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April 29, 2010

**CERTIFIED MAIL**

A. Stanley Meiburg, Acting Regional Administrator  
U.S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8909

**Re: South Carolina Air Quality Implementation Plan  
8-Hour Ozone Attainment Demonstration for the Rock Hill-Fort Mill Area Transportation  
Study Metropolitan Planning Organization**

Dear Dr. Meiburg:

Please find attached a revised South Carolina attainment demonstration for the York County portion of the Charlotte-Gastonia-Rock Hill NC-SC 8-Hour Ozone (Metrolina) Nonattainment Area. This attachment contains the previously submitted attainment demonstration for the York County portion of the Metrolina nonattainment area, along with the supplemental information required by the United States Environmental Protection Agency (EPA) for approvability.

Sections 172(c), 182(a), and 182(b) of the CAA prescribe the requirements for ozone nonattainment areas. All designated nonattainment areas must comply with the general requirements mandated by Section 172(c) of the CAA. As a Subpart 2, moderate ozone nonattainment area, the Metrolina area must also meet the additional requirements prescribed by Section 182 of the CAA. Each state in which all or part of a moderate nonattainment area is located shall make the submissions described under Section 182(a) (relating to marginal nonattainment areas) and shall also submit the revisions to the applicable implementation plan described under Section 182(b) with respect to moderate nonattainment areas. The South Carolina Department of Health and Environmental Control (Department) believes it has, through the measures outlined in the enclosed 8-Hour Ozone Attainment Demonstration for the Portion of York County, SC Within the Rock Hill-Fort Mill Area Transportation Study (RFATS) Metropolitan Planning Organization (MPO), fulfilled these requirements.

This attainment demonstration was first submitted on August 31, 2007. On November 17, 2008, the Department received correspondence from the EPA stating that the EPA could not approve the SIP attainment demonstration because it believed that the area was unlikely to attain the 1997 ozone standard by June 15, 2010 and offered the Department the option to voluntarily request a reclassification ("bump-up") to "Serious" to avoid disapproval of the SIP. As a result the Department withdrew the attainment demonstration in order to address EPA's concerns.

It is worthwhile to note that the ozone concentrations decreased, along with the design value, in 2009 to such a degree that the area did qualify to request a one-year extension of the attainment date. If the EPA had not prematurely imposed this decision upon the Department until all the information, such as the 2009 ozone data, was available to evaluate, withdrawal of the attainment demonstration, and consequently the additional burdens of revising and resubmitting, would have been avoided.

As directed by EPA, the supplement to the attainment demonstration includes:

- Attainment modeling for 2011,
- Updates to the air quality data analysis including the 2009 ambient data,
- Additional updated information on emissions and controls that would affect the air quality for the 2010 ozone season, and
- A Volatile Organic Compound (VOC) motor vehicle emissions budget (MVEB).

The Department published a Notice of General Public Interest which included an announcement of a 30-day comment period and opportunity to request a public hearing in the *State Register* on February 26, 2010. A prehearing package was submitted to the EPA on February 26, 2010. No request for a public hearing was received, and the public comment period closed on March 29, 2010. This notice, comments received, and Department response are included with this submittal as attachment 7. Pursuant to 40 CFR 51.102, no request for a public hearing was received by the close of the comment period, so the hearing scheduled for April 5, 2010, was canceled, as posted on the Department website.

RACT and Control Techniques Guidelines (CTGs) are not addressed within today's submittal. The case-by-case RACT analysis for existing sources located in the ozone nonattainment area with the potential to emit greater than 100 tons per year of NO<sub>x</sub> was submitted on August 31, 2007. Applicability determinations for Group III and Group IV CTGs were subsequently completed and negative declarations were published in the *State Register* on December 26, 2008, and May 22, 2009, respectively.

We would like to request that EPA state in its approval of the motor vehicle emissions budgets that they may be replaced in the future by new adequate budgets as provided for in 40 CFR 93.118(e)(1).

This submittal includes:

- Electronic copies of the requested supplemental information, with Appendix S.1, Attainment Test.
- The attainment demonstration executive summary and narrative, Appendix F.3 (Mobile Source Emissions), Appendix O (Reasonable Further Progress) appended with a 2008 VOC MVEB, and a discussion of the adjustments made to these original documents.
- Notice of General Public Interest, comments received and the Department's response.

A compact disk (CD) is being sent by mail which will include the entire attainment demonstration, including updates, and the requested supplemental information. The electronic copies that the Department is sending to you via email today are identical to their counterparts on the CD.

Dr. Meiburg  
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Should you or your staff have any questions or comments concerning this SIP attainment demonstration, please contact Ms. Leslie Coolidge of the Bureau of Air Quality at 803-898-3208 or via electronic mail at [coolidl@dhc.sc.gov](mailto:coolidl@dhc.sc.gov).

Sincerely,



Robert W. King, Jr., P.E.  
Deputy Commissioner  
Environmental Quality Control  
South Carolina Department of Health and Environmental Control

cc: Richard A. Schutt, Chief, Air Planning Branch, EPA Region 4  
Lynorae Benjamin, Chief, Regulatory Development Section, EPA Region 4  
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Maeve S. R. Mason, Regulation and SIP Management Section, BAQ, SCDHEC  
Keith Overcash, Director, North Carolina Department of Environment and Natural Resources, Division of Air Quality  
Laura Boothe, Attainment Planning Branch Supervisor, North Carolina Department of Environment and Natural Resources, Division of Air Quality

Attachments:

1. Supplement to the South Carolina 8-Hour Ozone Attainment Demonstration (originally submitted August 31, 2007) for the portion of York County, South Carolina within the RFATS MPO, part of the Charlotte-Gastonia-Rock Hill, NC-SC 8-Hour Ozone Nonattainment Area
2. Appendix S.1 Attainment Test
3. RFATS 8-Hour Ozone Attainment Demonstration Executive Summary and Narrative with limited revisions
4. Appendix F.3 (Mobile Source Emissions) with limited revisions
5. Appendix O (Reasonable Further Progress) amended with a 2008 MVEB
6. Discussion of adjustments made to original documents
7. Notice of General Public Interest, comments received, and the Department's response
8. Legal Authority