



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

February 2, 2011

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

Dear Ms. Holman:

Thank you for the December 22, 2010, supplement to the December 18, 2009, maintenance plan submittal for the Greensboro/Winston-Salem/Highpoint (Triad), North Carolina 1997 annual fine particulate matter (PM<sub>2.5</sub>) nonattainment area. This supplement replaces the Mobile6.2 sub-area motor vehicle emissions budgets (MVEBs) with Motor Vehicle Emissions Simulator (MOVES) based sub-area MVEBs for nitrogen oxides (NO<sub>x</sub>) and direct PM<sub>2.5</sub>. The Triad area is comprised of the entire counties of Guilford and Davidson.

Pursuant to Section 93.118(e)(4) of the Transportation Conformity Rule (40 CFR Part 93, Subpart A), the U.S. Environmental Protection Agency (EPA) has reviewed North Carolina's supplemental information for the MOVES based NO<sub>x</sub> and direct PM<sub>2.5</sub> sub-area MVEBs in the Triad area. We have determined that the supplemental information with the MOVES based sub-area MVEBs for Guilford and Davidson counties, North Carolina are adequate for transportation conformity purposes.

North Carolina's 1997 annual PM<sub>2.5</sub> maintenance plan supplement has 2011 and 2021 MOVES sub-area MVEBs. The sub-area MVEBs are presented in the table below.

**Triad, North Carolina Annual PM<sub>2.5</sub> MVEBS**  
[kilograms/year]

<b>Guilford County Sub-area MVEB</b>		
	<b>2011</b>	<b>2021</b>
NO <sub>x</sub>	11,133,605	6,309,650
PM <sub>2.5</sub>	421,841	421,841
<b>Davidson County Sub-area MVEB</b>		
	<b>2011</b>	<b>2021</b>
NO <sub>x</sub>	4,086,413	2,148,938
PM <sub>2.5</sub>	153,313	153,313

These MVEBs meet the standard requirement that any MVEBs must meet before it can be used to determine conformity for a transportation improvement program or long range transportation plan. This adequacy finding does not relate to the merits of the SIP submittal nor does it indicate whether the submittal meets the requirements for approval.

EPA opened a comment period on the adequacy of the NO<sub>x</sub> and direct PM<sub>2.5</sub> sub-area MVEBs contained in the Triad, North Carolina PM<sub>2.5</sub> maintenance plan supplement by posting it on our website on November 23, 2010 (See [www.epa.gov/otaq/transp/conform/adequacy.htm](http://www.epa.gov/otaq/transp/conform/adequacy.htm)). The comment period closed on December 23, 2010. No comments were received during EPA's adequacy comment period.

More information on SIPs and adequacy reviews is available on the EPA web site. EPA will soon publish a notice in the Federal Register announcing this adequacy finding. The Federal Register will also announce the date that the adequacy finding becomes effective. The 2011 and 2021 sub-area MVEBs will be available for use on the effective date.

EPA has considered these sub-area MVEBs in light of the current status of the Clean Air Interstate Rule (CAIR). The District of Columbia (D.C.) Circuit Court issued a decision on July 11, 2008, vacating CAIR. North Carolina v. EPA, 531 F.3d 896 (D.C. Cir. 2008). On September 24, 2008, EPA and other parties in the case filed motion for rehearing asking the D.C. Circuit to reconsider its decision in the case. On December 23, 2008, the court granted EPA's motion for rehearing and remanded CAIR to EPA for further rulemaking consistent with the courts' July 11, 2008, opinion. However, the court did not vacate CAIR in that decision; thus, the CAIR rule remains in place.

On August 2, 2010 (75 FR 45210), EPA proposed the Air Pollution Transport Rule (Transport Rule) as a replacement for the remanded CAIR rule. EPA anticipates finalizing the Transport Rule in June 2011. EPA has reviewed these sub-area MVEBs in light of the remand of the CAIR rule and the proposed Transport Rule and has concluded that the budgets meet the conformity rule's adequacy criteria found at 40 CFR 93.118(e)(4). In particular, EPA has concluded that the budgets satisfy the requirements of 40 CFR 93.118(e)(4)(iv), which requires that the budget(s), when considered together with all other emissions sources, is consistent with applicable requirements for, reasonable further progress, attainment or maintenance (whichever is relevant to the given implementation plan submission). EPA bases this conclusion on the overall declining emissions from all sources in the nonattainment area, and the current state of air quality.

If you have any questions, please feel free to call Richard A. Schutt of the EPA Region 4 staff at (404) 562-9033 or myself at (404) 562-9326.

Sincerely,



Beverly H. Banister  
Director  
Air, Pesticides, and Toxics  
Management Division