by this date, the public hearing will be held on December 20, 2024. The public notice will include the hearing date, time, location, and methods to access the hearing.

In addition to posting on the website, the public notice announcement will be sent to a number of email distribution lists managed by the DAQ, which will include numerous stakeholders from industry and environmental groups. The DAQ has found that sending the public notice announcements to these groups is more effective than publishing the notices in a few local newspapers and is consistent with the requirements described in the April 6, 2011, memorandum, *“Regional Consistency for the Administrative Requirements of the State Implementation Plan Submittals and the Use of Letter Notices.”* The document will also be made available for in-person review during normal business hours at the DAQ Central Office in Raleigh and the DAQ Regional Offices in Mooresville and Winston-Salem.

The DAQ intends to submit a final version of this pre-hearing draft for incorporation into North Carolina’s State Implementation Plan through EPA’s SPeCS web-based system after considering relevant public comments. If you should have any questions, please contact Tammy Manning of my staff at (919) 707-8717 or tammy.manning@deq.nc.gov.

Sincerely,



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

MAA/rps

Enclosures

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