Air Quality Program Update

Shelley Schneider Air Quality Division Administrator

Environmental Update – May 3, 2011

Presentation Overview

 Latest on National Ambient Air Quality Standards (NAAQS) Revisions

- Implications

- Compliance Reminders
- Permitting Reminders
- Opportunities to Connect



- Sections 108 & 109 Clean Air Act
- EPA established "criteria pollutants"
 - Lead (Pb)
 - Nitrogen Oxides(NO₂)
 - Carbon Monoxide (CO)
 - Sulfur Dioxide (SO₂)
 - Particulate Matter (PM)
 - Ozone (O₃)
- Primary standards to protect health
- Secondary to protect welfare & environment

Lead

- Revised October 2008
 - Primary & Secondary Stds same
 - 0.15 µg/m³ rolling 3-month average
- December 2010, ambient monitoring rules expanded
 - States required to evaluate facilities with emissions of 0.5 tpy (previously 1.0 tpy)
 - Monitor in large urban areas

Lead (cont.)

Implications for Nebraska



- Monitoring in Fremont & Auburn
- Evaluating need for monitoring in Norfolk
- Monitoring in Omaha at multi-pollutant site (Jan 2011)
- Data so far has shown attainment
- EPA will review/propose revisions to standard by November 2013

<u>NO</u>2

- Primary Revised January 2010
 - 100 ppb 1-hr (3yr ave of 98th percentile values of daily maximums)
 - 53 ppb annual average
- Secondary still under review
 - EPA plans to propose NO2/SO2 secondary standards in July 2011
 - Final Policy Assessment released in Feb 2011

NO2 (cont.)

- Nebraska Implications
 - Begin 'near-roadway' monitoring in Omaha area by Jan 2013
 - New projects w/ NO₂ emissions may be required to model
 - Intermittent emission units may be excluded
 - More to come....



<u>CO</u>

- Current Primary Standards
 - 9 ppm 8-hr (nte more than once/yr)
 - 35 ppm 1-hr (nte more than once/yr)
- Jan 2011 Proposed NO CHANGE
 - EPA must issue final rule by Aug 12, 2011
- EPA proposed revisions to monitoring requirements
 - Co-locate with NO₂ near roadways

<u>SO2</u>

- Current Primary Standard
 - <u>75 ppb 1-hr ave (3yr ave of 99th percentile of daily maximums)</u>
 - New standard effective Aug 23, 2010
- "Hybrid" approach for implementation
 - Nonattainment = monitored <u>OR</u> modeled violations
 - Attainment = modeled <u>AND</u> modeled evidence of no violations
 - Unclassifiable = all other areas, INITIALLY only

Latest on the NAAQS SO2 (cont.)

- Nebraska Implications
 - 2007-2009 monitoring data indicated concern with new 1-hr, 75 ppb standard
 - 2008-2010 monitoring data shows "clean"
 - Initially "unclassifiable" for entire state



<u>SO2 (cont.)</u>

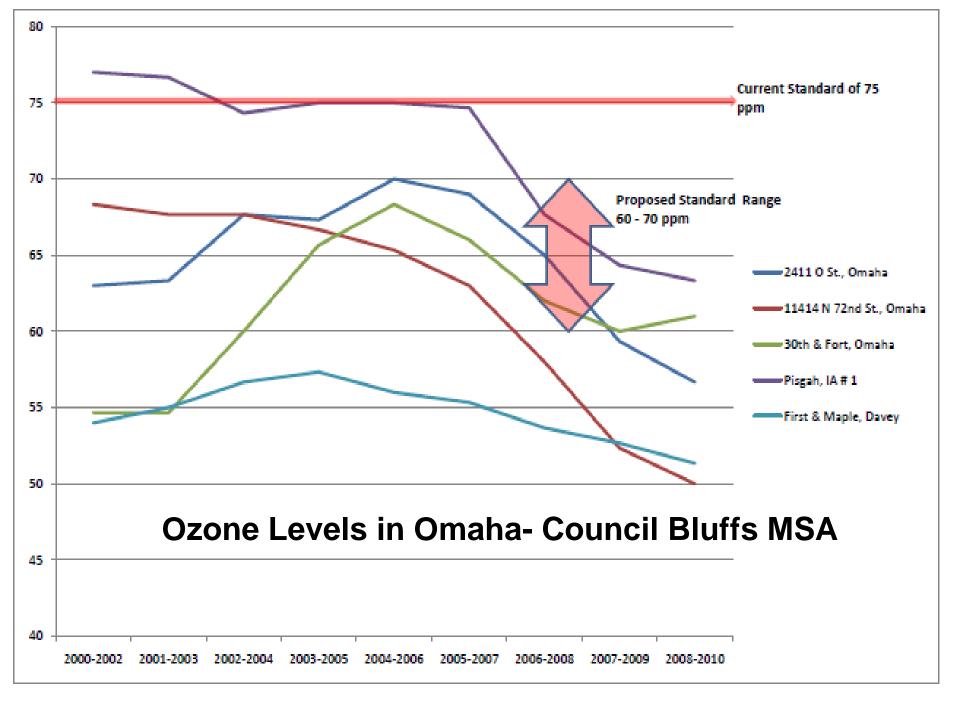
- Nebraska Implications
 - By June 2013
 - Submit a plan to EPA Region 7
 - Modeling of sources of SO2
 - Done using potential emissions
 - Resolution of any 'non-attainment' with
 enforceable measures & contingency plan
 - Modeling & monitoring data must be "clean"

<u>SO2 (cont.)</u>

- Current Secondary Standard
 - 0.5 ppm 3-hr ave (nte more than once per yr)
 - Under review with NO2 standard
 - Proposal expected in July 2011

<u>Ozone</u>

- EPA proposed revisions in Jan 2010
 - Current stds = 0.075 ppm 8hr ave
 - Proposed primary w/i 0.060 -0.070 ppm 8hr ave
 - Secondary std w/i 7-15 ppm-hrs
- Postponed final action three times
 - Now planned for July 2011
 - Implementation & Monitoring Rules expected as well



Ozone (cont.)

- National Park Service monitoring
 - Agate Fossil Beds near Scottsbluff
 - 2007 2009, 4th highest values 62 ppb 67 ppb
 - 3yr ave, 65 ppb
- NDEQ working with Iowa, EPA, MAPA, and Iocal Omaha-Council Bluffs area interested parties
 - Community Based Planning approach
 - Public Outreach Campaign underway
 - http://littlestepsbigimpact.com/

WHAT CAN IDO TO REDUCE MY IMPACT?

Little Steps. Big Impact.



What can I do to reduce my impact?

HOME

Find Out Now »



Ground-level ozone is a pollutant that has harmful impacts to people of all ages, but especially to vulnerable populations such as the elderly, children, and those with respiratory illnesses. The Metropolitan Area Planning Agency (MAPA) is working with several state, local, and federal agencies to reduce ozone in the Omaha-Council Bluffs metropolitan area. If everyone takes little steps, we can all have a big impact in reducing ozone in our community.

http://Littlestepsbigimpact.com

Who Is MAPA?

Particulate Matter

- Current standards
 - PM10 = 150 ug/m3 24-hr ave (nte more than once/year averaged over 3 years)
 - PM2.5 = 15.0 ug/m3 annual ave (3-yr ave)
 - PM2.5 = 35 ug/m3 24-hr ave (3yr ave of 98th percentile values of 24-hr values)



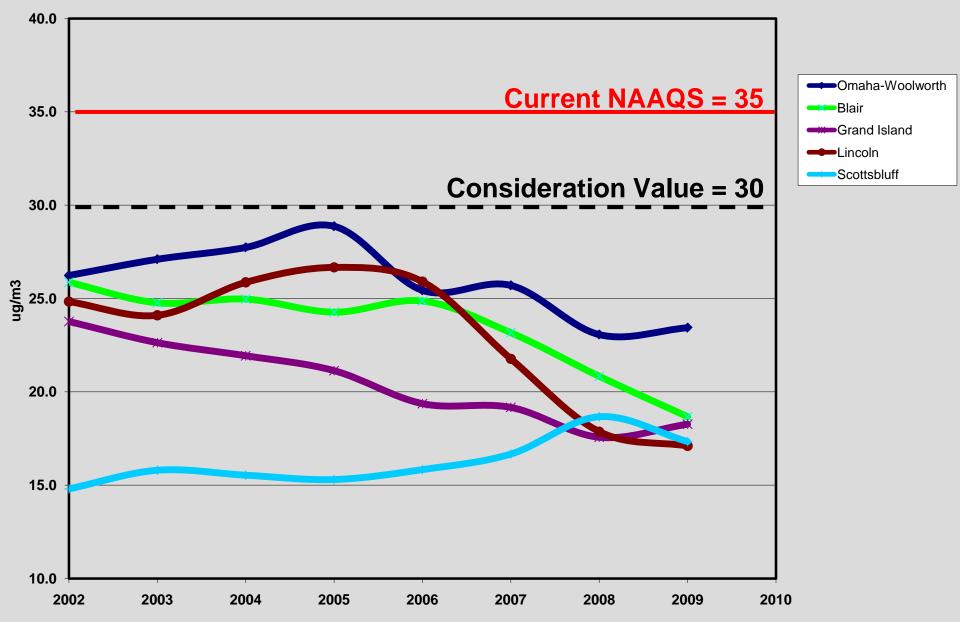
Particulate Matter (cont.)

- EPA expected to propose revisions Summer 2011
- Final Policy Assessment released April 2011
 - Call into question adequacy of PM2.5 stds
 - Consider lowering annual std from 15 ug/m3 to 11-13 ug/m3
 - Depending upon where annual std is set, consider a 24hr std 30-35 ug/m3
 - EPA staff concluded lower part of annual range (11-12) and retaining current 24-hr std, supported strongest

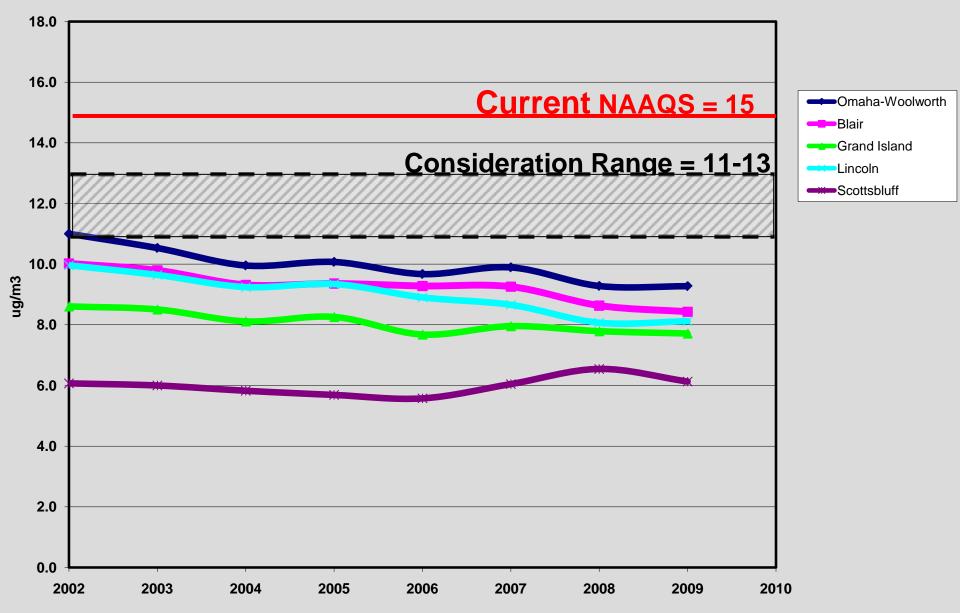
Particulate Matter (cont.)

- Recognizes PM10 std meant to protect
 against PM10-2.5 exposure
 - Consider changing the form & lowering the level
 - (current 150 ug/m3 24-hr, nte more than once per year average over 3 years)
 - Consider
 - 65-85 ug/m3 24-hr std, 98th percentile form
 - EPA staff concluded upper range supported strongest

PM2.5 24-hr Design Values



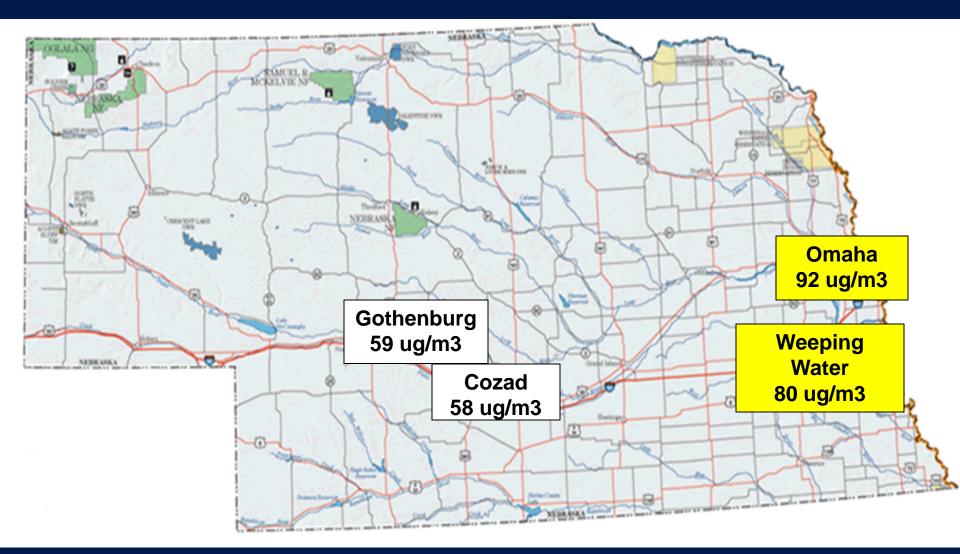
PM2.5 Annual Design Values



Particulate Matter (cont.)

- Nebraska Implications
 - 2010 preliminary data indicates <u>potential</u> issues with <u>current</u> PM10 standard
 - Cass County
 - Still reviewing QA
 - If data shows violation of standard, Nebraska may be subject to a federal "SIP call"
 - Would need to show attainment with old standard, even if standard is changed

2007 thru 2009 PM10 Monitor Values – 24-hr period – ug/m3 (98th Percentile Values Ave over 3yr)



NAAQS Take Home Message

- Nebraska has benefited from long history of attainment (minor exceptions)
- Health science is causing EPA to review adequacy of standards carefully
- As NAAQS go down, Nebraska's ability to maintain attainment becomes more difficult
- Need to pay close attention

What is Non-Attainment?

- "Non-attainment" means noncompliance with ambient standard
 - Different than violating a permit
 - State develops a plan to 'attain'
- Pollution controls lowest achievable
 - Reasonably achievable controls
 - Offsets for new/expanding facilities
 - Contingency measures
- Economic development
- Conformity ozone



Who is Affected by Non-Attainment?

- Citizens, businesses, government and industry in nonattainment area
- Emitters of pollutants of concern
- Goal Remain in attainment, with clean, healthy air to breathe!



Compliance Reminders

Title 129, Chapter 34:

- Stack (performance) testing notifications
 - "The owner or operator of a source shall provide the Department 30 days notice prior to testing to afford the Department an opportunity to have an observer present"



Compliance Reminders

Notifications

- Date of testing no "during the week of"
 - Which unit on which day
- Normal business hours unless otherwise notified
- No notices less than 30 days
- Will accept <u>one</u> additional day for contingencies
- Doesn't affect federally available exceptions
- Certified copy of test results submitted w/i 45 days

Permitting Reminders

- Greenhouse Gas Emissions
 - Jan 2011 GHG Tailoring Rule adopted into T129
 - In Jan 2011, EPA proposed 3 year deferral for permitting GHG emissions from biogenic sources
 - All permits are addressing GHGs where appropriate
 - Applications updated



Permitting Reminders

- GHG Phase 1 until July 1, 2011
 - "anyway sources"
 - PSD and Title V issued after Jan 2nd
 - PSD Applicability
 - PSD for non-GHGs
 - Modifications with increases of 75,000 tpy CO_{2equiv} or more, apply BACT
 - Title V Applicability
 - GHGs themselves do not trigger
 - "applicable requirements" for GHGs included in Title V permit

Permitting Reminders

• GHG Phase 2 – After July 1, 2011

- PSD Applicability
 - GHGs trigger
 - New construction 100,000 tpy CO_{2equiv} potential emissions
 - Modifications with increases of 75,000 tpy CO_{2equiv} potential emissions
- Title V Applicability
 - GHGs trigger
 - 100,000 tpy CO_{2equiv} potential emissions

Opportunity to Connect

- Air Waves E-Newsletter & List Serv
 - Topics? Not on List? Contact Tracy Thompson
 - 402-471-4272 or tracy.thompson@nebraska.gov
- Air Program Updates
 - Early to Mid-August 2011
 - 3 locations
 - North Platte or Ogallala
 - Kearney or Grand Island
 - Lincoln
 - Input on Agenda? Contact Tim Kalb Soon!
 - 402-471-3139 or tim.kalb@nebraska.gov



Questions?