New SO2 NAAQS

CIBO Environment Committee Meeting

June 9, 2010

New SO2 NAAQS

- One-hour standard set at 75 ppb, midpoint between 50 to 100 ppb range proposed by EPA (industry suggested 200 to 400 ppb)
- In line with CASAC recommendations
- Existing 24-hour and annual standards will be revoked
- Monetized health benefits between $13 and $33 billion (fewer hospital admissions & sick days, reduced asthma)

SO2 NAAQS Details

- Will address short-term (5 minute to 24 hour) impacts, primary concern from health effects standpoint
- Secondary standards (SO2 and NOx) due March 2012
- States will need to beef up their monitoring networks by 1/1/2013, though EPA predicts need for only 41 new monitors (470 existing now)

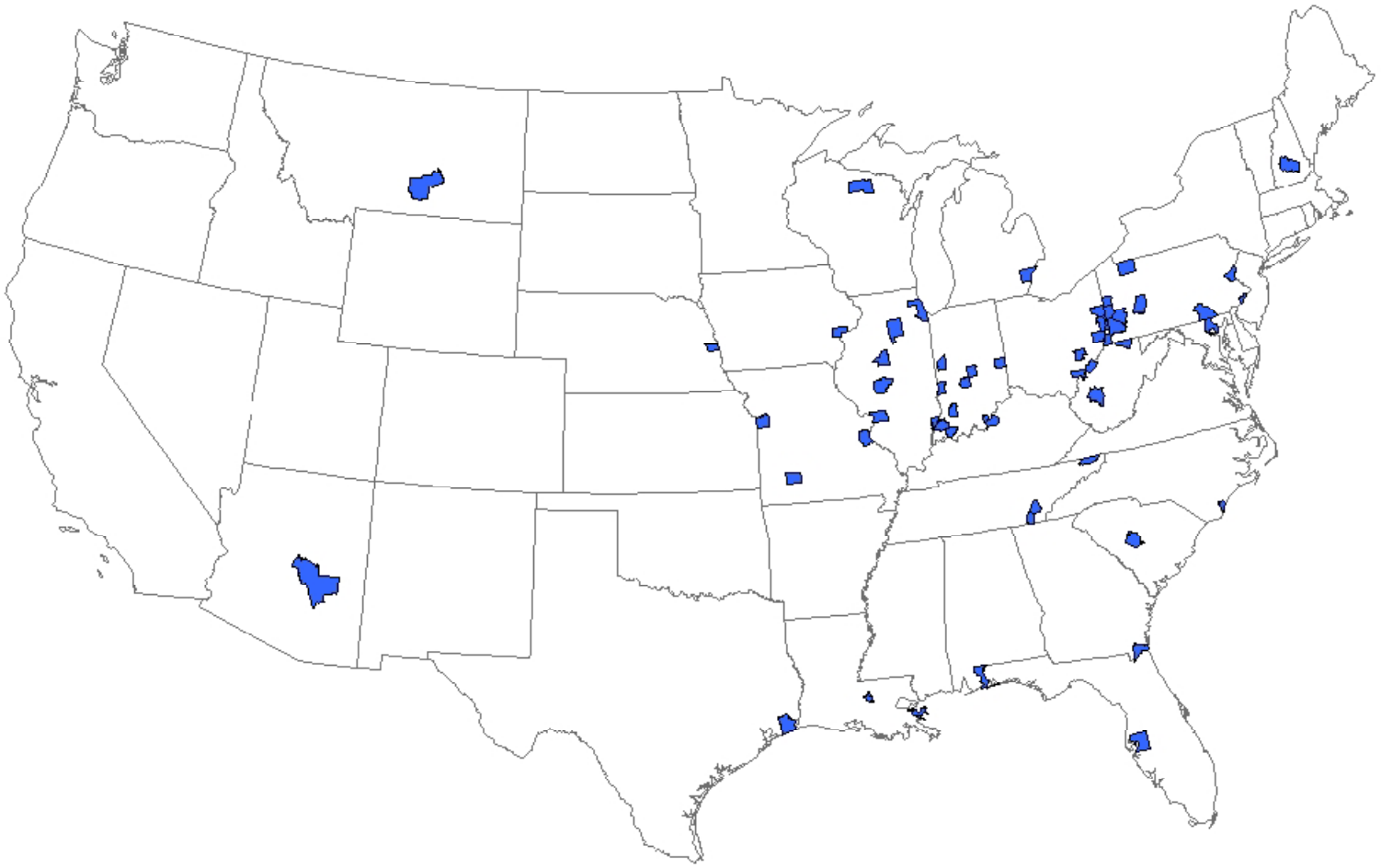
More SO2 NAAQS Details

- EPA designations to be completed by June 2012 (2008-2010 data)
- Nonattainment area SIPs will be due by “early 2014” demonstrating attainment by August 2017
- All other states (with attainment or unclassifiable areas) will be required to submit maintenance SIPs by June 2013
  - Refined modeling demonstration that all sources potentially contributing to violations are sufficiently controlled
  - Account for reductions from national & regional regulations
  - Include as necessary enforceable limits, timetables for compliance, appropriate testing

More SO2 NAAQS Details

- Nonattainment/attainment demonstrations will be based on both measured/monitored concentrations and refined modeling data
- EPA prefers to have medium to large source emissions modeled rather than monitored (problem siting monitors to pick up worst-case conditions)

SO_2 Nonattainment Areas at 75 ppb (60 of 249 monitored counties, 2007-2009 data)



New SO2 NAAQS Issues

- Variety of implementation issues
  - Rule effective 60 days after publication, but no SILs, increments, etc
  - No guidance matching up new tightened standard with revised modeling techniques—could be months
  - Reliance on conservative modeling rather than monitoring raises threat of non-compliance
  - Sources with any sulfur in their fuels will have difficulty modeling compliance as part of a PSD application