



**Air & Waste Management
Association
Regulatory Conference
Future NAAQS Issues**

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Anticipated NAAQS Implementation Milestones

Pollutant	NAAQS Prom. Date	Governor's Rec. Due to EPA	Designations Effective (approximate date)	110(a) SIPs Due (3 yrs after NAAQS promulgation)	Attainment Dem. Due	Attainment Date	Notes & Impacts to GA
Pb	Oct 2008	Oct 2009	Nov 2010/2011 (extra time for new monitors)	Oct 2011	N/A	N/A	<ol style="list-style-type: none"> 1. Required to Add 1 monitor at Cartersville Steel Mill. 2. All areas in GA meeting this standard.
NO ₂ (primary)	Jan 2010	Jan 2011	Feb 2012	Jan 2013	N/A	N/A	<ol style="list-style-type: none"> 1. Required to add 3 roadside NO₂ monitors (2 in Atlanta and 1 in Augusta) by Jan. 2013 2. All areas in GA meeting this standard 3. Permitting new NO₂ (combustion sources) more difficult. 4. Roadside monitors could show nonattainment
SO ₂ (primary)	June 2010	June 2011	July 2012	June 2013	Jan 2014	July 2017	<ol style="list-style-type: none"> 1. All areas in GA meeting this standard 2. 110(a) SIP expected to require us to model all large SO₂ sources. Could result in industry/utility SO₂ reductions and a lot of permitting. 3. Permitting new SO₂ sources more difficult.
Ozone	July 2011?	2012?	2013? (based on 2010-12 data)?	July 2014?	2016?? (to be proposed)	2019?? (Moderate)	<ol style="list-style-type: none"> 1. Standard Proposed 60-70 ppb 2. More nonattainment areas possible: Macon, Athens, Augusta, Columbus, North GA all potentially affected. 3. Areas classified as "moderate" or above by EPA required to implement I/M programs. 4. Proposed rule may require more 8 more monitors (Whitfield, Floyd, Hall, Houston, Dougherty, Liberty, Lowndes, Coffee)
CO	May 2011	May 2012	June 2013	May 2014	N/A	N/A	<ol style="list-style-type: none"> 1. Standard proposed to stay same 2. Two roadside monitors proposed in Atlanta 3. All areas in GA meeting this standard
PM _{2.5} (2012)	2012?	2013?	2014?	2015?	2017?	2019?	Preliminary indications from EPA are that standard will become more stringent again.
NO ₂ /SO ₂ Secondary	March 2012	March 2013	April 2014	March 2015	Oct 2015	N/A	Impacts are unknown at this time



OZONE NAAQS



Ozone NAAQS

- **Promulgation Date - July 2011?**
- **Governor's Rec. Due to EPA - 2012?**
- **Designations Effective (approximate date) - 2013?**
 - (based on 2010-12 data)?
- **110(a) SIPs Due - July 2014? (3 yrs after NAAQS promulgation)**
- **Attainment Demonstration Due - 2016??**
 - Not Required for Marginal Areas
- **Attainment Date –**
 - 2016?? (Marginal)
 - 2019?? (Moderate)
 - 2022?? (Serious)



Notes & Impacts to GA

- Standard Proposed to be in range 60ppb to 70ppb
- More nonattainment areas possible: Macon, Athens, Augusta, Columbus, North GA all potentially affected.
- Areas classified as “moderate” or above by EPA required to implement I/M programs.



Ozone Ambient Monitoring Data

					'11 critical 60	'11 critical 65	'11 critical 70	'11 critical 75
Monitor	2008	2009	2010*	'08-'10 DV				
Augusta	0.077	0.065	0.072	0.071	0.044	0.059	0.074	0.089
Evans	0.075	0.064	0.068	0.069	0.049	0.064	0.079	0.094
Columbus Airport	0.073	0.065	0.067	0.068	0.049	0.064	0.079	0.094
Macon SE	0.080	0.070	0.071	0.074	0.040	0.055	0.070	0.085
Fort Mountain	0.077	0.069	0.074	0.073	0.038	0.053	0.068	0.083
Dawsonville	0.075	0.067	0.073	0.072	0.041	0.056	0.071	0.086
Summerville	0.068	0.065	0.067	0.067	0.049	0.064	0.079	0.094
Leslie	0.068	0.060	0.069	0.066	0.052	0.067	0.082	0.097
Brunswick	0.067	0.059	0.066	0.064	0.056	0.071	0.086	0.101
Savannah	0.067	0.062	0.065	0.065	0.054	0.069	0.084	0.099
Athens	0.077	0.067	0.072	0.072	0.042	0.057	0.072	0.087
Confederate Ave.	0.086	0.077	0.080	0.081	0.024	0.039	0.054	0.069
Gwinnett	0.081	0.073	0.071	0.075	0.037	0.052	0.067	0.082
Conyers	0.090	0.070	0.078	0.079	0.033	0.048	0.063	0.078
McDonough	0.086	0.074	0.078	0.079	0.029	0.044	0.059	0.074
Douglasville	0.080	0.072	0.074	0.075	0.035	0.050	0.065	0.080
South DeKalb	0.087	0.077	0.074	0.079	0.030	0.045	0.060	0.075
Newnan	0.075	0.065	0.065	0.068	0.051	0.066	0.081	0.096
Kennesaw	0.079	0.076	0.079	0.078	0.026	0.041	0.056	0.071
Dallas / Yorkville	0.073	0.067	0.071	0.070	0.043	0.058	0.073	0.088
Average	0.077	0.068	0.072					



PM2.5 NAAQS



PM_{2.5} (2012)

- **Promulgation Date - 2012?**
- **Governor's Rec. Due to EPA - 2013?**
- **Designations Effective (approximate date) - 2014?**
- **110(a) SIPs Due - 2015?**
- **Attainment Demonstration Due - 2017??**
- **Attainment Date - 2019??**

- Preliminary indications from EPA are that standard will become more stringent again.



SO₂ NAAQS



SO₂ NAAQS

- **Final SO₂ NAAQS in FR (75 FR 35520) on June 22, 2010 (signed June 2, 2010)**
- **Governor's Rec. Due to EPA – June 2011**
 - Based on all monitors showing compliance with the standard, expect to recommend all areas be designated attainment or unclassifiable
- **Designations Effective – July 2012**
- **110(a) “Infrastructure” SIPs Due – June 2013**



SO₂ NAAQS – Section 110(a)(1) “Infrastructure SIP”

- In final rule preamble, EPA says:
- Traditionally, for areas that were designated “attainment” or “unclassifiable”, we accepted State submissions of prevention of significant deterioration (PSD) permitting programs and other “infrastructure” SIP elements contained in CAA section 110(a)(2) as being sufficient to satisfy the section 110(a)(1) SIP submission requirement. (75 FR 35552)



SO₂ NAAQS – Section 110(a)(1) “Infrastructure SIP”

- We currently anticipate that our projected post-designation implementation approach would look to robust CAA section 110(a)(1) SIPs,for the new SO₂ NAAQS would serve as substantive “attainment” SIPs. (75 FR 35553)
- ...states must use “refined air quality modeling” on “any individual sources with the potential to emit 100 or more tons per year of SO₂, and other sources that may also cause or contribute to violations of the new SO₂ NAAQS.” – (75 FR 35553)



SO₂ NAAQS – Section 110(a)(1) “Infrastructure SIP”

- Section 110(a)(1) Infrastructure SIP due three years after NAAQS is final (June 2013)
- Expect EPA to release detailed guidance for public comment next month