

US EPA ARCHIVE DOCUMENT

**This paper reflects preliminary agency thoughts and ideas and the questions posed have not been thoroughly analyzed for legal defensibility**

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## **Addressing Transport in the 8-Hour Ozone Implementation Program**

### **Issue**

How should EPA address transport of ozone and its precursors in the 8-hour ozone implementation program?

### **Background**

Although much progress has been made to improve air quality, many areas have yet to attain the 1-hour ozone standard and many are not attaining the 8-hour ozone standard. Progress in attaining the standards is limited by the fact that ozone and the pollutants that form ozone (precursors) can be carried long distances from their original sources by the wind. The process of ozone and ozone precursors traveling to downwind areas is referred to as ozone transport. Primary precursors of ozone are nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs). The purpose of this session is to pose several questions concerning possible approaches whereby transport of ozone and its precursors could be addressed in the 8-hour ozone implementation program.

### **Questions**

- Should EPA designate large nonattainment areas, including both the violating areas and the contributing areas? This could, for example, ensure the entire area has one attainment date and promote coordinated planning among all the jurisdictions that constitute such an area.
- Should EPA rely on section 110(a)(2)(D)(i) of the CAA to make either individual or another national SIP call?
- Should EPA rely on the existing regional haze Regional Planning Organizations or establish new multi-State organizations for the 8-hour ozone standard to analyze and resolve transport?
- How should EPA factor in the impact of transport on attainment dates when designating nonattainment areas from the 8-hour ozone standard?
- Should we encourage States to perform regional scale modeling to address transport?
- To what extent should EPA rely on States to invoke section 126 of the CAA to address transport?

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- Should EPA consider the establishment of new transport regions for ozone other than the Ozone Transport Region as defined in section 184 of the Clean Air Act?
- Should EPA expand ozone monitoring requirements in transport areas?

#### **Link to Other Issues**

The resolution of the transport issue has implications for a number of other issues under consideration, e.g., designations, classifications and attainment dates.