



Overview

- **SO₂ NAAQS Data Requirements Proposed Rule**
 - Signed on April 17, 2014; pending FR publication
 - 60 day public comment period (docket EPA-HQ-OAR-2013-0711)
 - Final rule expected in late 2014 – early 2015
- **Elements of the draft SO₂ data requirements rule proposal**
 - Priority areas - Source threshold options
 - Addressing priority areas: Options for modeling or monitoring
 - Expected implementation timeline / deadlines for state submittals
 - Incentives for enforceable emission limits to avoid nonattainment designation
 - Ongoing assessment of air quality for areas designated “attainment”



Expected Implementation Timeline: SO₂ Data Requirements Rule

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

- **Late 2014 - Early 2015:** EPA issues final rule
- **Jan. 2016:** Air agency: (1) identifies sources to be characterized with monitoring data; and (2) provides modeling protocol for other sources
- **July 2016:** Air agency updates annual air quality monitoring plan
- **Jan. 2017:**
 - New monitoring sites operational in January 2017
 - Air agency submits modeling analyses for “modeling” areas (i.e., areas above threshold for which they are not installing new monitors)
 - Air agency can submit boundary recommendations for all areas except those relying on new monitoring data (in future)
- **Dec. 2017:** EPA intends to designate areas not installing new monitors
 - Designations based on: modeling data, properly sited monitors showing attainment, areas having no sources
- **Early 2020:** New monitoring sites have 3 years of data; air agency submits monitoring data
 - Air agency can submit boundary recommendations for monitored areas
- **Dec. 2020:** EPA intends to designate areas for rest of country



Source Threshold Options (2)

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

Option	Threshold For SO ₂ Sources		Number of Sources**	Percent of National Emission†	Plus Sources In Designated Nonattainment Areas‡	Total Source Coverage	Total Annual Emissions Coverage
	Inside CBSAs Greater than 1M	Outside CBSAs Greater than 1M					
1*	1,000 TPY	2,000 TPY	443	75 %	53	496	90 %
2	2,000 TPY	5,000 TPY	270	66 %	53	323	82 %
3	3,000 TPY	10,000 TPY	158	54 %	53	211	69 %

* Preferred option.
 ** These do not include sources located in nonattainment areas designated in 2013.
 † Total SO₂ emissions in 2011 were 5.8 million tons.
 ‡ There are 53 sources with annual emissions greater than 1,000 tpy in nonattainment areas designated in 2013.

- EPA preference is Option 1
 - “90% emissions” option discussed in May 2012 white paper and stakeholder meetings
 - Minimum monitoring requirement for source-oriented lead NAAQS addresses 90% of the stationary source emissions
 - Many states supported a threshold of 2,000 tpy
 - 2013 designations generally reflect sources above these thresholds
 - No state would have more than 32 sources
 - Close to 10% of the target sources were included in 2013 area designations



Incentives for Enforceable Emission Limits to Avoid Nonattainment Designation

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

- Air agencies can avoid nonattainment designation for certain areas by working with sources to establish permanent and enforceable emission limitations that show attainment with the SO₂ NAAQS through modeling prior to round of designations in 2017
 - Emission limits would need to be incorporated into the SIP (e.g. through source-specific SIP revision, minor NSR permit, consent decree, etc.)
 - Can take into consideration emission reduction measures that will be implemented for Mercury and Air Toxics Standard (MATS) and other rules, provided reductions are enforceable



Ongoing Assessment of Air Quality for Areas Designated “Attainment”

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

- If areas are designated “attainment” after states provide monitoring or modeling data, states will be required to verify ongoing attainment
- Monitors deployed to meet the requirements of this rule in general must continue operation. However, the rule proposes that a monitor may be shut down if it meets certain criteria, including:
 - Two proposed options:
 1. if design value is below 50% of standard;
 2. if design value is below 80% of standard.
- Modeled areas
 - For other pollutants, monitors are available to track emissions in the future, but this will not be true for SO₂ where state chooses modeling option
 - Three options are proposed for ongoing assessment of attainment
 1. State assesses emissions annually, conducts modeling every 3 years
 2. State assesses emissions annually; if total SO₂ emissions increase, state recommends whether more modeling is needed; RA considers case-by-case
 3. State conducts screening modeling every 3 years



Questions?

For more information:

SO2 NAAQS Implementation website:

<http://www.epa.gov/airquality/sulfurdioxide/implement.html>

Submit comments:

<http://www.regulations.gov>, docket EPA-HQ-OAR-2013-0711

Rich Damberg

damberg.rich@epa.gov

919-541-5592

John Summerhays

summerhays.john@epa.gov

312-886-6067