

US EPA ARCHIVE DOCUMENT



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

Michael F. Easley, Governor

William G. Ross, Jr., Secretary  
B. Keith Overcash, P.E., Director

July 14, 2004

James I. Palmer, Jr., Esq.  
Regional Administrator  
U.S. EPA, Region IV  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-3104

RE: Request to Classify Greensboro/Winston-Salem/High Point area as Marginal for 8-hour Ozone

Dear Mr. Palmer:

Pursuant to Section 181 (a) (4) of the Clean Air Act, I formally request that the Greensboro/Winston-Salem/High Point (Triad) area's nonattainment classification for 8-hour ozone be adjusted from moderate to marginal. The 2001 – 2003 design value for this area is 0.093 ppm, well within five percent of the marginal/moderate threshold, a requirement of Section 181 (a) (4).

There are nine monitors in the Triad area. Of these monitors, only two have design values above the marginal/moderate threshold of 0.092 ppm, Cooleemee (0.093 ppm) located in Davie County and Hattie Avenue (0.093 ppm) located in Forsyth County. One of the monitors in the area is attaining the 8-hour ozone standard and the remaining six monitors range from 0.085 to 0.089 ppm, all within the marginal classification range.

The design values for two monitors that determine the nonattainment classification for the area have steadily decreased since 1998, from 0.098 to 0.093 ppm for Cooleemee and from 0.097 to 0.093 ppm for Hattie Avenue. This reduction is in part because North Carolina has begun implementing emission reduction strategies in the area. I believe that this trend will continue and the area will be attaining the standard at all of its monitors within a few short years. These emission reduction strategies include our expanded inspection and maintenance program, going from nine counties to 48 counties phased in through January 1, 2006, and our Clean Smokestacks Act, adopted in 2002, that will reduce emissions from power plants significantly over the next few years. Additionally, this area is participating in the Early Action Compact program and community leaders and area businesses are working together and making commitments to further reduce the emissions in the area.

One of the considerations for adjusting the classification of an area is the number of exceedances of the National Ambient Air Quality Standard (NAAQS). In 2003, the Cooleemee and Hattie Avenue monitors had only four and five exceedances, respectively. Although 2003 was a cool summer, even during the drought conditions of 2002, these two monitors only had 15 (Hattie Avenue) and 22 (Cooleemee) exceedances.

Another consideration for adjusting the classification of an area is the level of pollution transport between the area and other affected areas, including both intrastate and interstate transport. There are three areas near the Triad nonattainment area that are violating the 8-hour ozone NAAQS; Raleigh/Durham/Chapel Hill, NC (Triangle) area, Hickory/Morganton/Lenoir, NC (Unifour) area, and Charlotte/Gastonia/Rock Hill, NC-SC (Charlotte) area. I believe that the Triad area is undertaking appropriate measures to address transport of pollution to its neighboring urban areas. In fact, recent air quality modeling suggests that two of these areas (Triangle and Unifour) will attain the 8-hour ozone standard by 2007.

As for the Charlotte area, it is believed that this area is impacting the Triad area on most high ozone days, and not the other way around. The prevailing winds tend to be from the southwest during the ozone season, and analysis has shown that on the highest ozone days at the Cooleemee monitor, the ozone comes from Charlotte area. Additionally, preliminary modeling shows that the Charlotte area will be attaining the 8-hour ozone NAAQS by the 2010 attainment date.

The modeling analysis mentioned above is presented in the Triad Area's June 30, 2003 status report and attached herein. The emissions trends can be found on page 10 of the report. The emissions data shows an expected decrease in NOx emissions of about 382 tons per day between 2000 and 2007. Further NOx emissions reductions are expected beyond 2007 due to implementation of Federal, State and local control measures. The VOC emissions will decrease by 20 tons per day between 2000 and 2007. Again, further reductions are expected beyond 2007. The modeling results are presented on pages 13 through 16 of this report. All monitors are expected to attain by 2007. Further details on this modeling analysis are available in previous Triad Area EAC status reports, and will be presented as part of the Triad EAC SIP to EPA in December 2004.

North Carolina is committed to conserving and protecting our natural resources and maintaining a high quality environment for the health, well-being and benefit of all. We believe that improving air quality is critical to the health of our citizens and that our future growth, prosperity and quality of life will be threatened if we do not remain diligent. With the rules and legislation that North Carolina has already enacted, I believe that the Triad area will attain the 8-hour ozone NAAQS without having to implement the control measures prescribed by the moderate classification. It is because of North Carolina's demonstrated commitment to air quality that I request you to consider adjusting the Triad area's nonattainment classification from moderate to marginal.

Please contact Sheila Holman at (919) 715-0971 should you have any questions regarding this request.

Sincerely,

B. Keith Overcash, P.E.

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cc: Secretary Bill Ross  
Brock Nicholson  
Sheila Holman  
Bob Fulp