

# UPDATES ON MATS, PM2.5 NAAQS, AND 2020 ALA REPORT

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# FINAL MATS RULE

- April 16, 2020 - EPA completed a reconsideration of the appropriate and necessary finding for the Mercury and Air Toxics Standards (MATS). This was first proposed on February 7, 2019.
- Based on the revised cost-benefit analysis, EPA concluded that it is not "appropriate and necessary" to regulate electric utility steam generating units (EGUs) under section 112 of the Clean Air Act (This section deals with HAPs).
- However, EPA did not remove coal- and oil-fired EGUs from the list of affected source categories for regulation under section 112 of the CAA, so the MATS rule remains in effect.
- EPA also took final action on the residual risk and technology review (RTR) required by CAA section 112. EPA did not change the MATS.
- EPA's revised analysis did not include co-benefits from particulate matter (PM) while the analysis for the 2012 MATS did.
- EPA determined that equal reliance on the PM benefits projected to occur as an ancillary result of HAP emission reductions was flawed since CAA section 112 is specifically designed to achieve HAP emissions reductions.



# FINAL MATS RULE

- EPA determined that the correct consideration of cost is to primarily compare the cost of compliance with MATS with the benefits that are specifically attributable to reductions in emissions of HAP.
- April 9, 2020 – EPA finalized Mercury & Air Toxics Standards (MATS) for a sub-category of Electric Generating Units (EGUs) using Eastern Bituminous Coal Refuse coming from Pennsylvania and West Virginia effective April 15, 2020
- New emission standards allow higher acid gas HAP and SO<sub>2</sub> emissions from these facilities compared to the emission standards in the original 2012 MATS
- Emissions of other HAP will not change under this action.
- These higher allowable emissions may, however, be partially offset. In the absence of this rule, closure of the affected EGUs would likely result in reduced remediation of abandoned mine lands (AMLs) and potentially increase the risk and impact of emissions from refuse piles. Refuse piles at AMLs are prone to spontaneous smoldering which emits uncontrolled air pollutants including acid gases and other HAP, and with less remediation, the potential for greater emissions from smoldering increases.

# PROPOSED PM2.5 NAAQS

- EPA proposed on April 30, 2020 primary and secondary PM2.5 NAAQS.
- EPA is proposing to retain current 24-hour (35 ug/m3) and annual (12.0 ug/m3) primary standards for PM2.5.
- EPA is also proposing to retain current 24-hour (150 ug/m3) primary and secondary standards for PM10 (There are no annual primary or secondary standards for PM10).
- EPA staff scientists recommended 8.0 to 10.0 ug/m3 for annual PM2.5 NAAQS and up to 30 ug/m3 for daily standard  
(Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter, External Review Draft, EPA, September 2019)
- CASAC split – some recommending tighter standards, some ok with current ones.
- Last date for comments – June 26, 2020.
- Comments to be sent to Docket ID No. EPA-HQ-OAR-2015-0072 by any of the following means:
  - Federal eRulemaking Portal: <https://www.regulations.gov> (Preferred method)
  - Email: [a-and-r-Docket@epa.gov](mailto:a-and-r-Docket@epa.gov). Include the Docket ID No. EPA-HQ-OAR-2015-0072 in the subject line of the message.

# STATE OF THE AIR REPORT

- American Lung Association (ALA) published their 2020 annual State of the Air report in April
- Combines the metropolitan Washington and metropolitan Baltimore areas in its metro area rankings.
- Also provides individual city/county rankings
- Ranks are based on a grading system, which assigns standard weights to the number of code orange, red, and purple days.
- Grades are calculated by adding 3 years of individual level data (2016-2018), multiplying the sums of each level by the assigned standard weights (i.e. 1=orange, 1.5=red, 2.0=purple and 2.5=maroon) and calculating the average.
- Grades are assigned based on the weighted averages as follows:
  - A=0.0, B=0.3-0.9, C=1.0-2.0, D=2.1-3.2, F=3.3+.
- Report does not consider Design Value used by EPA for attainment evaluation



# STATE OF THE AIR REPORT

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- Combined metro Washington-Baltimore CSA ranks -
  - 20<sup>th</sup> for ozone pollution out of 228 metro areas rated (16<sup>th</sup> in 2019 report)
  - 64<sup>th</sup> for 24-hour particle pollution out of 217 metro areas rated (Not on top 25 list in 2019)
  - 49<sup>th</sup> for annual particle pollution out of 203 metro areas rated (Not on top 25 list in 2019)

# STATE OF THE AIR REPORT

| Jurisdiction         | Grade (Ozone) | Grade (24-Hr PM2.5) | Grade (Annual PM2.5) |
|----------------------|---------------|---------------------|----------------------|
| District of Columbia | F - 5.2       | B - 0.7             | P                    |
| Calvert              | C - 1.7       |                     |                      |
| Charles              | D - 2.3       |                     |                      |
| Fredrick             | C - 1.7       |                     |                      |
| Montgomery           | C - 1.0       | A - 0.0             | P                    |
| Prince George's      | F - 7.8       | A - 0.0             | P                    |
| Arlington            | F - 4.0       | B - 0.3             | P                    |
| Fairfax              | D - 2.3       | B - 0.3             | P                    |
| Loudoun              | B - 0.3       | A - 0.0             | P                    |
| Prince William       | C - 1.0       |                     |                      |

