



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

October 15, 2009

A. Stanley Meiburg
Acting 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 Lead Standard

Dear Mr. Meiburg: *Stan*

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 lead, pursuant to Section 107(d)(1)(A) of the Clean Air Act as amended.

The North Carolina Division of Air Quality (NCDAQ) currently does not operate any lead monitors. However, the NCDAQ has analyzed lead concentrations in fine particulate matter samples since 1999 and the lead concentrations have always been well below the recently promulgated lead NAAQS. On average, the lead concentrations are below 0.015 micrograms per cubic meter or one tenth of the standard. Although the standard is based on total suspended particulate matter, we believe that the analysis of the fine particulate matter is an indicator that North Carolina is attaining the lead NAAQS. Therefore, it is North Carolina's recommendation that all counties in North Carolina be designated as attainment/unclassifiable.

The USEPA is requiring fence line monitoring for facilities that emit more than one ton of lead per year to be installed and operational by January 1, 2010. To determine potential facilities that may require fence line monitoring, the USEPA is using the 2005 National Emission Inventory (NEI) and the 2007 Toxic Release Inventory (TRI). The 2005 NEI does not indicate any facilities in North Carolina with annual lead emissions over one ton. The 2007 TRI indicated three facilities in North Carolina with lead emissions that exceed one ton per year: International Resistive Company, Nucor Steel, and Progress Energy Roxboro Steam Station. The NCDAQ has requested waivers for all three facilities for the following reasons.

- International Resistive Company is located in Boone, NC, and had lead emissions reported to the 2007 TRI of 1.60 tons per year. The facility made an error in calculating its lead emissions. The correct emissions for this facility are 492 pounds per year.
- Nucor Steel is located in Cofield, NC, and the TRI reported that the facility emitted 6.06 tons per year. This was a transcription error that was corrected in the TRI database on May 12, 2009. The actual amount of lead emitted by Nucor Steel is 120 pounds per year.

- Progress Energy's Roxboro Steam Station is located in Semora, NC, and the TRI reported 1.00 ton per year of lead for this facility. In 2007 and 2008, Progress Energy installed scrubbers at the Roxboro Steam Station. The facility submitted documentation to the NCDAQ indicating that the potential lead emissions with the scrubbers operational will be 154 pounds per year.

Therefore, North Carolina has recommended that no fence line monitoring be conducted based on annual lead emissions from the facilities in the State.

The USEPA is requiring population exposure monitoring in urban areas with populations greater than 500,000 to be installed and operational by January 1, 2011. The NCDAQ anticipates population exposure monitoring will be required in four Metropolitan Statistical Areas: Charlotte, Durham-Chapel Hill, Raleigh-Cary, and Greensboro. The NCDAQ is waiting on the USEPA to release additional guidance for siting these monitors before securing locations for the population exposure monitors.

Like many states, North Carolina is in difficult financial condition due to the current economic situation. In addition to expected costs associated with establishing the new lead monitoring network, the NCDAQ also has to determine how to fund the additional monitoring requirements proposed in the ozone monitoring rule and the proposed nitrogen dioxide NAAQS. Furthermore, the NCDAQ is expending resources to implement and enforce the area source maximum achievable control technology (MACT) and generally available control technology (GACT) regulations, not to mention the expected resources that will be needed for the climate change regulations that are on the horizon. The various new requirements and shrinking funds are placing the NCDAQ in a position where it cannot afford to implement all of the new monitoring requirements. Therefore, the USEPA needs to fund the cost of implementing the lead monitoring requirements. These funds need to be in the form of Section 103 grant monies rather than the use of Section 105 grant monies. In the current financial situation the NCDAQ cannot 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 monitor network.

Sincerely,



Dee Freeman

DF/lab

cc: The Honorable Beverly E. Perdue
Mr. Keith Overcash
Mr. Jamie Kritzer
Mr. Dick Schutt