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Director

December 9, 2015

Heather McTeer Toney
Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Revision to North Carolina's Clean Air Act Section 110(a)(2)(D)(i)(I) "Good Neighbor" State Implementation Plan for the 2008 Ozone Standard

Dear Ms. Toney:

I am pleased to submit this certification demonstrating that the North Carolina Department of Environmental Quality, Division of Air Quality (DAQ) has met the requirements of the Clean Air Act Section 110(a)(2)(D)(i)(I). This submittal serves as a revision to North Carolina's final certification submitted to the U.S. Environmental Protection Agency (EPA) on November 2, 2012, demonstrating compliance with Clean Air Act Section 110(a)(1) and (2) infrastructure State Implementation Plan (SIP) requirements for the 2008 ozone National Ambient Air Quality Standards (NAAQS). An exact duplicate electronic copy is being provided on a compact disk.

Through this submission, North Carolina is certifying that based on currently available emissions and air quality modeling data, emissions activities within North Carolina will not significantly contribute to nonattainment or interfere with maintenance of the 2008 ozone NAAQS in a neighboring state. Our extensive review of the EPA's 2017 modeling files posted for states' use on July 23, 2015, provides substantial evidence that the EPA's 2017 modeling analysis linking North Carolina to downwind contributions to ozone concentrations at the Essex ozone monitor in Baltimore County, Maryland is associated with inaccurate emissions inventories and deficiencies in the performance of the air quality modeling rather than a real contribution. Based on these findings, we have concluded that North Carolina does not contribute significantly to downwind air quality problems, and that North Carolina has met its Good Neighbor Provision under the Clean Air Act with respect to the 2008 ozone NAAQS.

The DAQ issued a public notice announcement on October 30, 2015, in accordance with 40 CFR 51.102, indicating that the "*Revision to the North Carolina State Implementation Plan - Demonstration that North Carolina Complies with the "Good Neighbor" Requirements of Clean Air Act Section 110(a)(2)(D)(i)(I) for the 2008 Ozone National Ambient Air Quality Standard*" was available for public comment and posted on the DAQ website for review. The public notice announcement indicated that anyone may request a public hearing.

In addition to posting on the DAQ website, the public notice announcement was sent to a number of e-mail distribution lists managed by the DAQ that includes numerous stakeholders from industry and environmental groups. The DAQ believes that sending the public notice announcement to these groups is more effective than publishing the notice 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."*

Additionally, the Rich Site Summary (RSS) feed on the DAQ website offers regular delivery to persons interested in receiving updates to the website content. The document was also made available for review during normal business hours at the DAQ Central Office in Raleigh and the DAQ's seven Regional Offices throughout the state.

The public comment period was open from October 30, 2015 through November 30, 2015. The DAQ did not receive any requests for a public hearing or any comments from the public. The EPA provided a letter noting that the EPA will review the comments that the DAQ submitted on the EPA's July 23, 2015 notice titled, *"Notice of Availability of the Environmental Protection Agency's Updated Ozone Transport Modeling Data for the 2008 Ozone National Ambient Air Quality Standard."* The EPA also noted that it will review public comments submitted on the EPA's November 16, 2015, proposed action titled, *"Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS"* to address the Clean Air Act "Good Neighbor" requirements for the 2008 8-hour ozone NAAQS. The EPA states that it will carefully consider the concerns that the DAQ has identified regarding the EPA's transport modeling and will assess whether updates are needed before taking any final action on this submission.

This certification is accompanied with six attachments that provide additional supporting documentation. The EPA's preliminary 2018 transport assessment is provided in Attachment A. The EPA's revised 2017 transport assessment and the DAQ's comments on this assessment are provided in Attachment B. Attachments C and D present back-trajectory analyses for the Essex ozone monitor in Baltimore County, Maryland and back-trajectory analyses for ozone exceedances that occurred in the Ozone Transport Region between April 1, 2011 and June 15, 2015, respectively. Attachment E contains the DAQ's review comments submitted to the EPA regarding the Integrated Planning Model results (version 5.13) that the EPA used in its ozone transport assessment for 2017. The public notice and EPA's letter are provided in Attachment F.

If you should have any questions regarding this submittal, please contact Sushma Masemore of my staff at (919) 707-8700.

Sincerely,



Sheila C. Holman, Director
Division of Air Quality, NCDEQ

Heather McTeer Toney

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Attachments

cc: Michael Abraczinskas, NCDAQ
Sushma Masemore, NCDAQ
Randy Strait, NCDAQ
Scott R. Davis, USEPA
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William Barnette, Forsyth County Office of Environmental Assistance and Protection
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