

10/27/1978

VOC451027781

**Category:** 45 – Criteria for Plan Revisions for Nonattainment Areas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

DATE: OCT 27 1978

SUBJECT: Oxidant Standard Work Group Meeting on 10/19/78

FROM: Howard R. Heim, Jr.  
Lead Region Representative, Region III (3AH13)

TO: Air Branch Chiefs  
Regions I to X

The Oxidant Standard Work Group met on Thursday, October 19 to discuss the comments received as a result of the proposed oxidant standard revision. Other discussion items included the level of the secondary standard, the schedule for final promulgation, and the submission of the 1979 SIP revisions. This latter topic is quite important from a Regional standpoint, since it will directly impact the Regional workload during the review period. This was the last meeting prior to promulgation, so the possible final standard level was also discussed. A summary of the meeting discussion follows:

- Promulgation is now scheduled for December 22, and every effort will be made to promulgate prior to December 31, so the new standard should be available before the due date for the 1979 SIP's.
- Comments were about evenly divided over the .1 proposal. A relatively small portion endorsed the .1 proposal with about equal portions advocating levels above and below .1. This is, of course, by a simple count of the comments received. In general, most proposals for a standard more stringent than .1 came from individuals, while comments for a more lenient standard came from groups. State and local agencies generally endorsed a .12 ozone standard. Two significant comments were discussed in detail.
- Comments by the Texas Air Board suggested that all laboratory ozone studies were seriously flawed due to the presence of singlet oxygen which would not be expected in ambient ozone. This contention does not seem supportable based on available theory and some modest laboratory studies done for this purpose. Paul Altschuller will prepare a detailed response to this comment.

- One other comment rated special attention, mainly because of the high position of the commenters. The President's Council of Economic Advisors, Regulatory Analysis Review Group submitted comments to the effect that EPA's decision method was inadequate. Instead, the group urged that a marginal cost method be used to set the primary standard, and that their analysis suggested a level of .15 to .16 ppm. This would seem to conflict with the requirements of the Clean Air Act and a careful response will be prepared.
- The secondary standard was also discussed. At the last committee meeting, it was suggested that a cost-benefit method would be appropriate for setting the secondary standard. Damages due to ozone were estimated, and maximum figures in the range of \$250 - 500 million for a .1 standard and \$300 - 600 million for a .12 standard were mentioned. The feeling expressed in the meeting was that these damage figures do not support a secondary standard more restrictive than the primary.
- Finally, the probable standard was discussed. It appears that, in addition to .08 and .1, .12 is a possible final standard, both primary and secondary. The final decision will undoubtedly be made by Mr. Costle. A straw poll of the EPA offices present indicated a preference for .12. In addition, the form of the standard might go to a daily max rather than an hourly form. This is not expected to make much difference in required controls. The statistical form and the change to an ozone standard seem firm.
- The impact of these possibilities on the ozone SIP submissions was discussed in some detail. Jeff Cerar, the OGC representative, stated that in legal terms a .08 SIP plan would be satisfactory for 1979 since a more stringent SIP is permitted by the Clean Air Act. States could then relax their SIP's at their leisure. The Region III representative, Bill Belanger, pointed out that with all of the other SIP matters coming out at this time, a double review of the ozone SIP's would be quite taxing on limited regional resources. It would be far more desirable to approve SIP's at the final control level so the paperwork need only be done once. After some discussion, it was decided that if states choose to devise alternate SIP's (sometimes called modular), and to hold appropriate public hearings, that they should be encouraged to evaluate the .08, .1 and .12 levels as possible standards. No conclusions should be drawn on the final standard level which will be set by the Administrator. In the interim, the official NAAQS for oxidants remains at 0.08 ppm, for SIP planning purposes.