

**NACAA Conference Call on
EPA's Proposed Ozone NAAQS**

**Monday, January 12, 2015
3:00 – 4:00 PM EASTERN TIME
Call-in number: (866) 365-4406
Access code: 2682624#**

Discussion Topics

EPA proposed revised National Ambient Air Quality Standards (NAAQS) for ozone on December 17, 2014 (79 *Federal Register* 75234, www.gpo.gov/fdsys/pkg/FR-2014-12-17/pdf/2014-28674.pdf). The agency will hold three public hearings on the proposal: January 29, 2015 in Arlington, TX; January 29, 2015 in Washington, DC; and February 2, 2015 in Sacramento, CA. The deadline for submitting written comments is March 17, 2015. EPA is under court order to promulgate a final decision on revising the ozone NAAQS by October 1, 2015.

The purpose of this NACAA conference call is to discuss comments to be presented in NACAA's testimony on key aspects the proposed NAAQS and related issues.

- I. Primary Ozone NAAQS
 - a. Consistent with its statutory responsibility to set primary NAAQS to protect public health with an adequate margin of safety, including the health of at-risk groups, as well as its conclusion that the current primary ozone standard is not requisite to do so, EPA proposes to revise the primary ozone NAAQS of 0.075 parts per million (ppm), set in 2008, to a level within the range of 0.065 to 0.070 ppm.
 - b. EPA also proposes to retain the indicator (ozone), averaging time (8 hours) and form (annual fourth-highest daily maximum, averaged over three years) of the existing primary ozone NAAQS.
 - c. "Recognizing that the CASAC [Clean Air Scientific Advisory Committee] recommended a range of levels from 0.060 ppm to 0.070 ppm, and that levels as low as 0.060 ppm could potentially be supported," EPA is soliciting comments on alternative standard levels below 0.065 ppm, and as low as 0.060 ppm.
 - d. EPA is also taking comment on the option of retaining the current primary ozone standard of 0.075 ppm without revision.

- II. Secondary Ozone NAAQS
 - a. EPA proposes to revise the current secondary ozone NAAQS of 0.075 ppm "to provide increased protection against vegetation-related effects on public welfare."
 - b. EPA proposes to conclude that the following would provide the requisite protection against known or anticipated adverse effects on the public welfare: Air quality in terms of a three-year average seasonal W126 index value, based on the three-consecutive-month period within the ozone season with the

- maximum index value, with daily exposures cumulated for the 12-hour period from 8:00 AM to 8:00 PM, within the range from 13 ppm-hrs to 17 ppm-hrs.
- c. EPA proposes to revise the level of the current secondary standard to within a range of 0.065 to 0.070 ppm. The basis for this is that EPA “recognizes that air quality data analyses suggest that air quality in terms of three-year average W126 index values of a range at or below 13 to 17 ppm-hrs would be provided by a secondary standard level within the range of 0.065 to 0.070 ppm, and that to the extent areas need to take action to attain a standard in the range of 0.065 to 0.070 ppm, those actions would also improve air quality as measured by the W126 metric.”
 - d. EPA also solicits comments on the alternative approach of revising the secondary standard to a W126-based form, averaged over three years, with a level within the range of 13 ppm-hrs to 17 ppm-hrs.
 - e. EPA also solicits comments on such a distinct secondary standard but with a level within the range extending below 13 ppm-hrs down to 7 ppm-hrs.
 - f. Further, EPA solicits comments on retaining the current secondary ozone standard of 0.075 ppm without revision.
 - g. CASAC’s advice to EPA on the secondary ozone standard included
 - i. support for the scientific conclusion in EPA’s Second Draft Policy Assessment that the current secondary standard is not adequate to protect against current and anticipated welfare effects of ozone on vegetation and
 - ii. the recommendation that the form of the current secondary standard be revised to “the biologically-relevant W126 index accumulated over a 12-hour period (8:00 a.m. to 8:00 p.m.) over the 3-month summation period of a single year resulting in the maximum value of W126 (henceforth W126)” and that the level of this form be within the range of 7 ppm-hrs to 15 ppm-hrs. “The CASAC does not support a level higher than 15 ppm-hrs.”
- III. Air Quality Index – EPA proposes changes to the Air Quality Index (AQI) to conform to the proposed changes to the level of the primary ozone standard. In particular, the agency proposes to set the AQI value of 100 at the same level as the revised 8-hour primary ozone standard and also make adjustments, based on health information from this NAAQS review, to AQI breakpoints for the Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, Very Unhealthy and Hazardous AQI categories; EPA does not propose to change the breakpoint at the top of the AQI (value equal to 500)
- IV. Implementation Issues – NACAA could include in its testimony comments related important issues that EPA should consider in the context of implementing (rather than setting) a revised ozone standard including background levels and the need for timely implementation rules and guidance.
- V. Other topics (any comments to be coordinated with the NACAA Monitoring and Permitting/NSR Committees)
- a. Proposed revisions to monitoring requirements

- i. Extend the length of the required ozone monitoring season in some states to be appropriate for the 2008 ozone NAAQS and any ozone NAAQS revision promulgated in 2015 – to match the times of year when data show ozone can approach unhealthy levels and so the public can be alerted.
 - ii. Streamline and modernize the Photochemical Assessment Monitoring Stations network.
 - iii. Revise the Federal Reference Method for ozone to establish a new, additional technique for measuring ambient ozone.
- b. Proposed grandfathering of preconstruction permitting applications that have already progressed significantly through the permit review process by the time the final standards are issued.