



# **SO<sub>2</sub> NAAQS Implementation Interactive Session**

NACAA Annual Meeting

May 7, 2013

St. Louis, MO

# Background



- Designations Strategy:
  - Areas with violating monitors: June 2013 deadline
    - February 7, 2013: 120-day letters to the states and tribes
      - First round will designate areas as “nonattainment” based on existing violating monitors
      - For other areas, EPA explained that it was not yet prepared to propose or take final designations actions (will do in future)
      - Comment period closed April 8
  - Rest of country: other areas may be violating
    - Need additional information to characterize
      - Can be done through modeling or monitoring
    - Upcoming rule will establish data requirements and schedule
    - Future designations depend on how long it takes to receive new data and develop and act on recommendations
      - With New Modeling: December 2017
      - With New Monitoring: December 2020

# Background (Continued)



- Nonattainment guidance:
  - Nonattainment area SIP planning guidance this summer, around the time the first round of designations takes effect.
  - Draft circulated September 2011
  - Will recirculate for additional state feedback, likely in May
- Rulemaking for future designations:
  - Data requirements rule to be proposed later this year per February 2013 strategy paper
  - Intent is to establish an orderly process by which states, as necessary, additionally characterize air quality around the largest SO<sub>2</sub> sources and provide this data to EPA for use in future rounds of designations for the rest of the country
- Technical Assistance Documents (TAD):
  - To support the characterization expected to be required by the data requirements rule, EPA is developing two technical assistance documents on
    1. properly siting additional air quality monitors at locations of expected maximum 1-hour SO<sub>2</sub> concentrations
    2. the use of modeling as a surrogate for ambient monitoring, using actual (or allowable) emissions and meteorological data from previous years to determine whether the air quality around the source meets or does not meet the standard
  - These documents will be issued for a 60-day public review period; we intend to issue revised drafts in July 2013 after consideration of comments from states and other parties

# SO<sub>2</sub> Nonattainment Area Guidance



## Discussion Questions

- Should the SO<sub>2</sub> nonattainment area guidance address the issue of appropriate averaging period for emissions limits under the 1-hour standard? If so, how?
  - 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 SO<sub>2</sub> standard?
- What other issues are states encountering in planning to address the existing sources that are likely causing your 1-hour NAAQS violations?

# SO<sub>2</sub> Technical Assistance Documents



## Discussion Questions

- Which option are states considering pursuing for supplying the data that EPA anticipates requiring in its upcoming rule? Modeling, monitoring, or a combination? Why?
- What kind of information is available from the sources in your states to calculate emissions? Based on the recommendations/equations presented in the TAD, do you have the necessary information to calculate actual emissions?
- What states believe they already have appropriately located monitoring sites around target sources?
- Who is considering a collaborative partnership with industry to either install monitors or convert industry monitors for use in designation recommendations?
- 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 actual (or allowable) SO<sub>2</sub>?

# Future Designations



## Discussion Questions

- 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?
- If EPA were to have to act on the designations more quickly than laid out in the SO<sub>2</sub> Designations and Implementation Strategy due to litigation, what do you want EPA to know about your interests with regard to a potentially shorter schedule?
  - Would it make sense to move more quickly for some areas than others? For example:
    - Areas with no chance of violations? How would we identify such areas?
    - Areas where there are suspected NAAQS violations? How would we know before the data requirements rule data come in?