

Appendix C

Public Notice Report, Comments Received and Responses

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Public Notice Report
For the
Supplement to the Redesignation Demonstration and Maintenance Plan
for The Charlotte-Gastonia-Rock Hill, North Carolina –South Carolina
1997 8-Hour Ozone Nonattainment Area

Introduction

On February 8, 2013, a pre-hearing version of the “Supplement to the Redesignation Demonstration and Maintenance Plan for the Charlotte-Gastonia-Rock Hill, North Carolina – South Carolina 1997 8-Hour Ozone Nonattainment Area” was submitted to the United States Environmental Protection Agency (USEPA). A request for public hearing, in accordance with 40 CFR 51.102, and the public comment period were published on the North Carolina Division of Air Quality (NCDAQ) website, as well as to email distribution lists managed by the NCDAQ. The public comment period was open from February 8, 2013 through March 15, 2013. No requests for a public hearing were received. The public comment period elicited comments from the USEPA, North Carolina Petroleum and Convenience Marketers (NCPCM) and the Charlotte Department of Transportation.

Background

The area surrounding Charlotte-Gastonia-Rock Hill, North Carolina-South Carolina (i.e. the Metrolina area) was designated nonattainment for the 1997 8-hour ozone National Ambient Air Quality Standards (NAAQS) on April 30, 2004 (69 Federal Register 23858). The Metrolina nonattainment area includes the North Carolina counties of Cabarrus, Gaston, Lincoln, Mecklenburg, Rowan and Union; Coddle Creek and Davidson Townships in Iredell County, North Carolina; and the Rock Hill Metropolitan Planning Organization boundary in York County, South Carolina. The nonattainment designation was an action taken by the USEPA under Section 107(d) of the Clean Air Act (CAA). The CAA requires that some area be designated as nonattainment if a monitor is found to be in violation of a NAAQS. The USEPA took designation action in 2004 based on the ambient data from 2001-2003. At that time, the regional design value, the highest monitor’s design value, was 0.100 parts per million (ppm).

There are currently seven ozone monitors located throughout the Metrolina nonattainment area and one monitor located in York County, South Carolina, just outside of the nonattainment area. The latest design value for the nonattainment area is 0.083 ppm based on the data from 2010-2012, and is therefore in attainment of the 1997 8-hour ozone NAAQS, and the area is eligible to be considered for redesignation to attainment.

The State of North Carolina has implemented permanent and enforceable reductions in ozone precursor emissions in the Metrolina area. These actions include implementing the on-board diagnostic vehicle inspection and maintenance program that was phased-in in the Metrolina nonattainment area from July 1, 2002 through January 1, 2004, and an open burning ban during ozone action days. In addition, the adoption of several State rules have resulted in reductions in

emissions within the nonattainment areas and nearby areas that have resulted in lower ozone levels at the monitor. These State actions include the NO_x SIP Call rules and the Clean Smokestacks legislation. Finally, several actions at the Federal level by the USEPA have resulted in lower emissions throughout the eastern portion of the country. These Federal actions include the Tier II engine standards for light and medium duty vehicles, heavy-duty engine standards, the low sulfur gasoline and diesel requirements, off-road engine standards, the NO_x SIP Call and the Clean Air Interstate Rule (CAIR). CAIR was remanded by the court and although North Carolina did not rely on the emission reductions from CAIR for maintenance of the 1997 8-hour ozone standard, CAIR will result in additional reductions in NO_x emissions regionally.

North Carolina is requesting that the USEPA redesignate the Metrolina nonattainment area to attainment. The monitoring data clearly shows that the region has attained the 1997 8-hour ozone standard, and the maintenance demonstration shows that the future emission inventories are expected to be lower than the base year inventory through the implementation of the various control measures listed above.

Summary of Public Comment Period

The public notice comment period was open from February 8, 2013 through March 15, 2013. There were no requests for a public hearing. Comments were received from the USEPA, the NCPCM and the Charlotte DOT, which are attached following this report.

The following is a summary of the pertinent comments raised during the public comment period, along with the NCDAQ's response.

USEPA comment: We have completed our review of the prehearing submittal and offer no comments at this time.

NCDAQ response: The NCDAQ acknowledges this comment. No revisions are required.

NCPCM comment: NCDAQ should analyze the air quality impact of increasing the Reid Vapor Pressure (RVP) gasoline standard from the currently required 7.8 pounds per square inch (psi) to 9.0 psi in Gaston and Mecklenburg counties.

NCDAQ response: The NCDAQ acknowledges this comment, and intends to review the consequences of increasing the RVP of motor gasoline in Gaston and Mecklenburg Counties with respect to air quality impacts across the Metrolina area. This analysis will be conducted at a later date, and is not the subject of this redesignation and maintenance plan.

Charlotte DOT comment: It appears that the MVEBs on page 40 of the narrative, in Table 4-6, were unintentionally copied from the MVEBs in Table 4-5. Table 4-6 describes the Mecklenburg-Union MPO/Rocky River RPO MVEB in kilograms per day. The correct or expected MVEBs do appear in Appendix B, Table 4.4.3-6. The values in Table 4.4.3-6 should also appear in Table 4-6 of the narrative.

NCDAQ response: The NCDAQ acknowledges this comment, and has made the requested correction in the narrative.

Attachments to Public Notice Report

- 1) Written comments from R. Scott Davis, Chief of the Air Planning Branch, USEPA, dated March 14, 2013.
- 2) Written comments received from Gary F. Harris on behalf of the North Carolina Petroleum and Convenience Marketers dated March 18, 2013.
- 3) Written comments received from Eldewins M. Haynes of the Charlotte DOT dated February 25, 2013.
- 4) Public Notice Announcement by the North Carolina Department of Environment and Natural Resources.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960



March 14, 2013

Ms. Sheila C. Holman, Director
North Carolina Department of Environment
and Natural Resources
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Dear Ms. Holman:

Thank you for your letter dated February 8, 2013, transmitting a prehearing package regarding the supplement to the Redesignation and Maintenance Plan for the Charlotte-Gastonia-Rock Hill, NC-SC 1997 8-hour ozone nonattainment area. These revisions were the subject of a public comment period beginning February 8, 2013, with written comments due by the close of business on March 15, 2013. We have completed our review of the prehearing submittal and offer no comments at this time.

We look forward to continuing to work with you and your staff. If you have any questions, please contact Ms. Lynorae Benjamin, Chief, Regulatory Development Section at (404) 562-9040, or have your staff contact Nacosta C. Ward at (404) 562-9140.

Sincerely,

A handwritten signature in blue ink that reads "R. Scott Davis".

R. Scott Davis
Chief
Air Planning Branch



Fueling North Carolina's Future

7300 Glenwood Avenue
Raleigh, NC 27612

Phone 919-782-4411
Fax 919-782-4414

www.ncpcm.org

March 18, 2013

Sushma Masemore, P.E., Chief
Planning Section
NC DENR, Division of Air Quality (DAQ)
1641 Mail Service Center
Raleigh, NC 27699-1641

RE: Redesignation Demonstration and Maintenance Plan for the Charlotte-Gastonia-Rock Hill, NC-SC
1997 8-hour Ozone Nonattainment Area

Dear Ms. Masemore:

The North Carolina Petroleum & Convenience Marketers (NCPCM) supports the North Carolina Department of Air Quality (NC DAQ) request that the US Environmental Protection Agency (EPA) redesignate the Metrolina area to attainment of the 1997 8-hour ozone standard based on the past three years of monitoring data. We also agree that the NC DAQ should request an expeditious review and seek approval of this plan before the implementation requirements for the 2008 ozone standard begins.

In North Carolina, an abundance of biogenic Volatile Organic Compounds (VOCs - 90%) makes the majority of the State a nitrogen oxides (NOx) limited environment for the formation of ozone. Since reductions in man-made VOC emissions do not reduce ozone levels, having a lower Reid Vapor Pressure (RVP) motor gasoline during the summer months from June - September is not an effective control measure for ozone. In addition, it results in higher fuel costs, impacting government, businesses and consumers at the pump. During the past two summers the price difference has escalated to an average of 9.4 cents more per gallon of gasoline. This has cost NC consumers approximately \$40 million each summer in nine NC counties.

NC DAQ should analyze the air quality impact of increasing the RVP of motor gasoline from the currently required 7.8 psi to 9.0 psi in Gaston and Mecklenburg counties. Hopefully, this study will impact future redesignation demonstration and maintenance plans. We understand that more recent scientific observations question the current view that a reduction of VOC emissions results in decreased ozone levels.

Again, NCPCM requests that the NC DAQ complete emission models for 9.0 psi RVP motor gasoline for Mecklenburg & Gaston Counties. The goal of the model being a removal of an ineffectual 7.8 psi standard while not harming air quality and that meets Metrolina goals of maintaining ozone attainment status.

Please notify us if we may be of further assistance.

Respectfully,

Gary F. Harris
Executive Director



Masemore, Sushma

From: Haynes, Eldewins [ehaynes@ci.charlotte.nc.us]
Sent: Monday, February 25, 2013 11:52 AM
To: SVC_DENR.DAQ.publiccomments
Cc: Gallup, Anna; Cook, Robert
Subject: Metrolina Draft Supplement

On behalf of the City of Charlotte I want to thank the Division of Air Quality for allowing this opportunity to comment on the draft of the Supplement to the Redesignation Demonstration and Maintenance Plan for the Charlotte-Gastonia-Rock Hill, NC-SC 1997 8-Hour Ozone Nonattainment Area. My comments are given below.

- It appears that the MVEBs on page 40 of the narrative, in Table 4-6, were unintentionally copied from the MVEBs in Table 4-5. Table 4-6 describes the Mecklenburg-Union MPO/Rocky River RPO MVEB in kilograms per day. The correct or expected MVEBs do appear in Appendix B, Table 4.4.3-6. The values in Table 4.4.3-6 should also appear in Table 4-6 of the narrative.

Eldewins M. Haynes, Air Quality Specialist
ehaynes@charlottenc.gov
Charlotte DOT
600 East Fourth Street
Charlotte, NC 28202
phone: 704-336-7621
Fax: 704-336-4400

"Many of life's failures are people who did not realize how close they were to success when they gave up." -- Thomas Edison

"Nothing is impossible, the word itself says 'I'm possible!'" – Audrey Hepburn

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT & NATURAL RESOURCES
PUBLIC NOTICE**

PURPOSE: The North Carolina Department of Environment and Natural Resources, Division of Air Quality (NCDAQ), hereby gives notice regarding its Pre-hearing Draft of the Supplement to the Redesignation Demonstration and Maintenance Plan for the Charlotte-Gastonia-Rock Hill, NC-SC (Metrolina), 8-hour Ozone Nonattainment Area. Persons wishing to submit comments or request a public hearing are invited to do so.

COMMENT PROCEDURES: Any person wishing to comment may submit a written statement for inclusion in the record of proceedings regarding the Pre-hearing Draft Supplement Redesignation and Maintenance Plan for the Metrolina Nonattainment Area. Written comments should be received by no later than March 15, 2013.

REQUESTS FOR A PUBLIC HEARING: Requests for a public hearing must be in writing and include a statement supporting the need for such a hearing, an indication of your interest in the subject, and a brief summary of the information intended to be offered at such hearing. A public hearing will be scheduled if requested. A separate notice will be announced for the hearing including the date, time and location. Written requests for a public hearing should be received no later than March 15, 2013. and addressed to Sushma Masemore, Division of Air Quality, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641.

INFORMATION: Copies of the Pre-hearing Draft Supplement Redesignation and Maintenance Plan for the Metrolina Nonattainment Area may be downloaded from the NCDAQ website at http://www.ncair.org/planning/nc_sip.shtml.


Comments can be submitted electronically to:
daq.publiccomments@ncdenr.gov
(Please type "Metrolina Draft Supplement" in the subject line)

Comments can be mailed or faxed to:
Sushma Masemore
NC Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641
Fax: (919) 707-8700

The Pre-hearing Draft Supplement Redesignation and Maintenance Plan for the Metrolina Nonattainment Area may be reviewed in person during normal business hours at the following North Carolina Department of Environment and Natural Resources, Division of Air Quality offices:

Raleigh Central Office, Planning Section	(919)707-8403
Mooresville Regional Office	(704)663-1699

Date: 2/6/2013



Sheila C. Holman, Director