Congressional Clean Air Act Forum

John A. Paul RAPCA NACAA Fall Meeting, 2012

What I Will Cover

- Background
- What I Submitted in Writing
- What I Said at the Forum
- What I Heard from Others
- What I Wrote in Follow-up

Background on RAPCA

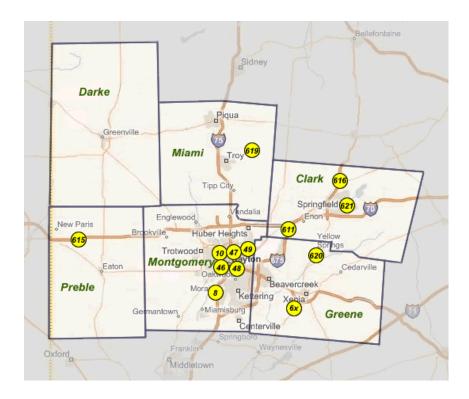
- Regional Air Pollution Control Agency
- Six-county local agency—Dayton, Ohio
 - Agency roots from the 1950's under the City
 - Health Department authority—Direct grant from USEPA and annual contract with Ohio EPA
 - One of nine local agencies in Ohio
- History of nonattainment for ozone and particulate matter and currently borderline air quality for both

Background on RAPCA

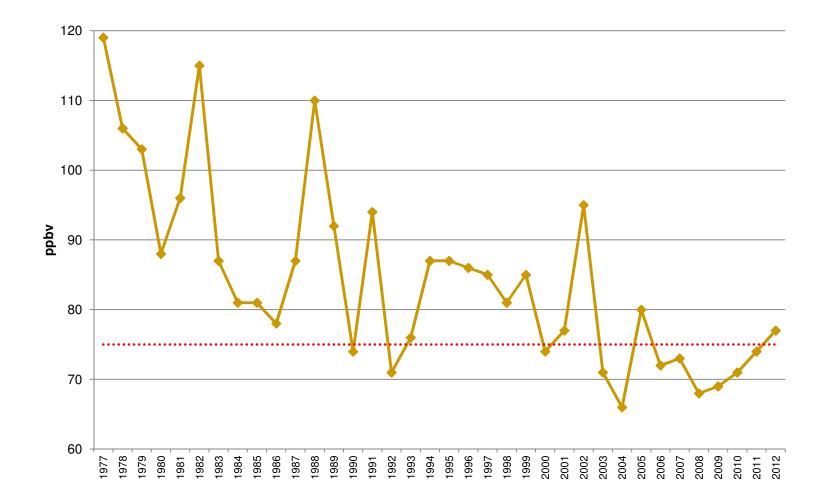
- At one time Dayton was a Major Manufacturing Area
- 15 Foundries
- 5 General Motors Plants
- National Cash Register
- Dayton Press (McCalls/Readers' Digest)
- Three Paper Mills
- Two Large Electric Generating Stations, Downtown Steam Stations
- Two Large Municipal Incinerators

RAPCA - Ambient Air Quality Monitoring Program

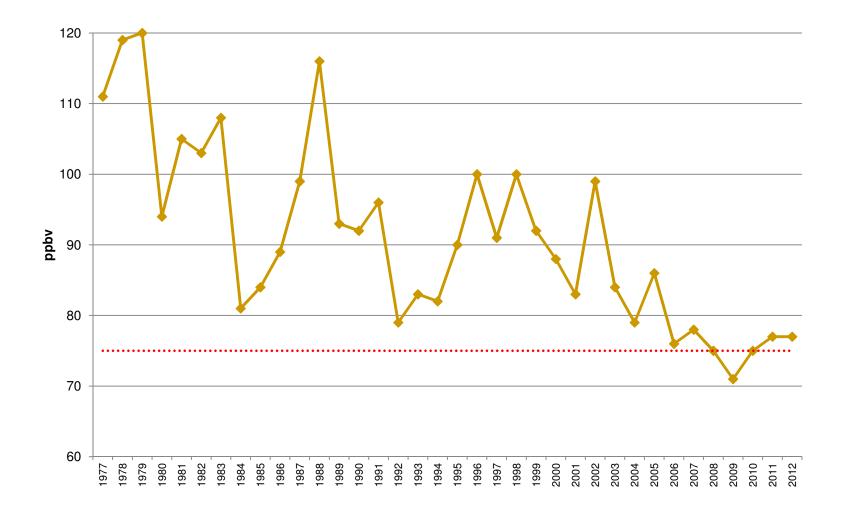
15 ambient air quality monitors at 12 locations:



Preble County, Ohio 4th max 8 hr Ozone



Clark County, Ohio 4th max 8 hr Ozone



VOC Emissions Inventory, tons per year

	Area	Mobile	Point	TOTAL
1977	15000	35000	23000	73000
1999 NEI	27000	27000	2000	56000
Current (2008 NEI)	16000	19000	1700	37000

NOx Emissions Inventory, tons per year

	Area	Mobile	Point	TOTAL
1977			18000	
1999 NEI	3000	40000	8000	51000
Current (2008 NEI)	3000	36000	5000	44000

What I Wrote

- Current EPA is doing their duty under the CAA
- Current NAAQS process is scientific and should be retained
- CAA is very detailed legislation
- NSR has a detailed history and is precedent driven—very complicated
- BACT is the bottom line for NSR
- Control of air pollution is our goal.

What I Said

- This is an approachable EPA that is responsive and good to work with
- Great working relationship with EPA through NACAA in coordination with other states and locals
- The importance of timeliness and certainty in regulation
- NAAQS—follow the science and set these standards at levels protective of public health

What I Said

- National controls on EGUs, vehicles, fuels are essential
- Funding is needed
- Climate change should be addressed in legislation
- Multi-pollutant approach to control

What I Heard

- The SIP process needs address
- Maintain state/local flexibility
- NAAQS promulgation and SIP guidance at the same time
- Integration of air quality, energy, and climate change
- Keep the NAAQS process, but extend the time to 10 years

What I Wrote in Follow-up

- NAAQS should remain science-based and not include costs
- Meeting the NAAQS is where costs are considered
- SIP process—look to NACAA/ECOS/EPA workgroup for recommendations
- National controls needed
- Resource and funding shortfalls are serious
- Climate change should be addressed in legislation