US ERA ARCHIVE DOCUMENT

PREVENTION OF AIR POLLUTION EMERGENCY EPISODES (Subpart H and Appendix L, 40 CFR part 51)

DRAFT CONCEPT/ISSUE PAPER

9/16/98

WHAT THE CURRENT SYSTEM DOES

- Prevents ambient concentrations from reaching the significant harm level (SHL)
- Area classification based on ambient concentration levels below the SHL
- Areas exceeding established levels must prepare episode plans including contingency plans for major sources
- States must provide for forecasting, communication, recordkeeping and reporting
- Recommends periodic reevaluation of episode plans

THE GENERAL PROBLEM

- Current program developed in the 70's based on the NAAQS from that era
- Current system doesn't fit with current NAAQS/health info
- Ambient levels are generally decreasing areas/sources less likely to need episode plans. . . but must still develop them
- Episode plan reevaluation doesn't occur on any comprehensive basis

THE RECOMMENDED FIX

- Update criteria for area classifications
- Modify requirements for contingency plans so that only largest sources need develop them. . .
- Move Appendix L (example State emergency episode regulation) from CFR to a guidance document
- Recommend reevaluation every 3 years