

MWAQC Technical Advisory Committee

1-Page Summary of Policy-Relevant Issues July 16, 2007

A special meeting of the MWAQC Technical Advisory Committee was held via conference call on July 16, 2007. The focus of the call was to consider issues related to a potential redesignation request for the PM_{2.5} annual standard.

Background

A SIP to meet EPA's PM_{2.5} NAAQS is due to EPA by April 5, 2008. However, monitoring data for 2003-2005 and 2004-2006 show that the PM_{2.5} Annual Design Value is below the 15 µg/m³ NAAQS (1997). As such, the region could submit a redesignation request and a maintenance plan instead of an Attainment SIP.

Options

Options for addressing a potential redesignation request considered by the TAC include:

- Option 1. Continue planning activities to prepare an Attainment SIP due by April 5, 2008
- Option 2. Submit a letter request for an Attainment Determination under EPA's Clean Data Policy. This suspends SIP submittal requirements. The region can then prepare an official Redesignation Request and Maintenance Plan; or could revert back and prepare an Attainment SIP. The April 5, 2008 deadline would not apply.
- Option 3. Submit an official Redesignation Request and Maintenance Plan instead of an Attainment SIP or a letter request for an Attainment Determination.

Issues

There are several key issues being considered related to developing a final recommendation on which option to pursue.

- Maryland and DC have sued EPA over the decision to not lower the annual standard during the 2006 NAAQS revision.
- The Washington region may be designated nonattainment for the new daily standard (2006 NAAQS) in 2009/2010.
- In order to be officially redesignated to attainment of the annual standard, the region must prepare a Maintenance Plan that would involve establishing new interim and outyear inventories and mobile budgets. New outyear mobile budgets will need to account for the fact that PM direct emissions are expected to increase after 2020.
- EPA's Clean Data Policy under the ozone standard is being litigated. The outcome of the litigation could affect use of the Clean Data Policy for PM.

Positions

- The City of Alexandria believes that there are local exceedances of the NAAQS caused by local point sources. The City considers a request for an Attainment Determination inappropriate at this time. The City wants local hotspots to be addressed as part of the Attainment SIP process.
- Virginia DEQ supports the redesignation request (Option 2 or 3). One of the primary reasons is that new NSR regulations and an NSR SIP would not have to be developed. If redesignated to attainment there are potential economic benefits (ability to attract new businesses). Local hotspots should be addressed as part of the facility permitting process.
- Maryland and the District support any option, as long as new control programs are developed and an aggressive Maintenance Plan is developed.

Outcome

- Unless Virginia and the local jurisdictions in Virginia can decide on a recommended course of action, staff will present to MWAQC two options.
 - Option A. Continue planning activities to prepare an Attainment SIP due by April 5, 2008
 - Option B. Submit a letter request for an Attainment Determination under EPA's Clean Data Policy. Make a decision about Attainment SIP or Redesignation Request/Maintenance Plan at a later date.