

Discussion Questions for NACAA Spring Membership Meeting Session
An Open Discussion with EPA on Implementation of the 1-Hour SO₂ Standard

2:30 – 3:30 PM
Tuesday, May 7, 2013

Nonattainment Guidance

- 1) Should the SO₂ nonattainment area guidance address the issue of the appropriate averaging period for the 1-hour standard? If so, how?
- 2) Should EPA allow for emission limits with longer averaging periods (i.e., 24-hr, 7-day, or 30-day)? If so, how can states demonstrate that such emission limits ensure compliance with the 1-hr SO₂ standard?
- 3) What other issues are states encountering in planning to address the existing sources that are likely causing your 1-hour NAAQS violations?

Technical Assistance Documents (TADs) for Future SO₂ designations

- 4) What kind of information is available from the sources in your state to calculate emissions? Based on the recommendations/equations presented in the TAD, do you have the necessary information to calculate actual emissions?
- 5) Which option are states considering pursuing for supplying the data that EPA anticipates requiring in its upcoming rule? Modeling, monitoring, or a combination? Why?
- 6) What states believe they already have appropriately located monitoring sites around target sources?
- 7) Who is considering a collaborative partnership with industry to either install monitors or convert industry monitors for use in compliance demonstrations?
- 8) For states that have already done some modeling to characterize actual air quality, what technical challenges have they encountered? What are they finding in terms of levels of modeled SO₂?

Designations

- 9) What should the states and EPA do if, before the planned modeling-based designations in 2017 (i.e., Round 2), you or we receive 3rd party modeling that alleges violations of the NAAQS in undesignated areas?
- 10) If EPA were to have to act on the designations more quickly than laid out in the SO₂ Designations and Implementation Strategy due to litigation, what do you want EPA to know about your interests with regard to a potentially shorter schedule?
 - a. Would it make sense to move more quickly for some areas than others? For example:
 - i. Areas with no chance of violations? How would we identify such areas?
 - ii. Areas where there are suspected NAAQS violations? How would we know before the data requirements rule data come in?