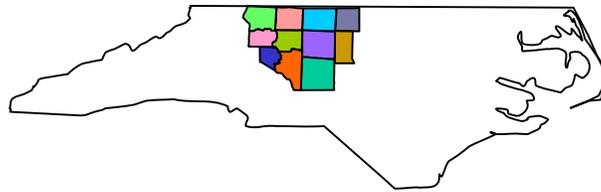


TRIAD EARLY ACTION

**TRIAD EARLY ACTION
COMPACT**

June 30, 2004 Progress Report



TRIAD EARLY ACTION COMPACT – June 30, 2004 PROGRESS REPORT

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Part A

Local and Regional Progress

1 Progress Since December 31, 2003 Regarding Development of Control Strategies and Early Action Plan

Since December 31, 2003 the Triad EAC's major initiative has been development, adoption and refinement of regional and local control strategies. These measures were submitted as part of the Triad Early Action Plan to EPA on March 31, 2004. On April 15 EPA accepted the Triad Early Action Plan as meeting the March 31 milestone, and the Triad Area's effective date of nonattainment was deferred until September 30, 2005.

By December 31, 2003 43 local governments in 11 counties had adopted resolutions incorporating the regional and local control measures. Between January 2004 and March 31, 2004 the Stakeholders group clarified, refined and, to the degree possible, quantified the strategies and agreed on implementation dates.

During this period several local measures were adopted and/or implemented: converting to biodiesel in Greensboro for all on and off road diesel vehicles; school bus diesel retrofits in Guilford County; replacement of new gasoline engines that meet California standard; building 5 Park and Ride lots (15 more to be built); elimination of coal fired boilers at RJ Reynolds; a no idling policy for Guilford county school buses; and implementation of energy efficiency in identified schools and public buildings. These measures are included in the control measures submitted to EPA

Between March 31 and June 30, 2004 EAC Stakeholders (or representatives of the Stakeholders Group) engaged in several activities related to the control measures. These are not implementation activities but they have resulted in either: a) clarification of one or more control measures, or b) identification of methods/opportunities to implement the strategies.

March 26 - Meeting in Davidson County with local officials and Division of Air Quality representatives to discuss Ozone and PM_{2.5} issues. As a result of Davidson County's participation in the EAC and its PM_{2.5} problem, considerable effort will be devoted to identification of emissions sources and reduction measures.

April 21 - Triad EAC, Piedmont Triad COG, Northwest Piedmont COG and Triangle Clean Cities Coalition co-sponsor the *Alternative Vehicles Road Show*. Morning workshop at Greensboro Coliseum; afternoon workshop in downtown Winston-Salem. (See invitation logo, following page.) This event stimulated much interest. As a result, the **Triad EAC will sponsor a Biodiesel Briefing in August for local government and private sector fleet managers** with the supplier who has the Greensboro B20 contract.

The Piedmont Triad Rural Planning Organization and
the Early Action Compact bring you



The Alternative Fuel Vehicle Road Show

The Piedmont Triad Rural Planning Organization
and
the Early Action Compact bring you
**The Alternative Fuel Vehicle
Road Show**

Plan to join us for a very special RPO meeting
April 21st
10:00 am – 11:45 am
Greensboro Colliseum Special Events Center
Greensboro, NC

June 3 - Meeting with representatives of the Southern Environmental Law Center (SELC) and Division of Air Quality regarding specifics of EAC strategies. Follow-up meeting between DAQ and SELC set for July 9. In addition, **SELC representatives and Triad EAC have scheduled a September 13 meeting** for in-depth discussion on control measures and implementation..

June 9 - Briefing at Duke Energy Belews Creek Power Plant (Stokes County) on selective catalytic reduction facility and new precipitators which will reduce NO_x by 80% by 2009 (80% between 1996 and 2009), consistent with N.C. Clean Smokestacks Act. Most of the reductions have already occurred. New scrubbers will be installed beginning 2005 with a target operational date of 2008 and will yield a 70% reduction in SO₂.

June 16 - Briefing for elected officials and managers in the Region on Ozone and nonattainment status and PM_{2.5}

Beginning with the August 2 EAC meeting, we will begin a concerted effort of several months, assigning implementation responsibilities for carrying out key strategies and monitoring progress. The August meeting will focus on gaps and overlaps between EAC transportation strategies and the work of the region's four MPOs and PART. Following that, with the help of a transportation subcommittee, we will identify what more can be done to achieve progress in transportation efficiencies and emissions reductions.

2 Progress Toward Adoption and Implementation of Local Measures

To date, the schedule for adoption and implementation of control measures, submitted on March 31 has not changed.

Two new control measures have been added:

- The Winston-Salem City Council in June adopted a fee to be charged for unauthorized burnings.
- 50 electrified parking spaces will be installed at a truck stop along Interstate 85/40 in Mebane (Alamance County EAC member). This is funded by a grant from the National Association of State Energy Offices to the NC departments of Energy and Environment and Natural Resources. These electrified parking spaces give truckers access to heat, air conditioning, internet and telecommunications without idling their diesel engines.

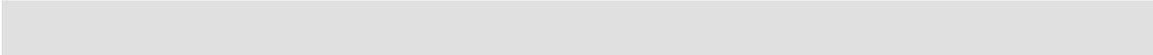
3 Meetings conducted by Stakeholders Since December 31, 2003

The Triad EAC has conducted the following meetings since December 31, 2003:

- February 2, 2004
 - Work on refining strategies -- quantification, combining, etc.
 - Report by DAQ on conversations with Southern Environmental Law Center

 - February 16, 2004
 - Final full EAC meeting on strategies and quantification
 - Quantification presentation by Forsyth County Environmental Affairs Department

 - April 5, 2004
 - Distribution of March 31 Early Action Plan
 - Discussion of next steps
 - Discussion of environmental groups and EACs
 - PM_{2.5} issues in Davidson County and the Triad

 - June 7, 2004
 - Discussion of April 15 nonattainment designations
 - EPA technical comments on Triad EAC March 31 submission
 - EPA administrator's National Press Club speech, April 14, supporting EACs (*see following page*)
 - Status of state modeling and progress on SIP
 - Planning for regional briefing and contracting on Biodiesel
 - Updates on meetings with Southern Environmental Law Center
 - Potential PM_{2.5} designation
- 

Major speeches and testimony delivered by U.S. EPA Administrators 2001 - 2004

Speech Date: 04/14/2004 Delivered at The National Press Club in Washington
Subject: *The Clean Air Rules of 2004: The Next Chapter in America's Commitment to Clean Air*

Excerpt related to EACs:

"Today I will define a new chapter in America's commitment to clean air; it lays out a vision that acknowledges our nation's environmental aspirations and the realities of economic globalism. It is a vision that contemplates new and better approaches in producing one of the most productive periods of air quality improvement in our nation's history. . .

Did non-attainment designation mean that we couldn't grow our economy or build highways? No. Did it mean we had to have a plan and take action to clean our air? Yes.

Today, I have used the phrase "better way." I've spoken of "old thinking" v. "new thinking." An illustration clarifies what I'm talking about.

Some communities recognized early-on that they would not meet our new, more-stringent ozone standards, and began to think creatively about how to clean the air more quickly and avoid designation. Thirty-three metropolitan areas collaborated with the EPA, states and environmental organizations to create an innovative, voluntary agreement called Early Action Compacts.¹³ The Compacts accelerate the planning, implementation and emission reductions before they were required in the Clean Air Act. If all the requirements are met, EPA defers the effective date of the non-attainment designation.

The Early Action Compacts are an example of new thinking. Approximately 10 million people will have cleaner air, faster. It was an effort to avoid some of the frustrating lessons we learned the hard way while implementing earlier standards. For example, we learned that polarizing conflict, endless litigation, and needlessly complex regulations are road blocks to cleaner air.

We learned that using collaborations, incentives and a direct focus on results accelerates our efforts to clean the air, and competitiveness. That's new thinking.

The EPA is optimistic about these Early Action Compacts and we want them to work. The best way to do that is to hold them to a high standard. Nearly all the submissions required significant actions to reduce ozone emissions before the December planning deadline. Regrettably a small number simply haven't demonstrated the necessary progress and they will be designated as non-attainment areas on April 15th.

Will someone object to the existence of Early Action Compacts? Probably. The tension between old thinking and new thinking remains. We will support the agreements because our experience in their development proves once again that we can make more progress, faster if we focus on collaborative, incentive-driven and results-oriented solutions. . . "

Is the Triad heeding call for cleaner air?

Go figure.

Just six weeks ago, the American Lung Association ranked the Triad's air quality among the worst in the nation. Only two weeks earlier, the EPA had warned: If the Triad continues to violate ozone-pollution laws, it will face severe penalties.

Yet, at least so far this summer, the Triad has yet to log a single ozone alert. No "code orange" days, when the air is unsafe for people with certain health problems. No "code red" days, when the air is so bad everybody is put on notice.

Last year, the Triad had only one bad ozone day by now, but in recent years it typically has logged several at this point. Even a code red by mid-June isn't unusual.

One likely factor is humidity. Hot, dry air fuels the ozone level. We've had plenty of heat, but the humidity has been high. We might gripe about sweating buckets on a stroll around the block, but this humidity could be helping the air quality. Of course, weather patterns can change in a minute.

Experts can only speculate as to other reasons for lower ozone levels, but the possibilities are promising. One might involve stricter requirements on automobile and smokestack emissions. In February, Duke Power Co. installed new cleaning equipment in its coal-fired power plant at Belews Creek that should reduce harmful nitrogen oxide emissions substantially. Such emissions contribute to ozone pollution, especially during hot weather.

Another possibility is that residents and businesses are heeding the EPA's call to use less energy. The Piedmont Authority for Regional Transportation reports that calls from commuters interested in its transit service are up considerably, as is ridership. PART officials say calls are up 15 to 20 percent, and they estimate that ridership in May rose about 10 percent from May of last year. The increased demand has led PART to add an extra bus and two new van pools.

At least some of the increase no doubt stems from sky-high gasoline prices. So, the question becomes, with gas prices back on a downward swing in the past few weeks, will commuters who parked their cars to save money turn fickle and revert to their old ways? Let's hope not.

Increasing PART ridership is among the strategies in the Piedmont Triad's plan to reduce pollution to acceptable levels or risk facing penalties such as restrictions on industry and the loss of federal road money. Private carpooling, which companies could help organize and support, is another. The region's governments also have agreed to replace old vehicles with newer, cleaner-burning ones.

The EPA has given the Triad until 2007 to reduce ozone to acceptable levels. Meeting that goal will require all of us to do our share.

Part B

North Carolina Division of Air Quality Status Report

1 Introduction

As a requirement of the Early Action Compacts (EACs), the progress report due June 30, 2004, must include a status report regarding the air quality modeling. This report satisfies this requirement. Discussed in this report is an overview of the changes in the emission inventories and the air quality modeling results.

2 Emissions Inventories

Emissions modeling performed by NCDAQ estimates NO_x and VOC emissions for an average summer day, given specific meteorological and future year conditions and using emission inputs based on emission inventories that include anticipated control measures. The biogenic emissions are kept at the same level as the episodic biogenic emissions since these emissions are based on meteorology. Projections for 2007 take into account all State and Federal control measures expected to operate at that time, including Federal vehicle emissions controls, NO_x SIP Call controls, and North Carolina Clean Smokestacks controls.

The modeling emission inventories changed since the last progress report for both the current year and the 2007 attainment year. These revisions were made to address errors that were found and the use of better available data.

Current Year (2000) Inventory Changes

The changes in the current year point source emission inventories included:

- using actual 2000 emissions data for sources in North Carolina when available,
- corrections to Alabama and Illinois emissions modeling files to remove duplicate sources, and
- inclusion of dropped CEM emissions data.

The current year mobile source emission inventory was changed to correct:

- the vehicle miles traveled data in South Carolina,
- the vehicle age distribution that was used in North Carolina,
- the mobile input files for North Carolina so that the modeled temperatures were used to calculate the emission factors.

The current year nonroad mobile source emission inventory was changed to reflect changes in EPA's NONROAD mobile model. The NONROAD mobile model was re-run for all counties within the 36-km modeling domain. The changes to the inventory were minor, but NCDAQ wanted to use the most recent data available for this modeling

project. There were no changes made to the current year area source or biogenic source emission inventories.

Attainment Year (2007) Inventory Changes

The changes in the 2007 attainment year point source emission inventories included:

- growing the North Carolina 2000 emissions data to 2007,
- correction of stack temperatures in the North Carolina emission files,
- using the latest North Carolina utility emissions according to the Clean Smokestacks Act compliance plan update,
- corrections to Alabama and Illinois emissions modeling files to remove duplicate sources,
- growing the other States non-utility current year emissions to 2007 via EGAS growth factors, and
- using the Clear Skies modeling emission files for the other States utilities.

The 2007 attainment year mobile source emission inventory was changed to correct:

- the vehicle age distribution that was used in North Carolina,
- the mobile input files for North Carolina so that the modeled temperatures were used to calculate the emission factors.

The 2007 attainment year nonroad mobile source emission inventory was changed to reflect changes in EPA's NONROAD mobile model. The NONROAD mobile model was re-run for all counties within the 36-km modeling domain. Again, the changes to the inventory were minor, but NCDAQ wanted to use the most recent data available for this modeling project. Also, the airport projection factors were updated for the three major airports in North Carolina, as well as the airport in Forsyth County. The updated projection information was obtained from the Federal Aviation Administration (FAA).

For area sources the 2007 attainment year inventory was changed to apply North Carolina's open burning rule, and apply federal control strategies expected to be in place by 2007. There were no changes made to the biogenic source emission inventory.

Updated Emission Inventories

The emissions summary for both the 2000 current year and 2007 attainment year for the EAC area is listed in Table 2-1. These emissions represent typical weekday emissions and are reported in tons per day.

Table 2-1: Estimated NOx and VOC emissions

Source	NOx Emissions		VOC Emissions	
	2000	2007	2000	2007
Point	397.44	62.33	60.94	62.97
Area	4.82	5.07	70.82	73.86
Nonroad	39.27	37.32	30.42	25.16
Mobile	147.35	101.97	81.94	62.22
Biogenic	2.20	2.20	446.00	446.00
Total Emissions	591.08	208.89	690.13	670.21

The total predicted NOx emissions for the EAC area decreased by 64% from 591 tons per day (TPD) in 2000 to 209 TPD in 2007. The total predicted VOC emissions for the EAC area decreased by approximately 3%, from 690 TPD in 2000 to 670 TPD in 2007.

There are few VOC control measures expected for area and point sources in the Triad area, so they continue to grow. However, since the Triad area contains the largest power plant in North Carolina, the point source NOx emissions decrease significantly due to the NOx SIP Call rule. Additionally, there are significant decreases in both highway and nonroad mobile source VOC and NOx emissions. Thus the overall region has a decrease in both NOx and VOC emissions.

3 Control Measures

Several control measures already in place or being implemented over the next few years, will reduce point, highway mobile, and nonroad mobile sources emissions. These control measures were modeled for 2007 and are discussed in the Sections below.

3.1 State Control Measures

3.1.1 Clean Air Bill

The 1999 Clean Air Bill expanded the vehicle emissions inspection and maintenance program from 9 counties to 48, phased in between July 1, 2002 through January 1, 2006. Vehicles will be tested using the onboard diagnostic system, an improved method of testing, which will indicate NOx emissions, among other pollutants. The previously used tailpipe test did not measure NOx. The inspection and maintenance program will be phased in from July 1, 2002 through July 1, 2005, in the Triad area. Table 3.1.1-1 lists the phase in dates for the Triad area.

Table 3.1.1-1 Phase-In Dates for the Triad Area

County	Phase-In Date	County	Phase-In Date
Alamance	January 1, 2004	Randolph	January 1, 2004
Davidson	July 1, 2003	Rockingham	July 1, 2004
Forsyth	July 1, 2002	Stokes	July 1, 2005
Guilford	July 1, 2002	Surry	July 1, 2005

3.1.2 NOx SIP Call Rule

North Carolina's NOx SIP Call rule will reduce summertime NOx emissions from power plants and other industries by 68% by 2006. The North Carolina Environmental Management Commission adopted rules requiring the reductions in October 2000.

3.1.3 Clean Smokestacks Act

In June 2002, the N.C. General Assembly enacted the Clean Smokestacks Act, requiring coal-fired power plants to reduce annual NOx emissions by 78% by 2009. These power plants must also reduce annual sulfur dioxide emissions by 49% by 2009 and by 74% in 2013. The Clean Smokestacks Act could potentially reduce NOx emissions beyond the requirements of the NOx SIP Call Rule. One of the first state laws of its kind in the nation, this legislation provides a model for other states in controlling multiple air pollutants from old coal-fired power plants.

3.1.4 [Open Burning Bans](#)

In June 2004, the Environmental Management Commission approved a new rule that would ban open burning during the ozone season on code orange and code red ozone action days for those counties that NCDAQ forecasts ozone.

3.2 Federal Control Measures

3.2.1 Tier 2 Vehicle Standards

Federal Tier 2 vehicle standards will require all passenger vehicles in a manufacturer's fleet, including light-duty trucks and Sports Utility Vehicles (SUVs), to meet an average standard of 0.07 grams of NOx per mile. Implementation will begin in 2004, and most vehicles will be phased in by 2007. Tier 2 standards will also cover passenger vehicles over 8,500 pounds gross vehicle weight rating (the larger pickup trucks and SUVs), which are not covered by current Tier 1 regulations. For these vehicles, the standards will be phased in beginning in 2008, with full compliance in 2009. The new standards require vehicles to be 77% to 95% cleaner than those on the road today. Tier 2 rules will also reduce the sulfur content of gasoline to 30 ppm by 2006. Most gasoline currently sold in North Carolina has a sulfur content of about 300 ppm. Sulfur occurs naturally in gasoline but interferes with the operation of catalytic converters in vehicle engines

resulting in higher NOx emissions. Lower-sulfur gasoline is necessary to achieve Tier 2 vehicle emission standards.

3.2.2 Heavy-Duty Gasoline and Diesel Highway Vehicles Standards

New EPA standards designed to reduce NOx and VOC emissions from heavy-duty gasoline and diesel highway vehicles will begin to take effect in 2004. A second phase of standards and testing procedures, beginning in 2007, will reduce particulate matter from heavy-duty highway engines, and will also reduce highway diesel fuel sulfur content to 15 ppm since the sulfur damages emission control devices. The total program is expected to achieve a 90% reduction in PM emissions and a 95% reduction in NOx emissions for these new engines using low sulfur diesel, compared to existing engines using higher-content sulfur diesel.

3.2.3 Large Nonroad Diesel Engines Proposed Rule

The EPA has proposed new rules for large nonroad diesel engines, such as those used in construction, agricultural, and industrial equipment, to be phased in between 2008 and 2014. The proposed rules would also reduce the allowable sulfur in nonroad diesel fuel by over 99%. Nonroad diesel fuel currently averages about 3,400 ppm sulfur. The proposed rules limit nonroad diesel sulfur content to 500 ppm in 2007 and 15 ppm in 2010. The combined engine and fuel rules would reduce NOx and particulate matter emissions from large nonroad diesel engines by over 90 %, compared to current nonroad engines using higher-content sulfur diesel.

3.2.4 Nonroad Spark-Ignition Engines and Recreational Engines Standard

The new standard, effective in July 2003, will regulate NOx, HC and CO for groups of previously unregulated nonroad engines. The new standard will apply to all new engines sold in the US and imported after these standards begin and large spark-ignition engines (forklifts and airport ground service equipment), recreational vehicles (off-highway motorcycles and all-terrain-vehicles), and recreational marine diesel engines. The regulation varies based upon the type of engine or vehicle.

The large spark-ignition engines contribute to ozone formation and ambient CO and PM levels in urban areas. Tier 1 of this standard is scheduled for implementation in 2004 and Tier 2 is scheduled to start in 2007. Like the large spark-ignition, recreational vehicles contribute to ozone formation and ambient CO and PM levels. They can also be a factor in regional haze and other visibility problems in both state and national parks. For the off-highway motorcycles and all-terrain-vehicles, model year 2006, the new exhaust emissions standard will be phased-in by 50% and for model years 2007 and later a 100%. Recreational marine diesel engines over 37 kW are used in yachts, cruisers, and other types of pleasure craft. Recreational marine engines contribute to ozone formation and PM levels, especially in marinas. Depending on the size of the engine, the standard for will begin phase-in in 2006.

When all of the standards are fully implemented, an overall 72% reduction in HC, 80% reduction in NOx, and 56% reduction in CO emissions are expected by 2020. These controls will help reduce ambient concentrations of ozone, CO, and fine PM.

4 MODELING STATUS

4.1 Status of Current Modeling

Modeling completed to date include: the base case model evaluation/validation runs, the current year modeling runs and the 2007 future year modeling runs. The results of these modeling runs can be viewed at the NCDAQ modeling website:

<http://www.cep.unc.edu/empd/projects2/NCDAQ/PGM/results/>

NCDAQ still needs to complete the 2012 and 2017 future year modeling runs with the updated emission inventories.

4.2 Modeling Results

The base case model runs for all three episodes met the validation criteria set by the EPA. The model evaluation statistics can be viewed at the NCDAQ modeling website cited above.

An example (July 14, 1995) of the 8-hour ozone modeling results for the 2000 current year and 2007 future year are displayed in Figures 4.2-1 and 4.2-2, respectively. One can see a significant decrease in the 8-hour ozone maximums between the current year and the future year. These decrease were the results of the all of the controls listed in Section 3 that are expected to be in place by 2007. The 1996 and 1997 episodes show similar results. Additional modeling results can be viewed on the NCDAQ modeling website cited above.

Figure 4.2-1 2000 current year 8-hour

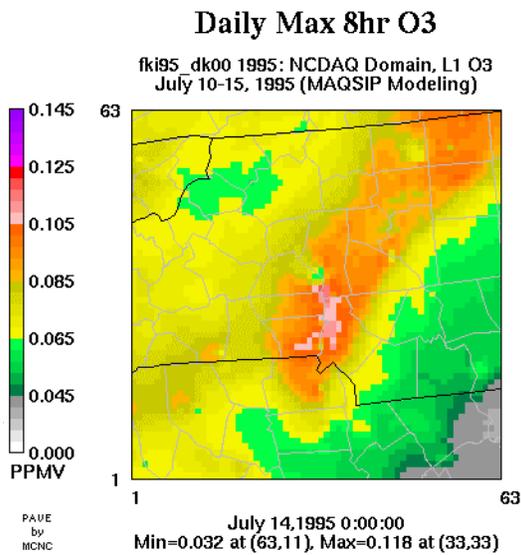
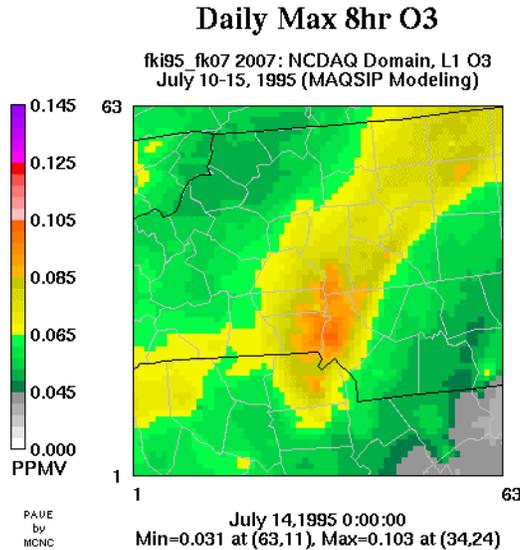


Figure 4.2-2 2007 future year 8-hour
ozone maximum for July 14, 1995.
ozone maximum for July
14, 1995.



4.3 Geographic Area Needing Further Controls

The current draft version of EPA’s attainment test was applied to the modeling results. In very basic and general language the attainment guidance states if the future year design value for a given monitor is below 0.085 parts per million (ppm) then the monitor passes the attainment test. The future year design value of a monitor is calculated by multiplying the current year design value of a monitor by a relative reduction factor (Equation 4.3-1).

$$DVF = DVC \times RRF \quad \text{Equation 4.3-1}$$

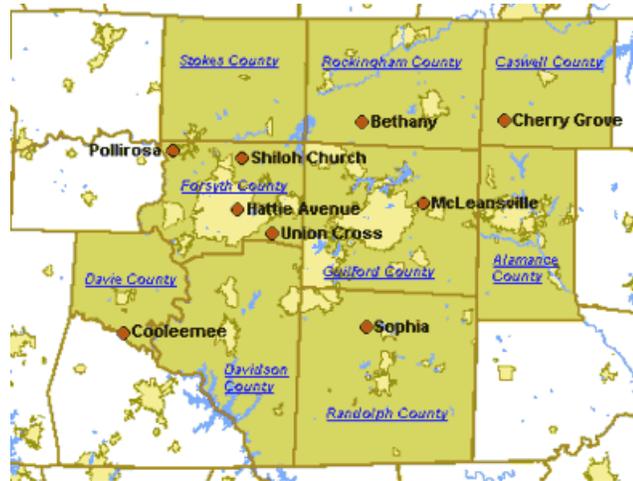
Where DVF is the Future year Design Value,
DVC is the Current year Design Value, and
RRF is the relative reduction factor.

The Current year Design Value (DVC) in the attainment test framework is defined as the higher of: (a) the average 4th highest value for the 3-yr period used to designate an area “nonattainment”, and (b) the average 4th highest value for the 3-yr period straddling the year represented by the most recent available emissions inventory. In this exercise, the DVC used to designate an area nonattainment will be 2001-2003 and the DVC straddling the year represented by the most recent available emissions inventory is 1999-2001. The higher of those two values is shown in Table 4.3-1 as the DVC. The relative reduction factor (RRF) is calculated by taking the ratio of the future year modeling 8-hour ozone daily maximum to the current year modeling 8-hour ozone daily maximum “near” the monitor averaged over all of the episode days (Equations 4.3-2).

$$RRF = \frac{\text{mean future yr. 8-hr daily max “near” monitor “x”}}{\text{mean current yr. 8-hr daily max “near” monitor “x”}} \quad \text{Equation 4.3-2}$$

There are nine ozone monitors in Triad EAC area. These monitors are: Bethany, located in Rockingham County; Cherry Grove, located in Caswell County; McLeansville, located in Guilford County; Sophia, located in Randolph County; Cooleemee, located in Davie County; and Hattie Ave, Pollirosa, Shiloh Church and Union Cross, all located in Forsyth County. The location of these monitors are shown in Figure 4.3-1.

Figure 4.3-1: Triad Area's Ozone Monitor



The results of applying the attainment test showed all monitors in the EAC area in attainment of the 8-hour ozone NAAQS in 2007. These results are displayed in Table 4.3-1 below.

Table 4.3-1 Attainment Test Results for the EAC Area

Monitor Name	DVC (ppm)	RRF	DVF (ppm)
Bethany	0.091	0.84	0.076
Cherry Grove	0.090	0.85	0.076
Cooleemee	0.096	0.88	0.084
Hattie Avenue	0.094	0.86	0.080
McLeansville	0.090	0.85	0.076
Pollirosa	0.082	0.85	0.069
Shiloh Church	0.089	0.86	0.076
Sophia	0.085	0.85	0.072
Union Cross	0.093	0.85	0.079

It appears from these results that the expected controls already in place will result in attainment of the 8-hour ozone NAAQS.

4.4 Remaining EAC Schedule

Emissions Modeling Schedule	
7/9/2004	Submit 2012 future maintenance emissions
7/16/2004	Submit 2017 future maintenance emissions

AQ Modeling Schedule	
7/23/2004	2012 future maintenance AQ runs done
8/2/2004	2017 future maintenance AQ runs done

General Schedule	
7/7/2004	Preliminary "concept" presented to AQC
7/9/2004	Share MOBILE inputs w/ DOT and MPOs (95,96,97,00,07,12,17)
7/30/2004	Draft MOBILE documentation to DOT and MPOs
8/6/2004	EAC modeling complete
8/20/2004	Comments from DOT/MPOs due
9/1/2004	Final documentation complete
9/9/2004	AQC meeting
10/19-22/2004	Public Hearings
10/29/2004	Public comment period ends
12/3/2004	Submit EAC SIPs

4.5 Anticipated Resource Constraints

The resource constraint of most concern is the funding needed to implement some of the local control measures. NCDAQ and the local EAC areas are both looking for grant opportunities to help fund EAC initiatives.