

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

September 27, 2013

Ms. Sheila C. Holman, Director North Carolina Department of Environment and Natural Resources Division of Air Quality 1641 Mail Service Center Raleigh, North Carolina 27699-1641

Dear Ms. Holman:

Thank you for your letter dated August 23, 2013, transmitting a prehearing package regarding the supplement to the Inspection and Maintenance (I/M) Program in North Carolina. These revisions were the subject of a public comment period beginning August 23, 2013, with written comments due by the close of business on September 27, 2013. We have completed our review of the prehearing submittal and offer one comment in the enclosure.

We look forward to continuing to work with you and your staff. If you have any questions, please contact Ms. Lynorae Benjamin, Chief, Regulatory Development Section at (404) 562-9040, or have your staff contact Nacosta C. Ward at (404) 562-9140.

Sincerely,

R. Scott Davis

Chief

Air Planning Branch

**Enclosure** 



## Enclosure - Supplement to the North Carolina I/M Program - Narrative

Page 13 (pg. 17 of document): K. WAIVERS AND COMPLIANCE VIA DIAGNOSTIC INSPECTION (40 CFR §51.360)

- Section 1 discusses waiver rates and potential corrective action if the waiver rate goes above 5%. One possibility noted is to increase the exemptions as noted in, "Corrective strategies considered may include: not issuing waivers on vehicles under 6 years of age increased education for issuing personnel, raising minimum expenditure limits, utilizing a sliding scale (exempting vehicles older than the last 10 to 15 years of age)..."
  - 1. North Carolina states that a "sliding scale" will be utilized, however, this reference is unclear. Please explain if this scale is based upon vehicle age and repair cost.