



Item #3

# Ozone Nonattainment Area Designations: State Proposals

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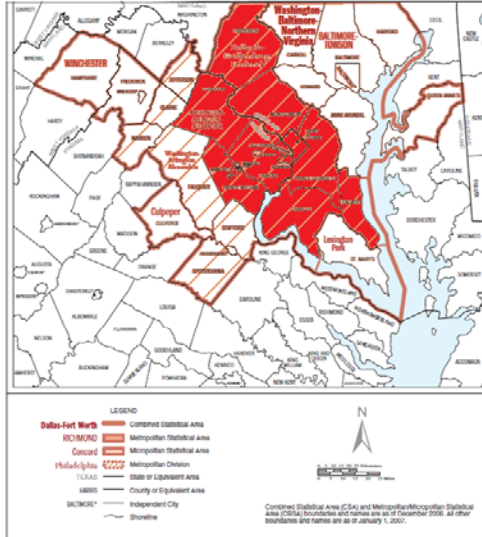
## Introduction

- Current Ozone standard (75 parts per billion) published
  - 2008
- Nonattainment area designation for the current standard
  - May 2012
- Steps: Nonattainment area designation process
  - Initial recommendation from states (March 2009)
  - Updated recommendation from states (Dec 2011)
  - EPA's preliminary recommendation (Dec 2011)
  - State response to EPA's recommendation in 120 days (March 2012)
  - EPA finalizes area designation (due likely May 2012)

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## State Proposal - VA

- Keep the current nonattainment area (84 ppb std)



Washington-Baltimore-  
N. Virginia,  
DC-MD-VA-WV CSA

Washington, DC-MD-VA  
Ozone Nonattainment  
Area (84 ppb standard)

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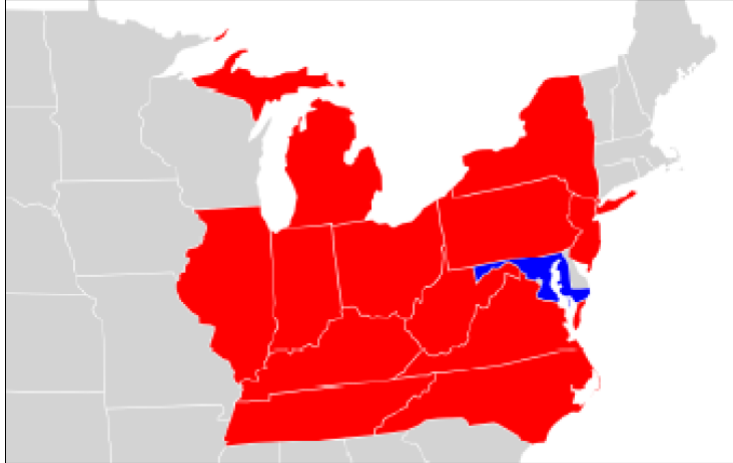
## State Proposal - VA

- Reasons to retain the current Ozone NAA (84 ppb standard)
  - Except Northern Virginia, rest all counties/cities in Virginia show attainment of the 75 ppb standard (based on 2009-11 ozone data)
  - Therefore, only N. Virginia counties/cities recommended to be included in the Ozone NAA (75 ppb standard)

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## State Proposal - MD

- Preferred Option – Mega nonattainment area (16 states & DC) to address ozone transport from outside the region

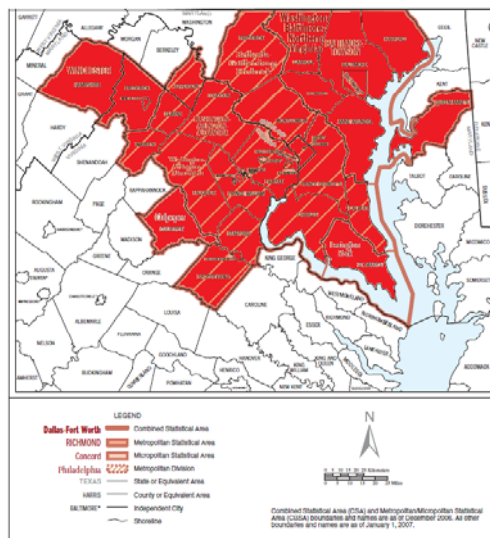


Source: MDE letter to EPA (March 7, 2012) on ozone NAA designation issue (75 ppb standard)

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## State Proposal - MD

- Second Option – Extend current nonattainment area to entire CSA



Washington-Baltimore-  
N. Virginia,  
DC-MD-VA-WV CSA

Proposed Washington,  
DC-MD-VA-WV Ozone  
Nonattainment Area  
(75 ppb standard)

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U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration U.S. Census Bureau

## State Proposal - MD

### Reasons to extend the current Ozone NAA (84 ppb standard)

- EPA criteria for designating a county/city as “nonattainment”
  - Ozone data for a county/city shows nonattainment
  - A county/city contributes to ozone levels in another county/city
- Maryland used the above two criteria to recommend a larger “nonattainment” area
  - Ozone data in DC and a number of counties/cities in MD and VA show nonattainment for the 75 ppb standard
  - Transport of ozone & its precursors (NOx & VOC) from a number of upwind counties/cities located in DC, MD, VA, and other states, contribute to ozone nonattainment in Maryland areas.
  - Currently data for many of these counties/cities show attainment or marginal nonattainment for the 75 ppb standard. If EPA officially designates these counties/cities as attainment or marginal nonattainment, they will not need have to implement any ozone control measures.
  - This will adversely impact the ability of Maryland areas in general, and Edgewood monitor in particular, to attain the 75 ppb standard. 7

## State Proposal - MD

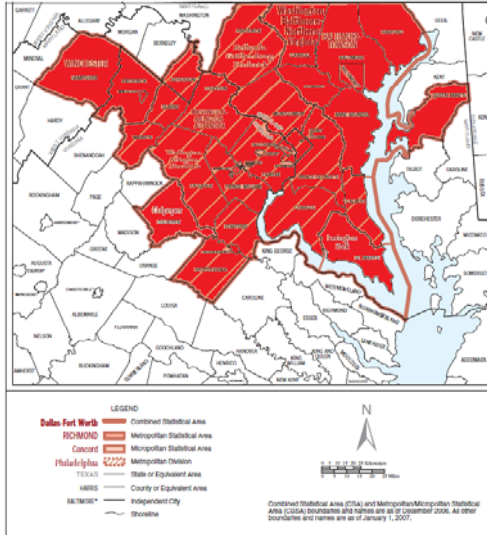
### Reasons to extend the current Ozone NAA (84 ppb standard)

- Ozone control measures in all upwind states contributing to MD ozone levels must be implemented using a national rule (e.g, CSAPR) in order for MD monitors (including Edgewood) to attain the 75 ppb standard
- Transport SIPs are not addressing transport effectively (§110 A2 (d))
- EPA's rule to reduce interstate transport (CSAPR) is being litigated
- A large nonattainment area can work through coordination
  - Philadelphia-Wilmington-Trenton ozone nonattainment area (4 states, 2 EPA regions, and at least 2 MPOs)
  - Uses sub-regional coordination processes for both air quality planning and transportation conformity
  - Sub-regional mobile source emission budgets

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## State Proposal - DC

- Prefers a large multi-jurisdictional nonattainment area, but at a minimum an area covering entire CSA



Washington-Baltimore-  
N. Virginia,  
DC-MD-VA-WV CSA

Proposed Washington,  
DC-MD-VA-WV Ozone  
Nonattainment Area  
(75 ppb standard)

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## State Proposal - DC

### Reasons to extend the current Ozone NAA (84 ppb standard)

- Follows rationale similar to Maryland on ozone transport issue from outside region
- Transport of ozone and its precursors from a number of states contribute significantly to ozone problems in DC
- Onroad mobile sector is a major contributor to emissions in Washington and Baltimore metropolitan areas. Control of onroad emissions from counties/cities in DC-MD-VA-WV CSA can help in lowering ozone levels in DC.

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## Conclusions

- States have different views on the boundary of the new ozone nonattainment area
  - VA: Retain the current nonattainment area
  - DC & MD: Prefer a large multi-jurisdictional nonattainment area, but want at a minimum the nonattainment area to cover the entire DC-MD-VA-WV CSA
- Extending current Ozone nonattainment area to the entire CSA will require larger coordination effort
  - A new coordination effort with WV will be required
  - Extra planning and coordination efforts for additional MD and VA counties and cities will be required
  - Transportation conformity process would need to be worked out
  - A process followed by Philadelphia-Wilmington-Trenton ozone nonattainment area can serve as a model
- States and EPA are discussing designation issue
- Final EPA designation by May 2012

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