



NORTH CAROLINA
Environmental Quality

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Director

November 9, 2022

Daniel Blackman, Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Pre-Hearing Draft of Supplement III to the Revised Maintenance Plan for the Charlotte-Gastonia-Salisbury, North Carolina 2008 8-Hour Ozone Marginal Nonattainment Area

Dear Mr. Blackman:

I am pleased to submit the pre-hearing draft of *Supplement III to the Revised Maintenance Plan for the Charlotte-Gastonia-Salisbury, North Carolina 2008 8-Hour Ozone Marginal Nonattainment Area*. The purpose of this supplement is to request United States Environmental Protection Agency's (USEPA) approval to increase the amount of safety margin allocated to the motor vehicle emission budgets (MVEBs) contained in the July 16, 2020, State Implementation Plan (SIP) revision for the Charlotte-Gastonia-Salisbury area. Enclosed are a clean and markup copy of the supplement package uploaded into the USEPA's State Planning Electronic Collaboration System (SPeCS) for SIPs interface for your staff to review.

Transportation conformity in the Charlotte-Gastonia-Salisbury, North Carolina 2008 8-Hour Marginal Nonattainment Area ensures that federal transportation actions do not interfere with maintaining compliance with the 2008 8-hour ozone standard. As such, the level of emissions estimated for Transportation Improvement Programs and Metropolitan Transportation Plans must not exceed the MVEBs as defined in the area's maintenance plan. Historically, the North Carolina Division of Air Quality (DAQ) has allocated no more than 50% the total safety margin to the MVEBs for nitrogen oxides (NO_x) and volatile organic compounds (VOC) to ensure on-going attainment of the ozone National Ambient Air Quality Standards (NAAQS). In this submittal, North Carolina is proposing to increase the amount of the total safety margin allocated to the 2026 MVEBs from 9.4% to 21.4% for NO_x and from 37.4% to 49.7% for VOC.

The proposed revisions to the 2026 MVEBs will accommodate updates to the Motor Vehicle Emissions Simulation (MOVES) model (released January 2021) used to calculate onroad emissions of NO_x and VOCs in the Charlotte area. The revisions do not exceed the 50 percent allocation of the total available NO_x or VOC safety margin emissions. In addition, the Charlotte-Gastonia-Salisbury area is currently attaining the 2008 and 2015 8-hour ozone NAAQS based on ambient monitoring data collected through October 31, 2022. Therefore, the DAQ concludes that the proposed revisions to the MVEBs will not interfere with any applicable requirement concerning the attainment and maintenance of the NAAQS.



To appropriately supplement the July 16, 2020 SIP package, the DAQ requests that your staff review and approve the revised pages of the clean copy as outlined in the tables below:

Narrative Section	Narrative Page
Cover Page	Not Applicable
Preface	pp. i
Executive Summary	pp. iii, iv, and viii
Table of Contents	pp. xi
3.4 Emissions Inventories and Maintenance Demonstration	pp. 32, 33, 38, 39, 40, 41, and 42
4.0 Motor Vehicle Emissions Budgets for Conformity	pp. 47, 49, and 50
Footer	All Pages with a Footer

Appendices Section	Appendix Page
Appendix A	
Cover Page	Not Applicable
Table of Contents	pp. i, ii, and iii
1.0 Introduction and Scope	p. 1
2.1 Interagency Consultation	p. 2
2.4 Emissions Modeling Approach	p. 4
4.2 MOVES Model Inputs	5
4.2.1 On-road Vehicle Speed Data	pp. 5, 7, 8, 9, 10, 11, 12, and 13
4.2.3 Vehicle Mix Data	p. 19
4.2.14 VMT Data	pp. 24, 26, 27, 28, 29, 30, 31, and 32
4.3 Estimated Emissions from On-road Mobile Sources	p. 33
4.4 Motor Vehicle Emissions Budgets for Conformity	pp. 34, 35, 36, 37, and 38
5.1 Vehicle Mix Data	p. 43
5.3 MOVES Modeling Data Files	pp. 45, 46, and 47
Footer	All Pages with a Footer
Appendix B	All New Pages

The DAQ will issue a public notice announcement, in accordance with 40 CFR 51.102, indicating that the pre-hearing draft of *Supplement III to the Revised Maintenance Plan for the Charlotte-Gastonia-Salisbury, North Carolina 2008 8-Hour Ozone Marginal Nonattainment Area*, is available for public comment and is posted on the DAQ website for review. The public notice announcement will indicate that anyone may request a public hearing. A public hearing will be scheduled if requested. A separate notice will be announced for the hearing including the date, time, location, and other details. The public comment period will be open from Wednesday, November 9, 2022 through Monday, December 12, 2022. The DAQ intends to submit a final version of this pre-hearing draft for incorporation into North Carolina's SIP through the USEPA's SPeCS web-based system after considering relevant public comments.

In addition to posting on the website, the public notice announcement will be sent to a number of email distribution lists managed by the DAQ, which will include numerous stakeholders from industry and environmental groups. The DAQ believes that sending the public notice announcements 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 the State Implementation Plan Submittals and the Use of Letter Notices.*" Upon making an appointment consistent with the Department of Environmental Quality's policy during the COVID-19 pandemic, the document will also be made available for in person review during normal business hours at the DAQ Central Office in Raleigh and the DAQ Regional Office in Mooresville.

If you should have any questions, please contact Randy Strait of my staff at (919) 707-8721 or randy.strait@ncdenr.gov.

Sincerely,

A handwritten signature in blue ink, reading "Michael A. Abraczinskas". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

MAA/tkm

Enclosure

cc: Taylor Hartsfield, DAQ
Randy Strait, DAQ
Evan Adams, USEPA
Lynorae Benjamin, USEPA
Sarah Larocca, USEPA
Dianna Myers, USEPA
Jane Spann, USEPA
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