

# CAAAC Air Quality Management Workgroup Update

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# NAS Report as Foundation

- NAS report catalyst for AQM Workgroup -- response to their recommendations
- Key challenges identified by NAS:
  - Meeting NAAQS for O<sub>3</sub> and PM 2.5 and reducing regional haze
  - Designing and implementing HAPs controls
  - Protecting public health and welfare in the absence of a threshold exposure
  - Assessing and protecting ecosystem health
  - Mitigating intercontinental and cross-border transport
  - Maintaining AQM efficiency in the face of changing climate

# Key NAS Recommendations

- Five main areas of NAS recommendations
  - Strengthen scientific and technical capacity
  - Expand national and multi-state control strategies
  - Transform the SIP process
  - Develop integrated program for criteria and hazardous air pollutants
  - Enhance protection of ecosystems and public welfare

# AQM Work Group Effort

- Two subgroups with a total of 7 work teams formed to turn report recommendations into actions
  - Policy and Planning Subgroup
    - Short term SIP Process Team
    - Regional/National Strategies Team
    - Innovative & Multi-pollutant Approaches Team
    - Long-Term AQM Framework
  - Science and Technology Subgroup
    - Emissions, Monitoring & Modeling Team
    - Ecosystems Team
    - Health and Exposure Team

# Scope of AQM Work

- Approximately 50+ recommendations have been identified by the AQM Work Group
  - 17 from SIP process team
  - 18 from national/regional strategies team
  - 6 from multi-pollutant and innovative strategies team
  - 3 proposals for long-term AQM framework team
  - 1 from ecosystems team
  - 8 from science and technology subgroup

# What's Most Critical to OTC?

- Transport is mentioned as challenge in NAS report, but not addressed directly in the subgroups' recommendations
- At least 9 recommendations have some critical significance to the OTC
  - 4 present opportunities
  - 4 are of concern
  - 1 could be either, depending on how done

# Some Opportunities

- SIP-4: Coordinate air planning for areas whose SIPs share a common airshed
- RN-4: Evaluate ICI boiler category for possible regional/national control strategies
- RN-5: Evaluate architectural surface coating category for possible regional/national control strategies
- RN-10: Evaluate EGU category for possible regional/national control strategies

# Some Concerns

- SIP-3: Align O<sub>3</sub>, PM and regional haze elements, submittal and designation dates
- SIP-8A: Where EPA's national modeling for O<sub>3</sub> and PM 2.5 predict attainment, states should be able to use EPA modeling in lieu of state specific modeling
- SIP-8B: Where EPA's national modeling for O<sub>3</sub> and PM 2.5 predicts minimal nonattainment, EPA should project tons required for attainment
- INV-3: EPA and states should work to reduce emphasis on SIP credit and focus on co-benefits of innovative measures



# Both: Concern and/or Opportunity

- SIP-14: EPA in consultation with States and Tribes should expand ROP to permit use of emissions reductions from outside the NAA to meet offset requirements
  - If takes relative amount of reduction from outside NAA into account – opportunity
  - If overcredits the amount of reduction - concern

# AQM Next Steps

- Nov 15 – submit draft recommendations to CAAAC members
- Nov 22 – Convene conference call of interested CAAAC members
- Nov 29 – comments due from CAAC
- Nov 30 – AQM meeting in RTP
- Dec 6 – Submit report to CAAAC
- Dec 15-16 – CAAAC meeting
- Jan 7 – Remainder of comments from CAAAC
- Jan 25 – Deliver report of recommendations to EPA/OAR

# OTC Response

- How do we best express our position on the issues that represent concerns and those that are opportunities for OTC?
- Long-term vision of what changes are needed will affect what types of short-term fixes are appropriate – how to ensure this process is not too myopic?