

CIBO NAAQS Update

CIBO Environment Committee Meeting December 8, 2009



Current NAAQS Schedules

- NO₂ Primary
 - Proposed 6/26/09
 - Final 1/22/10 (Court-ordered schedule)
- SO₂ Primary
 - Proposed 11/16/09
 - Final 6/2/10 (Court-ordered schedule)
- Ozone Primary & Secondary
 - Proposal 12/21/09
 - Final 8/10
- PM_{2.5} (plus PM_{coarse}?)
 - Proposal 1/2010
 - Final 10/2011



- Replace existing annual & 24-hour primary standards with new 1-hour standard at level between 50 and 100 ppb (consistent with CASAC recommendations)
- Separate secondary SO₂ standard due to be promulgated in 2012
- SO₂ is also a primary precursor to PM_{2.5}, especially in the east
- Fossil fuel combustion at EGUs (66%) and industrial boilers (29%) are primary sources of SO₂ emissions



- Current standards are 140 ppb 24-hour and 30 ppb annual, both set in 1971
- EPA considered separate 5 minute standard in 1996, but decided not to promulgate despite internal analyses showing up to 166,000 asthmatics exposed to concentrations of concern. EPA was sued and rule was remanded in 1998 for further explanation



- Strong evidence of link between short-term exposures and adverse respiratory responses, including asthma, airway restrictions, respiratory illnesses, hospital visits
- At-risk populations include asthmatics, elderly, children
- CASAC said there was a "clearly sufficient" rationale for a standard at 50 ppb; an upper limit of 150 ppb "could be justified" based on weight of evidence, uncertainties, policy choices



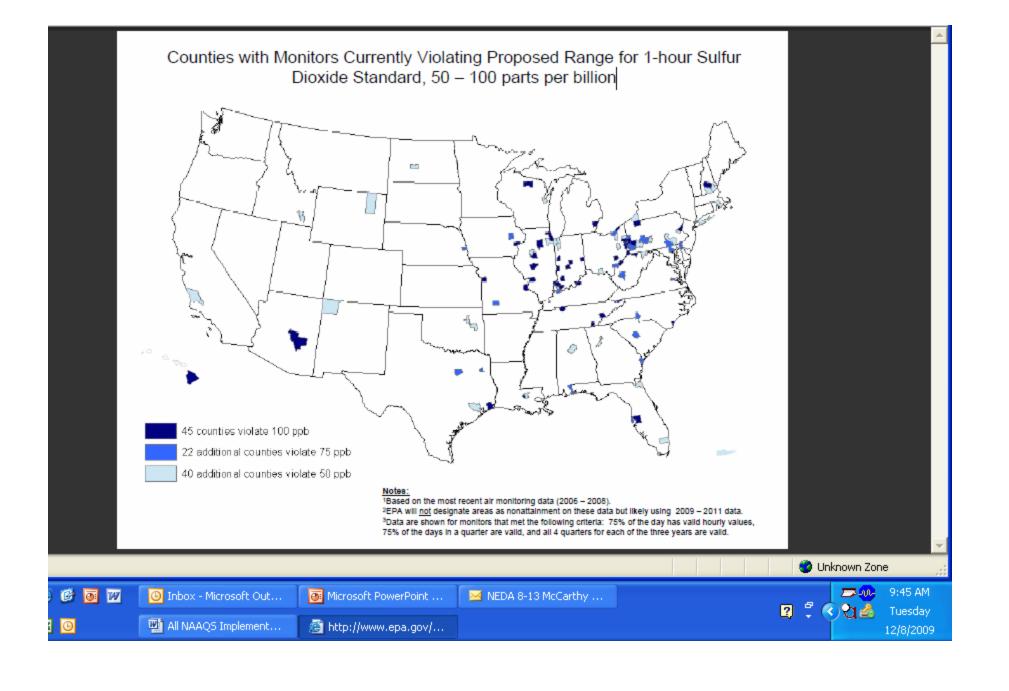
- So EPA proposing standard in range of 50 to 100 ppb with elimination of 24-hour and annual standard
- Taking comment on standard at 150 ppb, but would keep the 24-hour standard if promulgated at that level (i.e. revoke only the annual standard)
- Two forms of standard proposed: 99% concentration or 4th highest daily max in year (both 3-year averages)



- EPA also proposes to update the current monitoring network, which is not designed to address source-oriented maximum short-term concentrations (2/3 of current 488 monitors not properly sited for new standard)
- 231 monitors to be sited based on a combination of population and emissions; 117 additional monitors to be located w/l states based on state's contributions to national emissions



- Implementation timeline:
 - Final rule 6/2/2010
 - State designation recommendations: 6/11
 - Final designations: 6/2012
 - SIPs due: Winter 2014
 - Attainment date: Summer 2017





CAIR Update

- Current schedule:
 - Proposal 1st quarter 2010
 - Final 1st quarter 2011
- Key issues:
 - Inclusion of industrial boilers
 - Will standards be set to address upcoming ozone and PM_{2.5} standards?
 - Will trading be allowed?