



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue  
Governor

Dee Freeman  
Secretary

December 16, 2010

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

Re: North Carolina's Recommendations for Air Quality Designations  
for the Nitrogen Dioxide Standard

Dear Ms. Fleming:

I am writing on behalf of Governor Beverly E. Perdue to recommend air quality designation status and related boundaries of areas in North Carolina for the national ambient air quality standard (NAAQS) for nitrogen dioxide (NO<sub>2</sub>), pursuant to Section 107(d)(1)(A) of the Clean Air Act as amended.

The United States Environmental Protection Agency (USEPA) is requiring monitoring in urban areas with a population greater than or equal to one million people to assess community-wide concentrations. In North Carolina, community scale monitoring will be required in Charlotte and Raleigh. A community scale NO<sub>2</sub> monitor is currently operating in Charlotte (Mecklenburg County) and has a design value of 49.3 parts per billion (ppb). Additionally, a community scale NO<sub>2</sub> monitor is operating in Winston-Salem (Forsyth County) with a design value of 54.3 ppb. Both of these monitors are well below the new 1-hour NO<sub>2</sub> standard of 100 ppb.

The USEPA is also requiring monitoring near a major road in urban areas with a population greater than or equal to 500,000 people. The North Carolina Division of Air Quality (NCDAQ) currently does not operate any roadside NO<sub>2</sub> monitors, but anticipates that roadside monitoring will be required in four areas: Charlotte, Durham (Durham County), Greensboro (Guilford County) and Raleigh (Wake County).

Based on the available monitoring data, North Carolina recommends that Forsyth and Mecklenburg Counties be designated as attainment. Monitoring will not be established in Durham, Guilford and Wake Counties until 2013. Since monitoring data will not be available from those monitors until 2016, North Carolina recommends that these counties, as well as all other counties in the state, be designated as attainment/unclassifiable.

Gwen Keyes Fleming  
December 16, 2010  
Page 2

Like many states, North Carolina faces a challenging budget situation due to the economic downturn. At the same time, the North Carolina Division of Air Quality anticipates additional program costs associated with establishing the new NO<sub>2</sub> monitoring network, meeting monitoring requirements for the new lead NAAQS, complying with ozone monitoring requirements and replacing an aging fleet of ozone monitors. NCDAQ has already been required to expend significant state resources to implement and enforce the area source generally available control technology (GACT) regulations. Implementation of climate change regulations will create another demand on program resources in the near future.

North Carolina, like many other states, will be hard-pressed to meet all of these new requirements without additional federal support. We believe that the USEPA needs to fund the cost of implementing the NO<sub>2</sub> monitoring requirements by making Section 103 grant monies available for that purpose. In the current budget environment, the NCDAQ will not be able to meet the matching fund requirements for Section 105 grant monies.

North Carolina is committed to protecting the health of our citizens and solving our air quality problems. We believe that improving our 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. We look forward to continuing to work with the USEPA to establish appropriate boundaries for nonattainment areas and a sufficient monitoring network.

Sincerely,

A handwritten signature in cursive script that reads "Dee Freeman". The signature is written in dark ink and is positioned above the printed name.

Dee Freeman

DF/lab

cc: The Honorable Beverly E. Perdue  
Ms. Sheila C. Holman  
Mr. Jamie Kritzer  
Mr. Dick Schutt