



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Sheila C. Holman
Director

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Secretary

Pat McCrory
Governor

October 11, 2013

A. Stanley Meiburg
Acting Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Final State Implementation Plan Supplement - Emissions Inspection and Maintenance Program and Maintenance Demonstration for North Carolina

Dear Mr. Meiburg:

I am pleased to submit the Final Supplement "State Implementation Plan (SIP) for the North Carolina Emissions Inspection and Maintenance (I/M) Program" and the maintenance demonstration associated with the I/M Program change. Enclosed is one hard copy of the complete package containing the SIP, the maintenance demonstration, as well as the supporting documentation as to how the emission estimates were developed and an exact duplicate electronic copy on compact disk. The package also includes the on-road MOVES model input and output electronic files on compact disk.

On August 1, 2012, the North Carolina General Assembly enacted House Bill 585 (Session Law 2012-199) which exempts certain vehicles 1996 or newer from requiring an emissions inspection. The law is interpreted as exempting vehicles of the three newest model years with less than 70,000 miles on the odometer from an emissions inspection requirement. Prior to the law being enacted, only the newest model year (1st year) vehicles were exempted from the state I/M program.

As this new exemption will increase emissions of nitrogen oxides (NO_x), volatile organic compounds (VOC), and carbon monoxide (CO) in counties where the I/M program is in place, a SIP revision is required to be submitted to the U.S. Environmental Protection Agency (EPA) demonstrating that the SIP complies with the requirements of Section 110(l) of the Clean Air Act as amended.

In this submittal, the North Carolina Division of Air Quality (NCDAQ) is increasing the compliance rate of the I/M program from 95% to 96% to offset the emission increases due to the change in the I/M program. Modeling has been performed to demonstrate that this tightening of the compliance rate is both currently achieved by the program and results in the required reductions in emissions in CO, VOC, and NO_x. Attachment A contains the demonstration required to show that the target changes to the I/M program will not interfere with the attainment of the National Ambient Air Quality Standards.

In a separate action, the NCDAQ is amending state rules under 15A NCAC 02D .1000 to comply with the legislation. The draft rules will be submitted to the EPA in a separate transmittal.

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The NCDAQ issued a public notice announcement on August 23, 2013, in accordance with 40 CFR 51.102, indicating that the North Carolina I/M SIP Supplement and Maintenance Demonstration were available for public comment. The public notice announcement was posted on the NCDAQ website for review, and was sent to a number of distribution lists managed by the NCDAQ. The distribution lists include numerous stakeholders from industry, environmental groups, and transportation partners. The NCDAQ believes that sending the public notice announcement 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 State Implementation Plan Submittals and the Use of Letter Notices." Additionally, the NCDAQ website has Rich Site Summary (RSS) feed which regularly delivers changes to the website content to those that have signed up for notification. The document was also made available for in person review during normal business hours at the NCDAQ Central Office in Raleigh and seven Regional Offices throughout the state. Attachment B contains the public notice announcement distributed by NCDAQ.

The public notice announcement also indicated that anyone may request a public hearing. There were no requests for a public hearing. The EPA was the only organization to offer comments, which are contained in Attachment C. The NCDAQ acknowledged these comments and made appropriate revisions to the I/M SIP document as discussed during a follow up meeting held with EPA on September 25, 2013.

The NCDAQ believes it has in good faith addressed the requirements for a maintenance demonstration. If you should have any questions, please contact Sushma Masemore at (919) 707-8700 or sushma.masemore@ncdenr.gov.

Sincerely,



Sheila C. Holman

SCH/cp

Attachments

cc: Michael Abraczinskas, NCDAQ
Sushma Masemore, NCDAQ
Brian Phillips, NCDAQ
Scott Davis, USEPA
Lynorae Benjamin, USEPA
William Barnette, Forsyth County Office of Environmental Assistance and Protection
Leslie Rhodes, Mecklenburg County Air Quality
David Brigman, Western Regional Air Quality Agency