



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Sheila C. Holman  
Director

John E. Skvarla, III  
Secretary

Pat McCrory  
Governor

March 28, 2013

Gwen Keyes Fleming  
Regional Administrator  
USEPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

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

Dear Ms. Fleming:

I am pleased to submit the Supplement to the Redesignation Demonstration and Maintenance Plan for Charlotte-Gastonia-Rock Hill, NC-SC 1997 8-hour Ozone Nonattainment Area. Enclosed is one hard copy of the complete package containing the supplement to the redesignation demonstration and maintenance plan, as well as the supporting documentation. An exact duplicate electronic copy is being provided with Motor Vehicle Emission Simulator (MOVES) model input and output files.

The maintenance plan requires three specific items to be addressed. The first is an analysis of the ambient air quality data demonstrating attainment with the 1997 8-hour ozone National Ambient Air Quality Standard. The second is an emissions inventory comparison showing that the 1997 8-hour ozone standard can be maintained for 10 years beyond the approval of the plan. The third is the contingency measures to be implemented in the event of an air quality violation or other indications of an impending violation. Thus, the maintenance plan fulfills the requirements of Section 175 A (b) of the Federal Clean Air Act as amended.

This supplement covers four additions and/or changes to the original redesignation demonstration and maintenance plan. The first is the addition of future year 2025 emissions inventory for point sources, area sources, on-road mobile sources, and non-road mobile sources. The second is the updating of the ambient air quality monitoring data for years 2011 and 2012, which were not available at the time the original document was submitted. The third is the accounting of point source emissions for facilities that have recently rescinded their operating permits. Emissions for these sources are included in this supplement because some of these plants may resume operation when the economy improves. The final change to the supplement is the use of more recent fuel properties data to calculate non-road emissions.

The NCDAQ issued a public notice announcement on February 8, 2013 indicating the Supplement to the Redesignation and Maintenance Plan documentation was available for public

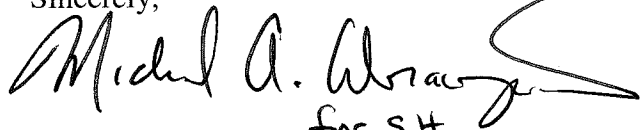
1641 Mail Service Center, Raleigh, North Carolina 27699-1641  
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Internet: [www.ncair.org](http://www.ncair.org)

comment and posted on the NCDAQ website for review. The public notice announcement was sent to a number of distribution lists managed by NCDAQ. These distribution lists included numerous stakeholders from industry, environmental groups, and transportation partners. The NCDAQ believed that sending the public notice announcement to these groups was 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 State Implementation Plan Submittals and the Use of Letter Notices." Additionally, the NCDAQ website has Rich Site Summary (RSS) feeds which regularly delivers changes to the website content to those that have signed up for it.

The opportunity to request a public hearing, in accordance with 40 CFR 51.102, and the public comment period were open from February 8, 2013 to March 15, 2013. No request for a public hearing was submitted to the NCDAQ. Comments were received from the United States Environmental Protection Agency (USEPA), the North Carolina Petroleum and Convenience Marketers (NCPCM) and the Charlotte Department of Transportation (DOT). The USEPA offered no comments at this time. The NCPCM commented in support of the redesignation request, and requested the NCDAQ to conduct an air quality analysis of relaxing the current federal gasoline volatility standard in Gaston and Mecklenburg counties, with the goal of maintaining the ozone attainment status and providing economic relief to North Carolina consumers and businesses from higher fuel prices. The Charlotte DOT identified a table that was inadvertently duplicated in the narrative. Copies of letters submitted by the commenters are provided in Appendix C - Public Notice Report.

The NCDAQ believes it has in good faith addressed the requirements of Section 107(d)(3)(E) of the Clean Air Act to redesignate the Charlotte-Gastonia-Rock Hill nonattainment area to attainment of the 1997 8-hour ozone standard. If you have any questions regarding this submittal, please contact Sushma Masemore of my staff at (919) 707-8700.

Sincerely,

  
Sheila C. Holman for S.H.

SCH/ssm

Attachment

cc: Michael Abraczinskas, NCDAQ  
Sushma Masemore, NCDAQ  
Scott Davis, USEPA  
Lynorae Benjamin, USEPA  
Don Willard, Mecklenburg County Air Quality