DIVISION OF AIR QUALITY June 7, 2010

MEMORANDUM

TO: Don Van der Vaart, Chief, Permits Section

FROM: Jim Roller, Supervisor, Air Quality Analysis Branch (AQAB)

SUBJECT: Interim 1-Hr SO₂ Significant Impact Level (SIL)

Until EPA develops and promulgates a 1-hr SO₂ SIL for the recently signed new SO₂ 1-hr NAAQS, I recommend we adopt an interim 1-hr SO₂ SIL of 10 ug/m^3 .

A 10 ug/m³ SIL was initially developed by the Northeast States for Coordinated Air Use Management (NESCAUM) for NO₂ and is based on the ratio of the existing 1-hr CO SIL to the 1-hr CO NAAQS ((2000 ug/m³/ 40,000 ug/m³) x 188 ug/m³ = 10 ug/m³ (rounded up from 9.4 ug/m³). CO is the only other criteria pollutant with a 1-hr NAAQS. NCDAQ reviewed and agreed with their assessment and subsequently, adopted the 10 ug/m3 SIL for NO₂ for use in NC (attachment). Since the new SO₂ standard is also a 1-hr NAAQS, I believe the same logic / procedure can be used to develop an interim SO₂ SIL for NC ((i.e. 2000 ug/m³/ 40,000 ug/m³) x 196 ug/m³ = 10 ug/m³ (rounded up from 9.8 ug/m³)).