



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Sheila C. Holman
Director

John E. Skvarla, III
Secretary

Pat McCrory
Governor

March 27, 2013

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

Subject: Supplement to the Redesignation Demonstration and Maintenance Plan for
Raleigh-Durham-Chapel Hill, NC 1997 8-hour Ozone Nonattainment Area

Dear Ms. Fleming:

I am pleased to submit the Supplement to the Redesignation Demonstration and Maintenance Plan for Raleigh-Durham-Chapel Hill, NC (Triangle) 1997 8-hour Ozone Nonattainment Area. Enclosed is one hard copy of the complete package containing the supplement to the redesignation demonstration and maintenance plan, as well as the supporting documentation as to how the emission estimates were developed and an exact duplicate electronic copy on compact disk. The disk includes the on-road mobile model input and output files.

In this supplement, the North Carolina Division of Air Quality (NCDAQ) is requesting the United States Environmental Protection Agency (USEPA) relax the current 7.8 pounds per square inch (psi) Reid Vapor Pressure (RVP) requirement for three Triangle counties subject to the summertime gasoline volatility standard contained in 40 CFR 80.27(a)(2). Approval of this request will enable 9.0 psi gasoline to be distributed in the entire Triangle area throughout the year. The current requirement of 7.8 psi RVP standard results in higher fuel cost that adversely affects businesses and consumers.

An in-depth analysis performed by the NCDAQ indicates that relaxation of the RVP standard in the Triangle maintenance area does not interfere with the attainment of National Ambient Air Quality Standards (NAAQS). Air quality data for the most recent three year period (2010-2012) demonstrate that the Triangle maintenance area has continued to maintain the 1997 and the 2008 8-hour ozone standards. The area also continues to meet the NAAQS for all other criteria air pollutants.

This supplement shows that even with the relaxation of summertime RVP standard, future emission inventories are expected to be lower than the attainment year inventory and a large safety margin is available to accommodate the removal of certain control options that provide minimal benefit. Based on this review of Clean Air Act Section 110(l) requirements, the NCDAQ has demonstrated that requiring the existing 7.8 psi RVP gasoline standard is unnecessary to maintain the ozone NAAQS in the Triangle area, and that the RVP relaxation will not interfere with attainment of other NAAQS.

This supplement also includes revisions to emission inventory methods due to changes in USEPA mobile models. The on-road motor vehicle emission budgets (MVEBs) and future year emissions inventories have been updated with the latest USEPA Motor Vehicle Emissions Simulator (MOVES)

1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, Raleigh, North Carolina 27603
Phone: 919-707-8401 / Fax: 919-715-0718
Internet: www.ncair.org

mobile model. In the original redesignation demonstration and maintenance plan, the MVEBs were established with the previous mobile model, MOBILE6.2. Similarly, the NONROAD2005c mobile model used in the previous plan to calculate non-road mobile source emissions has been replaced with the current NONROAD2008a mobile model. The non-road mobile emissions inventory also includes general conformity analysis for two new nuclear generating units at the Duke-Progress Energy Company in Wake County.

The NCDAQ issued a public notice announcement indicating that the Supplement to the Redesignation Demonstration and Maintenance Plan for Raleigh-Durham-Chapel Hill, NC 1997 8-hour Ozone Nonattainment Area documentation was available for public comment and is posted on the NCDAQ website for review. The comment period opened on Wednesday, February 6, 2013 and closed on Friday, March 15, 2013. The public notice announcement was sent to a number of distribution lists managed by the NCDAQ. The distribution lists included numerous stakeholders from industry, environmental groups and transportation partners. The NCDAQ believed that sending the public notice announcement to these groups was 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 State Implementation Plan Submittals and the Use of Letter Notices." Additionally, the NCDAQ website has Rich Site Summary (RSS) feed which regularly delivers changes to the website content to those that have signed up for it.

The public notice announcement also indicated that the public may request a public hearing. The NCDAQ did not receive a request for a public hearing. The USEPA submitted a letter and offered no comments at this time. The North Carolina Petroleum and Convenience Marketers (NCPCM) submitted a letter requesting the USEPA to grant the enforcement discretion requested by the NCDAQ – Department of Environment and Natural Resources on behalf of the Governor of North Carolina, citing the need to meet upcoming gasoline supply schedule. The NCPCM also noted that the price difference between 7.8 and 9.0 psi RVP gasoline has escalated to an average of 9.4 cents per gallon during the past two summers. Copies of letters submitted by the USEPA and NCPCM are provided in Appendix D - Public Notice Report.

The NCDAQ recognizes the importance of relaxing the RVP standard in Wake, Durham and Granville counties, and is requesting the USEPA to parallel process the public notices related to the SIP submission and the federal RVP gasoline standard rulemaking. If you should have any questions, please contact Sushma Masemore of my staff at (919) 707-8700 or sushma.masemore@ncdenr.gov.

Sincerely,



Sheila C. Holman

SCH/et

Attachments

cc: Michael Abraczinskas, NCDAQ
Sushma Masemore, NCDAQ
Scott Davis, USEPA
Lynorae Benjamin, USEPA