

USEPA UPDATE CAA ISSUES

Agricultural Air Quality Task Force

San Diego, CA

May 8-10, 2007

OZONE NAAQS REVIEW

- **Proposal by June 20, 2007**
- **Public comment period of 90 days**
- **Public Hearing – Late August or early September**
- **Final Rule by March 12, 2008**

OZONE NAAQS REVIEW

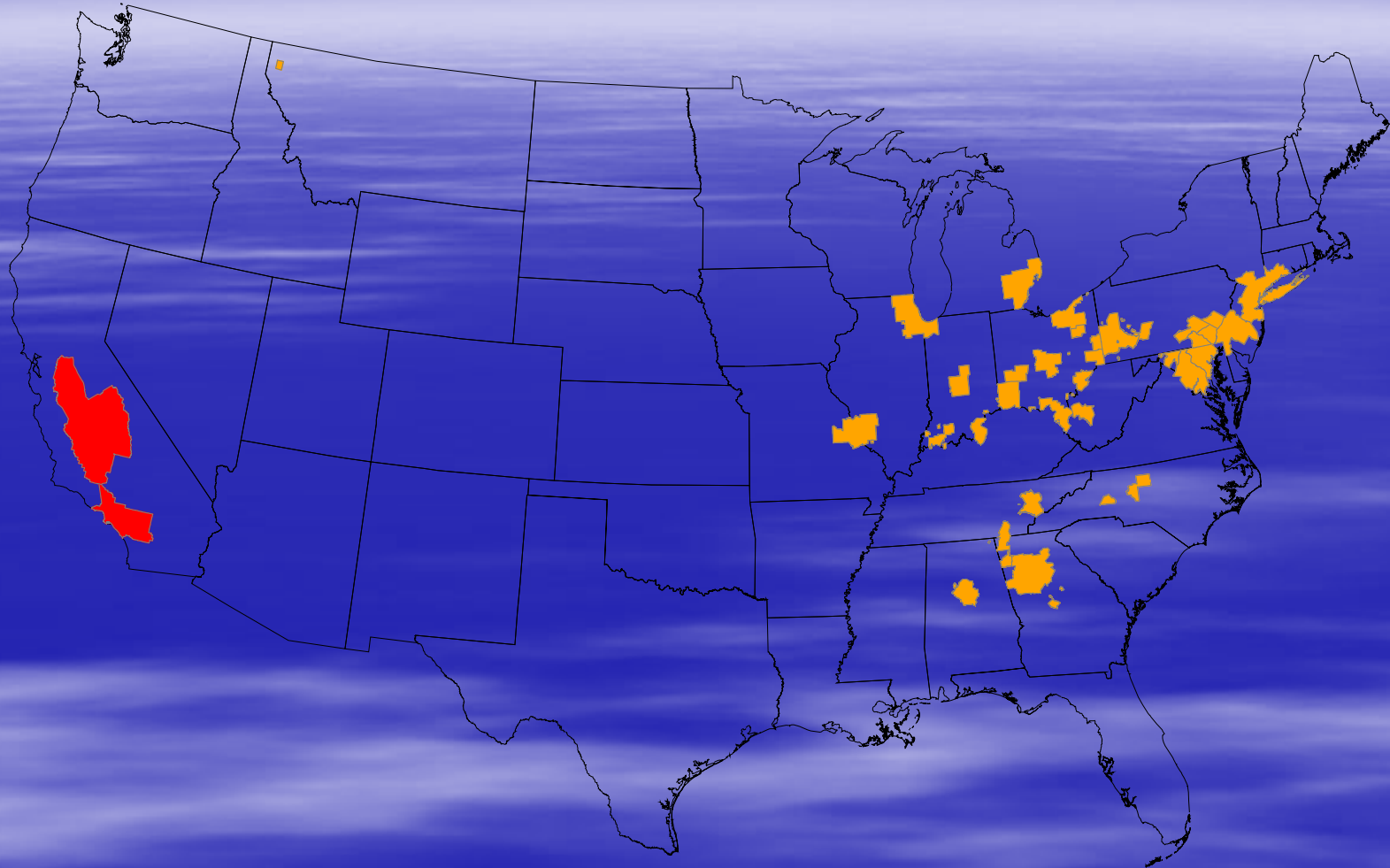
- **Body of evidence on ozone health effects calls into question the adequacy of the current standard**
- **Assessment of environmental effects suggests that with attainment of current primary standard, significant environmental effects continue to occur**
 - **W126, a cumulative weighted total of 12-hour exposures over a 3 month period recommended**

Timeline for PM2.5 NAAQS Implementation

April 2005	39 areas designated for 1997 standards
Dec. 2006	2006 revised PM NAAQS
Dec. 2007	States recommend designations for 2006 revised PM2.5 standards
April 2008	PM2.5 State plans due for 1997 standards
2008-9	Final designations for 2006 PM2.5 standards (effective date 60-90 days later; 2009-10)
Apr 2010-15	Attainment date for areas designated in 2005 for 1997 standards
April 2012-13	PM2.5 State plans due for 2006 standards
April 2014-20	Attainment date for areas designated in 2009-10

Currently Designated PM_{2.5} Nonattainment Areas - 1997 Standards

Violated annual and/or 24-hour PM_{2.5} standards with designated data (2001-2003*)



Legend

Nonattainment areas violating:

- both annual (15 µg/m³) and 24-hour (65 µg/m³) standards
- ONLY the 24-hour standard (65 µg/m³)
- ONLY the annual standard (15 µg/m³)

Number of Areas

2

0

37

Total PM_{2.5} Nonattainment Areas

39

* 2002-2004 data were considered in the designation process but all nonattainment designations were based on 2001-2003 data

Pollutants to Address in Attainment Plans

- Direct PM_{2.5} and SO₂: must be evaluated for control measures in each area
- NO_x: Sources must be evaluated for control measures in each area, unless the State and EPA provides a technical demonstration showing that emissions from sources in the State do not significantly contribute to PM_{2.5} concentrations in a specific area
- VOC and Ammonia: Sources are not required to be evaluated for control measures in each area, unless the State or EPA provides a technical demonstration showing that emissions from sources in the State significantly contribute to PM_{2.5} concentrations in a specific area
- Rule provides basic guidance on potential analyses for technical demonstration; weight of evidence approach.

Reasonably Available Control Technology (RACT) / Reasonably Available Control Measures (RACM)

- **For nonattainment areas, States need to adopt all reasonably available control measures (including RACT) needed to attain the standards as expeditiously as practicable and meet Rate of Further Progress requirements**
 - **Collective analysis; demonstrate that no reasonably available additional measures would advance the attainment date by at least 1 year**
- **Area-specific flexibility**
 - **No tonnage threshold; evaluate smaller sources for areas with more severe problem**
- **Preamble includes list of specific measures that States should consider**

Condensable Particulate Matter

- Emission inventories have been required to include condensable PM for a number of years
- Test methods for condensable PM are available but concerns remain about data uncertainties and ability to develop enforceable emission limits for many sources in a short period of time.
- For sources included in PM_{2.5} attainment plans, emissions limits including condensable PM are required after January 2011.
- Transition period activities include updating and testing methods

EXCEPTIONAL EVENTS RULE

- Final Rule on March 22, 2007
- Wildfires or “wildland fire use” fires are natural events
- Prescribed fires managed for resources management benefits may qualify for exceptional events if:
 - “unlikely to recur” and “not reasonably preventable”
 - State certifies SMP or basic smoke management practices in place

EXCEPTIONAL EVENTS RULE

- All other fires to be addressed under the Interim Air Quality Policy on Wildland and Prescribed Fires
- Policy to be updated by July 2008
- Policy will be revised to include
 - Regional Haze impacts
 - Agricultural burning
- Rule also addresses high wind events

Other Issues

- **Ozone 8-hour implementation**
- **TSP as a regulated pollutant**
- **Listing diesel PM as a HAP**
- **Regional Haze Rule implementation**
 - **First SIPs due December 17, 2007**
 - **Update every 10 years**
 - **Requires reasonable progress toward goal**
 - **Establish natural and baseline conditions**