

Information for Stakeholder Meetings on Implementation of the SO₂ NAAQS

May 30 – June 1, 2012

Purpose

- EPA is convening focused meetings with environmental groups, states, tribes, and other interested stakeholders to get ideas on refining the approach for establishing whether areas in the United States and its territories are meeting the 1-hour SO₂ national ambient air quality standard.

Topics That Will Be Discussed

- EPA is asking stakeholders to provide thoughts on monitoring, modeling, and certain implementation issues, particularly for areas that will be designated “unclassifiable
- To focus discussion and promote progress toward a workable approach for implementing the SO₂ standard, EPA developed a white paper that identifies important questions about how we could determine whether an area is meeting the SO₂ standard and how we might use monitoring, modeling, or a combination of monitoring and modeling.
- Specific key questions presented in the EPA white paper are attached. Please review these questions as you prepare for this meeting. The meeting facilitators will focus the meeting on addressing these key questions.

Topics That Will Be Addressed Through Other Processes

- For these stakeholder discussions, EPA is not seeking input on other important SO₂ issues, such as the upcoming area designations process or the SIP requirements for areas that get designated “nonattainment”. EPA will address these two issues in particular through other, separate processes. The meeting facilitators will remind participants, as needed, that these topics are outside the scope of discussion for these meetings.

Other Opportunities to Comment

- Interested parties will also have the opportunity to provide EPA with written comments on the white paper through Friday, June 22, 2012. This option is available to everyone.

What to Expect Following the Stakeholder Meetings

- Following the stakeholder discussions, EPA will prepare and post summaries of key comments from those discussions.
- As an outcome of the stakeholder engagement process, EPA expects to issue guidance or a rulemaking to describe the approach for showing compliance with the standard.

For More Information

- To download the white paper or to obtain more information, including how to comment on the white paper, go to: <http://www.epa.gov/air/sulfurdioxide/implement.html>

ATTACHMENT

Key Questions Presented in EPA's White Paper "Implementation of the 2010 Primary 1-Hour SO₂ NAAQS"

I. Monitoring Options: Key Questions

In order for EPA to determine the feasibility of using monitors principally to determine attainment or nonattainment of the standard, stakeholder input is needed on the following key questions:

- a. Are the conceptual monitoring networks described in the white paper sufficient to determine whether ambient SO₂ levels meet the NAAQS and are protective of public health without the need for additional modeling? If not, then what enhancements should be made to them? In what situations should meteorological data collection also be required?
- b. What is an appropriate number of monitors to site around a source to assess air quality?
- c. Is it reasonable for states to consider relocating monitors within their states? What are potential barriers to relocation (e.g., cost, agreement with local community)? Is it reasonable for states to consider transferring their monitors to other states?
- d. What kind of modeling (or other analyses) would be necessary to identify the location of maximum impact? What information and resources are necessary to complete such modeling? What is a reasonable schedule for completing this modeling?
- e. What options exist for paying for the expanded SO₂ monitoring network? Would stakeholders be willing to conduct monitoring at new locations or provide funding to assist states in conducting such monitoring? If so, what type of agreement would be needed between states and stakeholders to ensure the monitoring would be done?
- f. For potential stakeholder operated monitors, what kind of oversight would the states need to perform? Would EPA perform additional oversight? Would someone audit these facility monitoring programs and associated monitors? What type of agreement would be needed between the states and stakeholders to insure the monitoring was carried out? How can we best ensure that these data are made public (e.g., require submittal to AQS)?

II. Modeling Options: Key Questions

In order for EPA to evaluate the feasibility of using modeling in conjunction with monitoring to determine either attainment or nonattainment of the standard, stakeholder input is needed on the following key questions:

- a. Should some criteria (e.g., the population weighted emissions index (PWEI) concept) be used to identify priority sources to be modeled in an area where there is no nearby monitor?
- b. How should the modeling be performed – i.e., what changes to the March 24, 2011 guidance should be made, such as the use of size cut-offs and use of actual emissions?
- c. Are there situations where modeling is preferable to monitoring? If so, then what are these situations? Should EPA require modeling in certain situations, or is monitoring alone always a sufficient option for areas of concern?
- d. Are there situations where monitoring is preferable to modeling? If so, then what are these situations? Should EPA require monitoring in certain situations, or is modeling alone always a sufficient option for areas of concern?
- e. What options exist for paying for the new modeling analyses? Would stakeholders be willing to conduct, or provide funding to assist states in conducting, any new modeling? If so, what type of agreement would be needed between states and stakeholders to insure modeling would be done?

III. Implementation Options: Key Questions

- a. In what form should EPA set forth the revised approach? Would rules need to be revised? Which ones? How should states adopt the new approach, and how much time is needed for this?
- b. What is a reasonable schedule for 1) designing a sufficient monitoring network; and 2) deploying a new monitor or moving a monitor from an existing location? (What can be done to initiate monitoring as quickly as possible to collect sufficient data to make attainment/nonattainment determinations?) Is a phased approach useful?
- c. By what date should the modeling be completed and submitted to EPA? Is a phased approach useful?
- d. Once the modeling/monitoring data are in, how should states and EPA use these data to address violations in unclassifiable areas? Is redesignating the most workable approach? What should be the timing for these redesignations? Is the timing of the next SO₂ NAAQS revision a consideration?
- e. Alternatively, should EPA consider approaches to identify and address violations in unclassifiable areas that do not involve redesignating these areas as “nonattainment”? Which alternative approaches are most promising?
- f. Is it possible to develop an attainment determination approach that provides reasonable assurance that sources of concern that are causing violations will be identified and addressed?
- g. How should EPA address unclassifiable areas with no emissions or shown to have no monitored or modeled violations? What requirements, if any, are appropriate to support designating these areas as attainment? Is this necessary?