

NAAQS & MOG Updates

CIBO Annual Meeting

October 26, 2018

Tucson, Arizona

NAAQS Standard Update

- EPA plans accelerated reviews of the ozone and PM2.5 NAAQS by the end of 2020; this is consistent with the April 2018 Presidential memo on NAAQS and the Pruitt “back to basics” memo in May 2018
- EPA has decided to eliminate the special ozone and PM2.5 NAAQS CASAC subcommittees; instead, the NAAQS science reviews will be conducted by the full 7-member CASAC.
- A key piece in the review will be the statutory charge to consider the adverse impacts associated with implementation of a new standard; EPA released a “Call for Information” to get updated information to assist CASAC in this review.
- Best guess is that the ozone review will find the current standard sufficiently protective; some chance it will be raised. PM2.5 NAAQS is much more problematic, with recent studies finding health effects at annual standard levels as low as $5 \mu\text{g}/\text{m}^3$ or below.

NAAQS Implementation Update

- EPA is very active on the NAAQS implementation front:
 - In March and August EPA released guidance for the states on flexibilities associated with preparing 'good neighbor' SIPs
 - A final SIP requirements rule for the 2015 ozone standard should be released very soon
 - EPA is doing lots of work on the exceptional events front—stratospheric ozone intrusions, prescribed and wild fires, high wind guidance, etc.
 - EPA is focused on making Section 179(B), international emissions, as flexible as possible—expect guidance shortly
 - EPA is considering guidance on generating emission offsets outside a nonattainment area

MOG Activities Update

- Recent MOG activities have focused on 4 main areas:
 - Helping states (and EPA) figure out 'good neighbor' SIPs
 - Providing rationales for EPA denial of eastern states' Section 126 petitions
 - Doing detailed modeling work demonstrating that virtually the entire eastern half of the country will come into attainment by 2023
 - Providing EPA with modeling data showing the impact of international emissions on current nonattainment areas, and helping to provide a policy rationale for EPA to use this information to states' benefit