

2014 EPA/State/Local Modelers Conference

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Overview

- **PM_{2.5} Policy updates**
 - PM_{2.5} NAAQS Implementation Rule
 - PM_{2.5} Significant Impact Levels (SILs) Rule
 - Significant Monitoring Concentration (SMC) Rule
- **Additional NSR Rules & Guidance updates**
 - Final 2008 Ozone Implementation Rule
 - Final Tribal Minor NSR Rule Amendments
 - PSD Permit Extension Guidance
 - Interim PM_{2.5} Condensibles Guidance
 - 1-hr NO₂/SO₂ NAAQS implementation
- **Future actions under consideration**
 - 2015 Ozone NAAQS Review
 - Ambient Air and PSD offsets



Additional NSR Rules and Guidance Updates



2008 Ozone NAAQS Implementation Rule

- Revised primary 8-hr Ozone standard in 2008 (75 ppb)
- EPA designations for the 2008 Ozone NAAQS effective on July 20, 2012
 - Litigation on certain final area designations
 - Petition seeking re-designation to nonattainment of areas initially designated as attainment
- 2008 Ozone NAAQS SIP Requirements Rule
 - Proposed May 29, 2013 (78 FR 34178)
 - Anticipate final rule in Fall 2014
 - Attainment plans and demonstrations due July 2015 (Moderate) or July 2016 (Serious and above)



2015 Ozone NAAQS Implementation Rule

- Received court ruling on April 29, 2014
 - Propose December 1, 2014, Final October 1, 2015
- Planning underway to coordinate implementation activities and to ensure early involvement:
 - FACA formed in 1995 to address Ozone, PM and RH implementation for the 1997 standard/rules
 - Listening sessions held with NACAA & selected state group reps and others in 2010 and again in 2011-2012



NO₂/SO₂ NAAQS Implementation Issues

- Both NAAQS involve stringency that challenges the PSD process:
 - Low SILs claimed to be of little value for streamlining purposes
 - “Worst case” nature of modeling demonstrations slows or stops permitting
 - Annual/24-hour NAAQS to be revoked but:
 - **CAA mandates Annual/24-hour SO₂ increment assessment**
- EPA guidance has addressed some of the issues
 - June 2010 and Mar 2011 1-hr NO₂ PSD Guidance
 - Aug 2010 1-hr SO₂ PSD NAAQS Guidance
- SO₂ SIP Modeling Guidance – AQPD reviewing the suggested 1-hr emission rate calculation for SIP modeling to determine adequacy for PSD
 - Up to 30-day rolling average for compliance test
 - Conferring with ROs, OGC and some states for path forward
 - Likely case-by-case approach for PSD permitting



NO₂/SO₂ NAAQS Implementation Issues (Con't)

Recent PSD Modeling Guidance:

- Applicability of Appendix W Modeling Guidance for the 1-hour NO₂ National Ambient Air Quality Standard, June 28, 2010
 - http://www.epa.gov/ttn/scram/ClarificationMemo_AppendixW_Hourly-NO2-NAAQS_FINAL_06-28-2010.pdf
- Applicability of Appendix W Modeling Guidance for the 1-hour SO₂ National Ambient Air Quality Standard, August 23, 2010
 - http://www.epa.gov/ttn/scram/ClarificationMemo_AppendixW_Hourly-SO2-NAAQS_FINAL_08-23-2010.pdf
- Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO₂ National Ambient Air Quality Standard, March 1, 2011
 - http://www.epa.gov/ttn/scram/Additional_Clarifications_AppendixW_Hourly-NO2-NAAQS_FINAL_03-01-2011.pdf



Final Tribal Minor NSR Rule Amendments

- Final Amendments, signed on May 9, 2014, addressed six exemption categories and clarified construction related terms
 - **Exemption categories included:**
 - Certain emergency generators,
 - Internal combustion engines with a horsepower rating below 50,
 - Certain small furnaces or boilers used for space heating,
 - Single family residences and residential buildings with four or fewer dwelling units
 - Air conditioning units not associated with industrial processes
 - Cooking of food other than wholesale businesses that both cook and sell cooked food
 - **Clarified construction related terms:**
 - Beginning and commencing construction



PSD Permit Extension Guidance

- Purpose: clarify adequate justification for permit extension
 - EPA issued national guidance on January 31, 2014
 - Generally should be available for an additional 18-month period following the initial timeframe
 - Shorter or longer time periods may be granted depending on justification provided
 - Public notice/comment not necessary for simply extending deadline if:
 - Substantive permit conditions do not change



Condensable PM Interim Guidance

- For using Method 202 in measuring CPM for both PSD and nonattainment NSR
- Responds to potential positive bias concerns due to test blank contamination (solvents, etc.)
 - CPM over-estimation can affect source applicability determinations, air quality analyses, emissions offset calculation and source compliance activities
- Guidance will provide alternative “blank correction” procedures until EPA issues a best practices document for Method 202 and revises Method 202 as necessary
- Guidance memo was issued on April 8, 2014



Future actions under consideration



Preliminary 2015 Ozone NAAQS Review Conclusions

- **Primary Standard (75 ppb)**
 - Exposure/risk evidence suggest public health protection not adequate
 - Appropriate to consider revising standard to provide greater public health protection
 - Range of levels from 70 ppb to 60 ppb, in conjunction with the current indicator (O_3), averaging time (8-hour), and form (3 year average of 4th highest daily maximum)
- **Secondary Standard (75 ppb)**
 - Exposure/risk information suggest public welfare protection not adequate
 - Appropriate to consider revising standard to provide greater public welfare protection
 - focusing on a W126-based cumulative seasonal metric and a range of levels from somewhat above 15 ppm-hrs down to 7 ppm-hrs (3 year average)



Ambient Air & PSD Offsets

- Ambient Air
 - Several discussions with OGC on Ambient Air definition
 - EPA will continue to review and make recommendations
- PSD Offsets
 - Currently PSD offsetting is a “modeling” exercise
 - Problematic with new lower standards
 - Reviewing other options to include nonattainment ‘style’ offsetting in certain cases
- No schedule set for either action