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March 12, 2009

Mr. Stan Meiburg, Acting Regional Administrator
USEPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: South Carolina Ozone NAAQS Boundary Recommendations

Dear Mr. Meiburg:

The South Carolina Department of Health and Environmental Control (Department), on behalf of Governor Mark Sanford, is submitting South Carolina's boundary recommendations for the 2008 Ozone National Ambient Air Quality Standard (Ozone NAAQS). These recommendations were derived after careful review of relevant data including South Carolina's 2006-2008 ozone monitoring data in conjunction with U.S. Environmental Protection Agency (EPA) boundary determination guidance and past boundary determinations. South Carolina will continue to review relevant information and we respectfully request the opportunity to update our submittal in response to newly available information and reserve the right to make changes to the boundary recommendations based upon this review.

The attached information includes supporting documentation for the boundary recommendations for South Carolina. It is our understanding that the EPA will review these recommendations and respond to South Carolina by December 12, 2009. We respectfully request that the EPA maintain a dialog with the Department during this review so that we may expeditiously address any issues that may arise. Further, we understand that South Carolina will have 120 days from EPA's response to formally address and to resolve any remaining concerns before final boundary determinations for South Carolina are made.

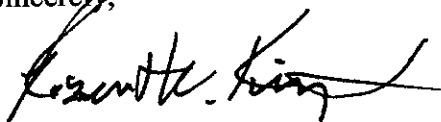
In developing these recommendations, the Department conducted public meetings in each potential nonattainment area, followed by a 30 day formal comment period and a public meeting on January 7, 2009. These efforts were intended to seek involvement and comments from the public, local officials, metropolitan planning organizations, environmental organizations, and business and industry.

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During these public meetings, numerous comments were received on the success of the Early Action Compacts (EAC), which helped South Carolina achieve the previous ozone standard before the attainment date required by the Clean Air Act. Because so many of the federal measures that are needed to improve air quality are tied up in litigation for years, we encourage EPA to support the EAC concept for the 2008 NAAQS. The EAC process will achieve the needed air quality benefits sooner than would be required under the mandatory federal timeframes. We also ask that EPA apply as much flexibility as possible in determining final boundaries for this standard in light of the current economic crisis in which the country finds itself.

We look forward to EPA's review and to providing additional information on any issues that the EPA may have with our recommended boundaries. If there are any questions, please contact Robert Brown at (803) 898-4105 or by e-mail at brownrj@dhec.sc.gov.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

cc: Richard Schutt, EPA Region 4
Myra Reece, SCDHEC Bureau of Air Quality

Attachment