

PM_{2.5} Redesignation Request and Maintenance Plan

Comments & Responses

Sunil Kumar

MWAQC

May 22, 2013

Public Comment - Process

- MWAQC approved PM2.5 Maintenance Plan for public comment
- States held public comment period in February
- State air agencies must respond to public comments
 - EPA – DC, MD, VA
 - Sierra Club - MD only
 - Dominion Resources – VA only
- MWAQC approves PM2.5 Maintenance Plan with Comments and Responses to Comments

EPA Comments & Responses

- General Comment
 - Court to EPA – Implement 1997 PM_{2.5} standard (15 ug/m³) under subpart 4, part D, Title 1 (Clean Air Act) specific to Particulate Matter
 - Currently PM_{2.5} standard implemented under subpart 1, part D, Title 1 (applies to pollutants other Particulate Matter)
 - EPA studying impacts of this ruling on PM_{2.5} Redesignation Request & Maintenance Plan
- Response
 - Washington region's PM_{2.5} Redesignation Request & Maintenance Plan fully conform to all current EPA guidance and regulatory requirements
 - Washington DC-MD-VA region has complied with the 1997 PM_{2.5} NAAQS since 2005 and current data much below the standard
 - Based on current controls, highly unlikely that the region will violate the standard in future
 - IF EPA finalizes a different approach, plan can be revised accordingly

Sierra Club Comments & Responses

- Comment
 - Plan does not address ammonia and volatile organic compounds (“VOCs”) as PM_{2.5} precursors as required by recent court decision
- Response
 - Washington region's PM_{2.5} Redesignation Request & Maintenance Plan fully conform to all current EPA guidance and regulatory requirements
 - Washington DC-MD-VA region has complied with the 1997 PM_{2.5} NAAQS since 2005 and current data much below the standard
 - Based on current controls, highly unlikely that the region will violate the standard in future
 - SO₂ controls implemented more beneficial than VOC control (already in place)
 - IF EPA finalizes a different approach, plan can be revised accordingly

Sierra Club Comments & Responses

- Comment
 - Plan does not address recent EPA decision to allow sale of gasoline with higher ethanol content in its mobile source inventory
- Response
 - The Maintenance Plan ensures against changes and uncertainties in mobile source emissions by establishing motor vehicle emission budgets for several key years
 - Regardless of changes in fuels, fleets or vehicle miles travelled, mobile source emissions must be equal to or less than these budgets
 - The Maintenance Plan contains a commitment to enact and implement additional contingency measures expeditiously in the event that future violations of the PM_{2.5} standard occur

Dominion Comment & Response

- Comment
 - Proposed approach to 2010 SO₂ standard mentioned in plan is obsolete in view of recent changes by EPA.
- Response
 - Reference in the plan to the proposed approach will be deleted

Next Steps

- MWAQC approves Response To Comments, and approves submitting Plan to EPA Region 3
- States submit PM2.5 Maintenance Plan to EPA Region 3
- EPA has 18 months to approve the Plan
- <http://www.mwcog.org/environment/air/downloads/PM/default.asp>