

NAAQS Review Cycle & SIPs

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NAAQS Review Cycle

- Process of Reviewing the National Ambient Air Quality Standards <https://www.epa.gov/criteria-air-pollutants/process-reviewing-national-ambient-air-quality-standards>
- Sections 108 and 109 of the Clean Air Act (CAA) govern the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS) for each criteria air pollutant to provide protection for the nation's public health and the environment.
 - 109(d)(1): NAAQS to be reviewed in five-year intervals and revise if appropriate
 - Can be done earlier or more frequently

Process for Implementing NAAQS

- Nonattainment areas are designated
 - States recommend, EPA finalizes
- States prepare SIPs for EPA approval
 - Infrastructure and transport SIPs for all states
 - Attainment SIPs for moderate and above NAAs
 - EPA must issue FIP if state fails to meet obligations
- Regulations are implemented and enforced to reduce emissions
- Monitoring data are reviewed to determine result (generally at least 3 years of data)

Inherent Tensions with NAAQS Review Cycle

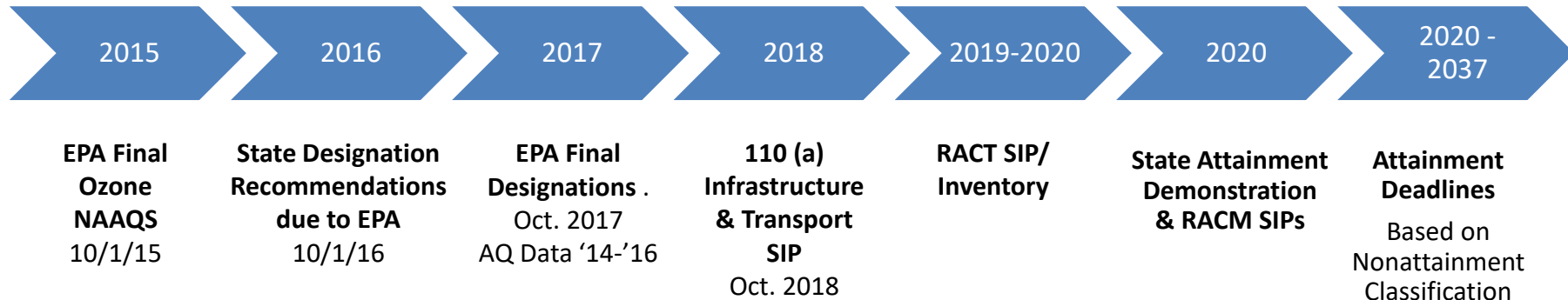
- EPA has rarely been able to meet the 5-year NAAQS review deadline
 - Often, EPA acts after environmental groups sue and court establishes deadlines
- SIP revisions triggered by NAAQS review cycles
 - Legal challenges can disrupt cycle
 - Delays in EPA guidance cause uncertainty

Approximate SIP Timeline of Regulatory Requirements

State Recommendations	Years After Promulgation...	1
Federal Designations		2
110(a) infrastructure & transport SIPs		3
RACT SIPs	Years After Designation...	2-3
Attainment Demonstration & RACM SIPs (All Nonattainment Areas)		3

Learn more about the 2015 70 ppb Ozone NAAQS at:

<http://www.epa.gov/ozone-pollution/2015-national-ambient-air-quality-standards-naaqs-ozone>



Ozone NAAQS History (1)

- 1997: Ozone NAAQS adopted at 0.08 ppm
- 2008: EPA tightened ozone standard to 0.075 ppm
 - Final NAAQS was not as strict as EPA Clean Air Science Advisory Committee's recommendation
 - Lawsuits filed, EPA agreed to reconsider
 - In the meantime, NAAQS remained at 0.08 ppm, and 2008 standard implementation was delayed

Ozone NAAQS History (2)

- 2011: President Obama chose to retain the 0.075 ppm standard adopted in 2008
 - EPA finalized the 2008 0.075 ppm standard and designated nonattainment areas in 2012 (very late!)
 - SIPs were due in 2011 (ISIP) 2014 (RACT) 2015-16-17 (Attainment)
- 2015: EPA tightened the NAAQS to 0.070 ppm
 - Lawsuits filed
 - Nonattainment designations due October 1, 2017
 - States still working on 2008 NAAQS SIPs

SIP Planning and the NAAQS Review Cycle

- History shows the difficulty in coordinating the NAAQS and SIP cycles for an individual pollutant
 - NAAQS revisions for Ozone
 - 1971, 1979, 1993 (no change), 1997, 2008, 2015
 - Designations and/or NAAQS can be delayed by lawsuits
 - SIP guidance has generally taken a long time to be issued
- Even more difficult to coordinate the cycles among different NAAQS
 - Last PM_{2.5} primary in 2012; Primary NO₂ and SO₂ in 2010, Ozone in 2015
 - Multi-pollutant planning/SIPs ????

Any questions or comments?