



County of Spartanburg

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D. GLENN BREED
COUNTY ADMINISTRATOR

L. Nelson Roberts, Jr.
S.C. DHEC - Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201

January 7, 2009

Dear Mr. Roberts:

I appreciate the time you have taken recently to discuss the attainment boundary designations with me. Please consider this letter Spartanburg County's comments on the boundary recommendations your agency is now considering.

Should DHEC choose to recommend boundaries other than those based on Core Based Statistical Areas as discussed in EPA's December 2008 guidance, we believe that those boundaries should reflect the contiguous urbanized I-85 corridor. We oppose boundary scenarios that would separate all or parts of Spartanburg County's portion of the urbanized corridor from the rest of the Greenville-Spartanburg-Anderson region.

As evidenced by numerous ongoing regional efforts, particularly the multi-county cooperatively funded effort to clarify the impact of the troublesome particulate matter monitor in the City of Greenville, Upstate local governments have approached air quality concerns with the understanding that an unavoidable level of regional intergovernmental interdependence exists. The expectation has been that although each government must act responsibly on its own initiative, air pollution recognizes no governmental boundaries and therefore our fates are somewhat intertwined on this important concern.

We understand that mobile sources (principally car and truck traffic) are among the most significant contributors to our region's ground level ozone challenges. We further recognize that attainment status will be determined based on data from just a very few monitors, and that of those monitors the one in Spartanburg County is located significantly closer to interstate 85 which represents the region's largest concentration of mobile sources. There is nothing to suggest that similarly situated monitors in counties adjacent to Spartanburg County would yield substantively different results.

The larger Upstate counties are similar in that industrial activity, commercial development, and population density are centered around the interstate corridor and the central cities and that rural areas remain to the north and south of interstate corridor. We believe that it would be far more consistent with what is known about the contributors to ground level ozone and its health affects to define attainment areas by those factors as opposed to jurisdictional lines. In the absence of more monitor data indicating that Spartanburg County's ground level ozone situation is indeed distinct from a public health perspective from similar areas a few miles down the interstate, we oppose the use of county boundaries for attainment designations.

Sincerely,

Chris Story
Assistant County Administrator