



## North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

February 22, 2005

Mr. James I. Palmer, Jr.  
Regional Administrator  
U.S EPA, Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303

RE: PM<sub>2.5</sub> Non-attainment Designations

Dear Mr. Palmer:

In the January 5, 2005 Federal Register notice on PM<sub>2.5</sub> non-attainment boundaries, EPA indicated that State submittal of complete, quality assured, certified 2004 data for the purpose of showing a change in the non-attainment boundary was appropriate. Therefore, North Carolina would like to provide the data for the three counties that were designated as non-attainment for PM<sub>2.5</sub>: Catawba, Davidson, and Guilford<sup>1</sup>; and to request that Guilford be re-designated as attainment.

Despite the fact that the Guilford County monitor attained the PM<sub>2.5</sub> standard with a 2001-2003 design value of 14.0  $\mu\text{g}/\text{m}^3$ , a value significantly below the ambient standard, this county was designated as non-attainment. The 2002-2004 data show a design value of 13.7  $\mu\text{g}/\text{m}^3$ , which demonstrates that the air quality in Guilford County is well below the NAAQS. As I stated in earlier correspondence on the PM<sub>2.5</sub> non-attainment boundary issue, I believe that Guilford County should be designated attainment. We have indicated previously our reasons why we believe including Guilford

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<sup>1</sup> Catawba County's monitor is located in Hickory. The 2001-2003 design value for this monitor is 15.5 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). The 2002-2004 design value for this monitor is 15.1  $\mu\text{g}/\text{m}^3$ . North Carolina had anticipated this area would attain the PM<sub>2.5</sub> standard with the 2004 data. The values are very close to the PM<sub>2.5</sub> standard, but unfortunately still violating. However, North Carolina believes it is likely that this area will attain with the 2005 data. North Carolina will begin work on the re-designation package as early as September 2005. We request that if EPA intends to issue re-designation guidance, that this be accomplished by mid-2005 so that the guidance is available when we are beginning the re-designation process. In any event, we intend to consult with EPA early in the process in order to ensure that our request can be processed as quickly as possible.

The Davidson County monitor has a similar downward trend in PM<sub>2.5</sub> values. The 2001-2003 design value for the Lexington site is 15.8  $\mu\text{g}/\text{m}^3$ . The 2002-2004 design value for this site is 15.4  $\mu\text{g}/\text{m}^3$ . Again, while this site did not attain the PM<sub>2.5</sub> standard, the value is still on a downward trend. We are hopeful that air quality will continue to improve in Davidson County and the Lexington monitor will attain the PM<sub>2.5</sub> standard with the inclusion of 2005 data. If so, we intend, as with Catawba County, to seek expeditious re-designation of the area. We reiterate that, if EPA intends to issue re-designation guidance, it should release such guidance before September 2005.

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County in the non-attainment area is arbitrary and unlawful. I request that you again review my September 8, 2004 letter, in light of the fact that the design value in Guilford continues to be well below the standard.

From our previous comments, I reiterate that, while the mobile source emissions in Guilford County are greater than in other counties in this area, mobile source emissions will continue to decrease through implementation of federal rules addressing mobile sources as well as the expanded North Carolina motor vehicle inspection program. The mobile emissions will also decrease due to local measures included as part of the Early Action Compact (EAC) effort in the Triad. The most direct influence of these reductions will be reduced ambient concentrations in Guilford County at the monitor already demonstrating compliance with the  $PM_{2.5}$  standard.

Unfortunately for the citizens of Guilford County, EPA has reached the puzzling conclusion that sources in this attaining county are contributing to pollution in another county which lies in a direction opposite the prevailing winds. This conclusion is supported neither by the facts nor reason, and therefore I ask that it be withdrawn. The EPA analysis appears to rely primarily on the fact that Guilford County has a relatively larger and more urban population and produces relatively larger quantities of  $PM_{2.5}$  and  $PM_{2.5}$  precursors. But EPA fails to adequately consider that, for example, Guilford County's air quality complies with the  $PM_{2.5}$  NAAQS and, indeed, is improving with respect to the pollutant  $PM_{2.5}$ . The only evidence shows that federal, state, and local controls already in place continue to reduce  $PM_{2.5}$  concentrations in Guilford County and surrounding counties. While we share a common interest in assuring clean air in Davidson County, it is entirely unclear what additional measures you would recommend be imposed and how those measures would have a meaningful impact on air quality in Davidson County.

EPA's own data indicate that regional sources account for a great deal of the elevated  $PM_{2.5}$  levels in the east and southeast. For this reason, EPA has in fact proposed to find that power plant emissions throughout the region should be regulated -- by the Clean Air Interstate Rule. All available data and analysis indicate that a non-attainment designation for Guilford County will have little if any effect on the  $PM_{2.5}$  levels in Davidson County, and whatever effect it does have will be dwarfed by other emissions reductions programs. A more sensible approach would be to require significant regional emission reductions from large sources in the near term, which would help both Davidson County and Catawba County attain and then maintain the  $PM_{2.5}$  standard. I ask that EPA not penalize Guilford County for a problem that it can do little if anything to rectify.

North Carolina is proud to be a leader in the improvement of air quality and is committed to the continued improvement of air quality within its borders. Part of our successful strategy in North Carolina has been the deployment of our limited resources in an efficient manner. Unfortunately, the designation of Guilford County as nonattainment will result in the expenditure of unnecessary resources in an area that has already

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demonstrated compliance with the NAAQS. I want to see all areas of the State attain the PM<sub>2.5</sub> standard as quickly as possible. I trust that these comments will be considered as EPA moves forward with implementation of the PM<sub>2.5</sub> standard.

Sincerely,



William G. Ross, Jr.

cc: Secretary Lyndo Tippet  
Secretary James Fain  
Keith Overcash