

Discussion Questions for NACAA Spring Membership Meeting Session
An Open Discussion with EPA on Implementation of the PM_{2.5} Standard

8:00 – 9:00 AM
Wednesday, May 8, 2013

On 2006 PM_{2.5} NAAQS SIPs in light of the Subpart 4 decision:

- 1) How best can EPA assist with SIP processing for the 2006 PM_{2.5} NAAQS?
 - a. Are there concerns from states who have already submitted SIPs (*i.e.*, do they address the Subpart 4 requirements)?
 - b. For states who have not submitted:
 - i. Are you planning to update submittals to address the Subpart 4 requirements? Are questions arising where EPA guidance is needed?
 - ii. What should be considered the Subpart 4 moderate area SIP due date for these areas? How should EPA approach findings of failure to submit and litigation over these deadlines?
 - iii. Alternatively, are there areas that EPA should reclassify as serious?
 - c. How should EPA convey answers to the states? Is this best done on a case-by-case basis in the affected areas or is national guidance or rulemaking needed?
- 2) Are you encountering NSR issue arising from the Subpart 4 decision?

On 2012 PM_{2.5} NAAQS implementation rulemaking:

- 3) What are the main concerns of the states in implementing the 2012 PM_{2.5} NAAQS?
- 4) Are there transition issues to the revised annual NAAQS that states are concerned about?