



Lessons Learned: 1997 Ozone Standard

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Overview

- Regional Lessons Learned:

- ❖ Redesignations
- ❖ Early Actions
- ❖ Reclassifications
- ❖ Attainment SIPs

- National Lessons Learned:

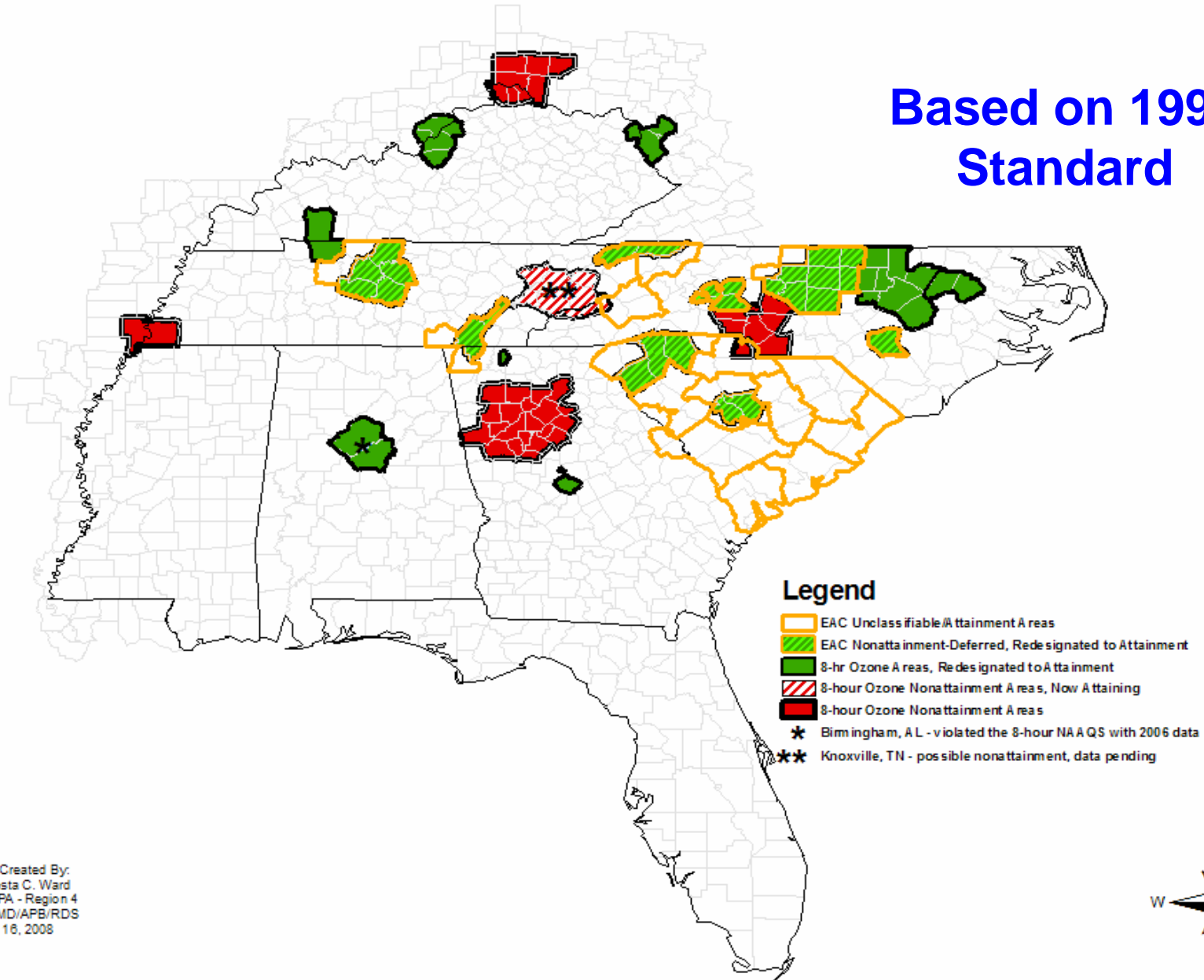
- ❖ Phase 1 Implementation Rule
 - ❖ Subpart 1 vs. Subpart 2
 - ❖ Antibacksliding

- Emerging issues



8-hour Ozone Designations and Early Action Compact Areas

Based on 1997 Standard



Map Created By:
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USEPA - Region 4
APTMD/APB/RDS
June 18, 2008



Regional Lessons Learned



Redesignations

- **Attain NAAQS**
- **Complete SIP**
- **Air Quality improvement due to permanent & enforceable reductions in emissions resulting from permanent & enforceable reductions**
 - **Baseline**
 - **Projection inventory out 10 years with 3 yr interval**
 - **Clearly documented – real reductions not favorable meteorology**
- **175A Maintenance Plan**
 - **Contingency Plan**
 - **Schedule**
 - **List of controls**
 - **Triggers**
- **States must meet all of Section 110 and Part D**





Regional Lessons Learned

Redesignations cont.

- ***Air Quality improvement due to permanent & enforceable reductions in emissions resulting from permanent & enforceable reductions***
 - ***Baseline***
 - ***Projection inventory out 10 years with 3 yr interval***
 - ***Clearly documented – real reductions not favorable meteorology***



Regional Lessons Learned

Redesignations cont.

- **175A Maintenance Plan**

- **Contingency Plan**

- Schedule for Adoption and Implementation – should be as expeditious as practicable, but no longer than 24 months
- List of controls – clearly identify the measures to be adopted
- Triggers
 - Where maint demonstration based on inventory State may identify action level or emissions
 - Use monitored or modeled violations of the NAAQS



Regional Lessons Learned

Redesignations cont.

- NO_x SIP Call – large impact on improving air quality
- Early Action/Local/Voluntary measures important



Regional Lessons Learned

Early Actions

- Proactive measures beneficial
- Local/Voluntary measures important

Benefits:

- Cleaner Air Sooner
- Local/Voluntary efforts established effective communication systems between stakeholders
- Possible Attainment vs. nonattainment
- Ozone – possible lower classification



Regional Lessons Learned

Reclassifications

- Schedule Questions
 - CAA – EPA acts 6 months from failure to attain
 - Attainment SIPs due 12 to 18 months from that date
- Shorter timeframe for States to address a more stringent classification – modeling, RACT, RFP, I&M...
- RFP questions – when controls implemented in order to take credit?





Regional Lessons Learned

Reclassifications continued –RFP questions

- Baseline year important
- Reductions beyond NAA boundaries

Example:

- Area bumped up to moderate March 2008
- Base year was 2002
- Section 182(b)(1) & CFR 51.910 – 15% VOC reduction by Dec 31, 2008 (6 yrs from baseline)





Regional Lessons Learned

**Reclassifications continued –
RFP questions**



Guidance memorandums:

August 15, 2006 – 8-hr O₃ NAAQS Implementation - RFP

May 30, 2007 – Emission Reduction Credit for 3 Fed Rules for
Categories of Consumer and Commercial Products under 183(e)

October 11, 2007 – Partial Voluntary Remand Sought in the O₃
Phase 2 Rule Concerning ROP Reductions Obtained from Outside a
NA Area



Regional Lessons Learned



Attainment SIPs

- Required elements – changes based on what part of the CAA you're under – may not even need to send SIP
- What will get you into attainment?
- What emission reductions are coming on line?
- Show us reductions, WE NEED TO SEE REDUCTIONS
- Need strong WOE



Regional Lessons Learned

Attainment SIPs

- RACT and RACM
 - Include RACT analysis in addition to regulations
 - More explanation of control measures
 - Estimation of potential emission reductions
 - Evaluation of time needed to implement these measures
 - Any possible control measures besides NOx SIP Call and RACT





Regional Lessons Learned

Attainment SIPs

- Contingency measures
 - List of measures
 - Schedule





Regional Lessons Learned

Multi-State SIPs

- Communication –
 - States should consult early and often and work together
 - Show attainment in entire NAA

National Lessons Learned



Subpart 1 vs. Subpart 2 Classification

- DC Circuit court vacated subpart 1 classification methodology
- EPA is developing an approach to respond to the court that will be proposed in the FR in the coming months
- Future 2008 Ozone Standard Implementation Rule



National Lessons Learned



Anti-backsliding

- DC Circuit Court concluded EPA improperly determined that 4 requirements would no longer apply once 1-hr standard revoked
 - 1-hr NSR
 - 185 fees imposed for failure to attain 1-hr
 - Contingency measure for the 1-hr and
 - 1-hr conformity (just RE: use of 1-hr budgets until 8-hr budgets established)
- Future proposed rule to address these issues
- Future 2008 Ozone Standard Implementation Rule



Emerging Issues



- **CAIR Vacature Implications on R4 Ozone:**

- ⇒ CAIR = RACT
- ⇒ CAIR – reliance for *local and interstate regional* reductions
- ⇒ Agency currently evaluating impacts, next steps
 - Effect on R4 Ozone SIPs?

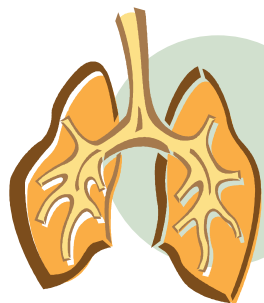
- **Early Action Compact Evaluation Report:**

- ⇒ Qualitative and Quantitative look at effectiveness of EACs
- ⇒ Uncertainty about future EACs

Recent Changes to Standards

- U.S. EPA recently revised NAAQS standards
 - Including “primary” standards – designed to protect human health
 - O₃ standard:
 - Revised March 12, 2008
 - 0.08 ppm 8-hour standard lowered to 0.075 ppm
- http://www.epa.gov/groundlevelozone/pdfs/2008_03_factsheet.pdf
- Should protect against acute O₃- and PM_{2.5}-related health effects





Health Benefits of Reduced Standards*



| Reduced cases of... | O ₃ [^] | PM _{2.5} |
|---|-----------------------------|--|
| Premature death | ~260 to 2,300 | 1,200 to 13,000 in people with heart or lung disease |
| Chronic bronchitis | 380 | 2,600 |
| Nonfatal heart attacks | 890 | 5,000 |
| Hospital admissions & emergency department visits | 1,900 | 1,630 CV and resp HAs |
| | | 1,200 asthma ED visits |
| Acute bronchitis | 1,000 | 7,300 |
| Upper and lower respiratory symptoms | 11,600 | 97,000 |
| Aggravated asthma | 6,100 | 51,000 |
| Missed work or school days | 243,000 | 350,000 |
| Restricted activity days | 750,000 | 2 million |

*By year 2020, according to EPA Regulatory Impact Analyses; summaries found at

- http://www.epa.gov/groundlevelozone/pdfs/2008_03_factsheet.pdf
- <http://www.epa.gov/particles/fs20061006.html>

[^]Reflect both O₃ and PM pollution reductions resulting from revised O₃ standard

Conclusions



- Thank you to the states for draft documents and open lines of communication!
- Redesignation process went smoothly and states made effort to address our concerns
- Reclassification process went smoothly and faster than prior reclassifications.
- Suggestions for improvement in coordination for future plans?
- Feedback is welcome! *(Can also phone/e-mail your State Contact and spann.jane@epa.gov.)*

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Questions???

