

# **Do Not Quote or Cite**

## July 21, 1998

### Preliminary principles for nonattainment boundaries for the PM-2.5 NAAQS

#### I. Background

Section 107(d) of the Clean Air Act addresses the process for designating areas for PM-2.5, but does not prescribe specific boundaries for 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 as necessary.

### **Information related to PM-2.5:**

- ➡ PM-2.5 in the East:
  - 1. The pollutant is expected to behave similar to Ozone:
    - Regional transport is expected to be a part of any problem.
    - Regional planning will most likely be needed to address the problem.
    - Some benefit from NOx SIP call, acid rain program emissions reductions, various other PM controls.
  - 2. Local components could be important:
    - Contributions from mobile sources, industrial emissions, ect.
- ➡ PM-2.5 in the West:
  - **1.** Regional transport is less of a problem for the health based standard. Health based problems limited to urban areas.
  - 2. It is anticipated that reductions from the Regional Haze program may help to deal with background contributions.
- **II.** Major principles to consider in setting the boundaries for PM-2.5:
  - **1.** The boundaries must satisfy the Clean Air Act requirement to notify the public of violations of the NAAQS in the geographic area.
  - 2. Clean Air Act requirements apply to the area once EPA determines that a violation of the NAAQS has occurred and designates the area as nonattainment. These requirements include, but are not limited to NSR, Conformity, fixed attainment dates, RFP, contingency measures, ect.

3. The boundaries should be able to address the Clean Air Act definition of a nonattainment area, which states that a nonattainment area is an area that does not meet (or contributes to the ambient air quality in a nearby area that does not meet) the NAAQS for PM-2.5.

4. The boundaries should take into consideration the possible need for local and regional planning to control emissions due to the transport nature of the pollutant.

## III. Boundary options under consideration:

The nonattainment area boundaries for PM-2.5 should take into consideration the transport nature of the pollutant and the fact that regional emissions will contribute to violations in the nonattainment area; especially in the east. EPA is preliminarily considering a boundary policy similar to that being proposed for Ozone. However, while the Ozone boundary proposal takes into consideration the use of the classification structure of transitional areas, traditional areas, and international areas, it is not certain that this same classification structure will be used for PM-2.5.

**Option:** 

- Transitional area for PM-2.5: Would apply to areas which are predicted to attain with reductions from the 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 .
- Traditional areas for PM-2.5: Would apply to areas where 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.
  - Boundaries -- At least the county or counties with monitored violations of the NAAQS and adjacent areas causing or contributing to nonattainment. Covers suberban areas.
- ► International transport areas -- Status quo from the previous particulate matter standard, where an area can demonstrate that it would be able to attain, "but for" the emissions emanating from outside of the country.

**Other Options...?**