

NAAQS & Climate Updates

CIBO Environment Committee Meeting

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Amazon Central, Virginia

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.

The Ozone & PM2.5 NAAQS

- If the ozone NAAQS review is completed during this Administration, best guess is that it will remain at 70 ppb.
- 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. Further, for the first time the draft ISA references “ultrafine PM” as a concern, with exposure linked to neurological issues.
- Looking at current EPA-derived design values (2015-2017 data), if the annual standard was set at 9 (a plausible outcome, the following states would have nonattainment areas: Alabama, Alaska, Arizona, Arkansas, California, DC, Georgia, Hawaii, Idaho, Illinois, Indiana, Kentucky, Louisiana, Maryland, Michigan, Missouri, Montana, Nevada, NJ, New Mexico, NY, Ohio, Oregon, Pennsylvania, Rhode Island, S Carolina, Tennessee, Texas, Washington, West Virginia

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 was released last month
 - EPA has put out a blueprint for states’ use as they work on the second round of regional haze submittals
 - 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; potentially very useful for states filing good neighbor SIPs
 - EPA is considering guidance on generating emission offsets outside a nonattainment area
 - Much more to come—this is an EPA focus issue, providing implementation certainty to states; one area for future guidance is background and natural emissions—how should states account for them

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 without the need for additional controls
 - 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

Climate Update

- Efforts to roll back or revise the Obama “Climate Action Plan” components continue:
 - No back-tracking on withdrawal from the Paris Climate Accord
 - Continuing efforts to soften impacts of EPA/DOI methane rules
 - Social cost of carbon methodologies revamped
 - Repeal of the CPP, proposed replacement with the Affordable Clean Energy (ACE) rule
 - Revisions to 111(b) GHG NSPS for new, modified, reconstructed EGUs
 - Establishment of GHG PSD significant emission rates
 - Rulemaking on the carbon neutrality of biomass
 - Revised CAFÉ/GHG standards for passenger cars and light-duty trucks