

MEMORANDUM

June 11, 2013

To: MWAQC Technical Advisory Committee

From: Sunil Kumar
Senior Environmental Engineer, COG/DEP

Subject: Options for Attainment of 2008 Ozone NAAQS (0.075 ppm/75 ppb)

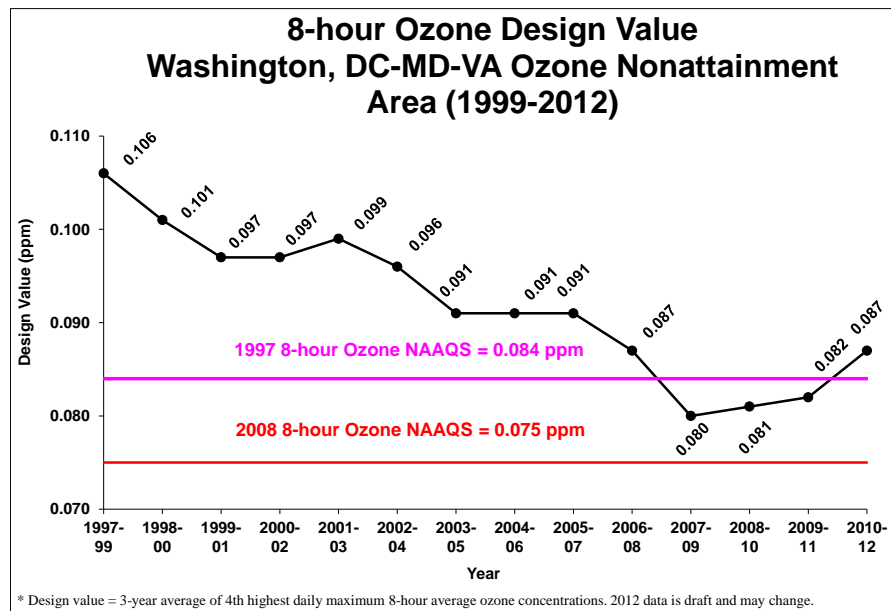
Based on the trend in ozone design values since 2010, it appears that the Washington region may not attain the 2008 ozone standard by 2015. The purpose of this memorandum is to provide various options for discussion.

Ozone Designation for the Washington Region & Attainment Deadline

EPA designated the Washington region as “Marginal” nonattainment area for the 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS). This designation became effective on July 20, 2012 and was based on the certified 2008-2010 regional ozone design value of 0.081 ppm.¹ An area is designated as Marginal nonattainment area if its design value is between 0.076 ppm and 0.085 ppm. The attainment date for the Marginal area is December 31, 2015.

Current Ozone Data & Attainment Status of the Washington Region

In 2012 the Washington region’s design value increased to 0.087 ppm. If EPA were to designate the region based on the 2012 data, the Washington region would be in the “Moderate” nonattainment area category. The range for classifying an area as Moderate is between 0.086 ppm-0.100 ppm. Because the attainment date for a Marginal nonattainment area is December 31, 2015, EPA will determine attainment using the 2015 design value based on the data for the period 2013 through 2015. The certified 2013-2015 data will be available by June 2016.



¹ Design value is a 3-year average of the 4th highest daily maximum 8-hour average ozone concentrations.

Scenarios for Attainment of 2008 Ozone NAAQS & Associated Consequences

A. No action, wait until 2015 to see if the region attains the NAAQS by 2015

If the region does not attain the standard by the attainment date (December 31, 2015), EPA will reclassify the region to the Moderate designation by June 30, 2016 at the latest. Attainment date for the reclassified Moderate area would be December 31, 2018 leaving less than three years to reduce emissions and attain the NAAQS. Reasonable further progress (RFP) and attainment plans will need to be submitted in short timeframes.

If the reclassified moderate area does not attain by December 31, 2018, then EPA would reclassify the region to the Serious designation leading to more stringent requirements.

B. Wait until 2015 to seek extension of attainment date

States can request for up to two 1-year extensions of the attainment dates. If the Washington region fails to attain the 2008 ozone NAAQS by December 31, 2015, it can request its first 1-year extension to extend the attainment date to December 31, 2016 if the region's 4th highest daily maximum 8-hour average ozone concentration is at or below 0.075 ppm. The region can request another 1-year extension to extend the attainment date to December 31, 2017 if the 4th highest daily maximum 8-hour average ozone concentration averaged for the period 2015 through 2016 is at or below 0.075 ppm.

In the event, the region is not able to attain the standard by December 31, 2016 or December 31, 2017 (depending on the number of extensions requested), then EPA will reclassify the region to moderate nonattainment area and the attainment date will be December 31, 2018. This will leave only two years or one year (depending on the number of extensions) to submit state implementation plan, implement controls, and attain the standard.

C. Request voluntary reclassification to Moderate designation

States can request voluntary reclassification from the current Marginal designation to the Moderate designation. A request for voluntary reclassification will extend the attainment date to December 31, 2018 providing additional time to reduce emissions and sufficient time to develop Attainment plans for the 2008 ozone NAAQS. RFP plan would also need to be submitted. If the reclassified moderate area does not attain by December 31, 2018, then EPA would reclassify the region to the Serious designation leading to more stringent requirements.

D. Voluntary effort to advance planning for ozone attainment

States can undertake emissions control strategies and planning in anticipation of the reclassification to a higher level without actually requesting a formal voluntary reclassification. Development of a Reasonable Further Progress (RFP) plan involving 15% VOC or NO_x emission reduction between the base year 2011 and the future year 2017 could be part of such a strategy. The RFP plan also has the potential to advance the attainment date for the Moderate nonattainment area. The states in the Metropolitan Washington region agreed to this strategy and it is included in the FY 2014 MWAQC Work Program and Budget.