

7.0 REASONABLY AVAILABLE CONTROL MEASURE (RACM) ANALYSIS

Section 172(c)(1) of the Clean Air Act requires state implementation plans (SIPs) to include an analysis of reasonably available control measures (RACM). This analysis is designed to ensure that the Washington region is implementing all RACM in order to demonstrate attainment with the annual PM_{2.5} standard on the earliest date possible.

7.1 RACM Criteria

The RACM requirement is rooted in Section 172(c)(1) of the Clean Air Act, which directs states to “provide for implementation of all reasonably available control measures as expeditiously as practicable”. In its 1992 General Preamble for implementation of the 1990 Clean Air Act Amendments (57 FR 13498) EPA explains that it interprets Section 172(c)(1) as a requirement that states incorporate in a SIP all RACM that would advance a region’s attainment date. However, regions are obligated to adopt only those measures that are reasonably available for implementation in light of local circumstances.

7.1.1 Advance the Attainment Date

EPA has traditionally instructed regions to evaluate RACM measures on their ability to advance the region’s attainment date. This means that implementation of a measure or a group of measures must enable the region to reduce annual PM_{2.5} levels to the 15 ug/m³ required to attain the PM_{2.5} annual standard at least one year earlier than expected. As discussed in Chapter 1, the PM_{2.5} annual Design Value for 2003-2005 is 14.8 ug/m³.¹ The Washington region therefore has already reduced PM_{2.5} levels to below the 15 ug/m³ standard thereby attaining the standard. As such, there are no additional measures that could be adopted to advance the attainment date.

7.1.2 Adoption of Reasonable Measures

All of the adopted measures that enabled the region to attain the standard in 2005 are included in this SIP. The time required to develop new regulatory programs in the states of Maryland and Virginia, and the District of Columbia, is greater than one year. As such, there are no additional measures that can be adopted by January 1, 2008.

7.2 Summary of RACM Determination

The states of Maryland and Virginia, and the District of Columbia have determined that there are no additional Reasonably Available Control Measures beyond the measures already adopted and included in this SIP. This determination is based on consideration of two primary RACM criteria established by EPA. First, RACM must advance the attainment by one year, and second, states are required only to adopt those measures that are considered reasonable, taking into account feasible implementation dates. This analysis establishes that the region attained the standard by 2005 and that there are no additional measures that could be adopted to advance the attainment date.

¹ The draft Design Value for 2004-2006 is 14.5 ug/m³.