

US EPA ARCHIVE DOCUMENT

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Guidance on Nonattainment Boundaries for the PM-2.5 NAAQS

Background

Subpart 1 addresses the process but does not prescribe specific boundaries for designating PM-2.5 NAAQS nonattainment areas. It does require States to submit lists of all areas (or portions of areas) with their designations (timing modified by the Inhoffe amendment) and authorizes EPA to make modifications.

Success for this discussion is to:

1. Review role and purpose of nonattainment designations for the PM-2.5 standard.
2. Remind ourselves of the statutory language and information related to boundaries.
3. Introduce preliminary boundary options, given that EPA will be revisiting the topic of boundary determinations for PM-2.5 once data becomes available.

Importance of designations:

1. Role and purpose of nonattainment designations

Under the PM-2.5 standard:

- a. Informs citizens that unhealthy air quality occurs in the area.
- b. Defines the basis for planning activities--inventories and modeling for an attainment demonstration, SIP revision development and adoption, plans for reasonable further progress, maintenance plans at redesignation, public hearings, and budget and legislature-related activities.
- c. Fixes attainment dates (based on an area's classification).
- d. Requires States to implement measures and programs to reduce emissions in the area.
- e. Requires application of part D new source review (NSR).
- f. Requires conformity determinations.

2. Statutory Language in section 107 (d)(1)

“Following promulgation of new or revised standards initial designations are to be submitted by the Governors no later than 1 year after such promulgation as nonattainment, any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the primary or secondary NAAQS, (emphasis added) attainment, any area (other than an area identified as nonattainment) that meets the

primary or secondary NAAQS, or unclassifiable, any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary NAAQS.”

**3. Introduction to preliminary boundary options**

- ▶ **Transitional classified areas are predicted to attain with reductions from NOx SIP call, Acid Rain program emissions reductions, or other possible particulate matter controls:**
  - **Boundaries -- County or counties with monitored violations with option for State to add counties or parts of counties containing source(s) causing or contributing to nonattainment .**
- ▶ **International transport areas -- Status quo from the designated nonattainment areas for the Previous PM-10 standard.**

**More detail/overview of preliminary options**

- a. **Transitional areas - predicted to have reductions from NOx SIP call, Acid Rain program emissions reductions, or other possible PM controls.**
  - **Minimal size, e.g., county or counties with the monitored violation(s) with option for States to add counties or parts of counties to account for source impacts on the nonattainment area. In most cases, accept boundaries recommended by the States.**
  - **Provides an option for States that prefer flexibility. Some States want to model and may find a need to control in a larger area.**
- b. **The CAA requirement to bring in both the nonattaining and contributing areas is met because - attainment may be (predicted by EPA) with reductions achieved via the NOx SIP call, Acid Rain reductions, and other PM controls. The regional aspect of the SIP call and Acid Rain reductions pulls in sources causing or contributing to nonattainment. NOx sources involved in the SIP call are not nearby; if they are considered to be nearby, the designated nonattainment area could potentially encompass the entire State.**
  - **Violation of the standard is not a long-term problem -- nonattainment is “transitional”.**
  - **Nonattainment NSR is not expected to be an issue.**
  - **Is potentially an implementation problem in the event a program of local measures is needed in the future. Very important to have guidance on the street on the consequences of failure to attain.**
- d. **Traditional areas**
  - **At least the county or counties measuring the violation of the standard, also any adjacent areas causing or contributing to nonattainment.**
  - **Implementation of local controls are presumed to be adequate to reduce emissions for attainment purposes where the area is not affected significantly by emissions from up**

wind sources.

- Consistent with EPA modeling. Supports new monitor siting guidance from EMAD.
- Traditional implies business as usual in terms of designation of the area, implementation of controls and development of the SIP.

**f. International transport areas**

- Status quo from the designated nonattainment areas from the previous PM-10 standard.