AGENDA: 14



BAY AREA Air Quality

MANAGEMENT

DISTRICT

### PM<sub>2.5</sub> National Ambient Air Quality Standards and Initial Area Designations

Board of Directors Meeting February 7, 2024

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# **Presentation Outcome**



To provide an informational update on Environmental Protection Agency's revision to the PM NAAQS and the process EPA uses to designate areas as attaining or not attaining the revised NAAQS.

# **Presentation Outline**



- National Ambient Air Quality Standards (NAAQS)
- Designations process including exceptional events
- Preliminary 2021 2023 data
- Next Steps





No action required.

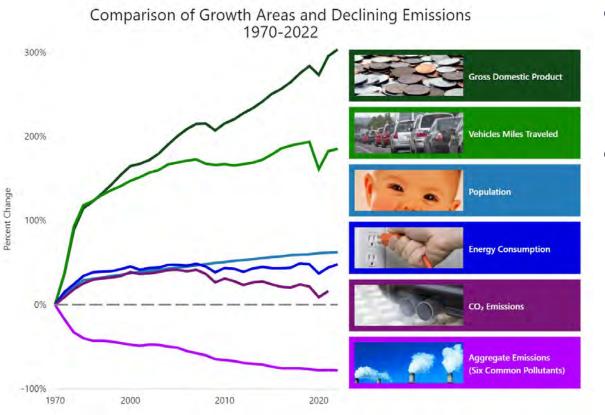
#### National Ambient Air Quality Standards (NAAQS)



- U.S. Environmental Protection Agency (EPA) sets limits for concentrations of six pollutants in ambient (outdoor) air according to the Federal Clean Air Act
  - Carbon monoxide, ozone, lead, oxides of nitrogen, particulate matter (PM), and oxides of sulfur
  - Primary NAAQS: Health-based, to an adequate margin of safety
  - Secondary NAAQS: Welfare-based, e.g. visibility, damage to crops, vegetation, buildings, and animals
- EPA is required to review NAAQS every five years

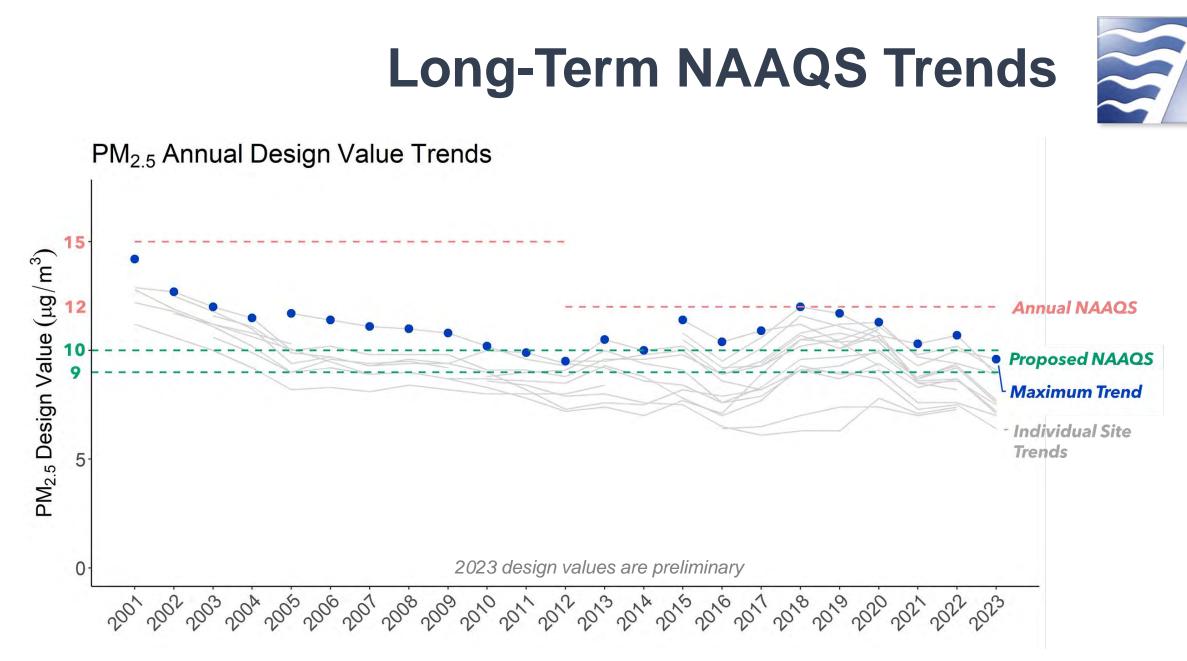
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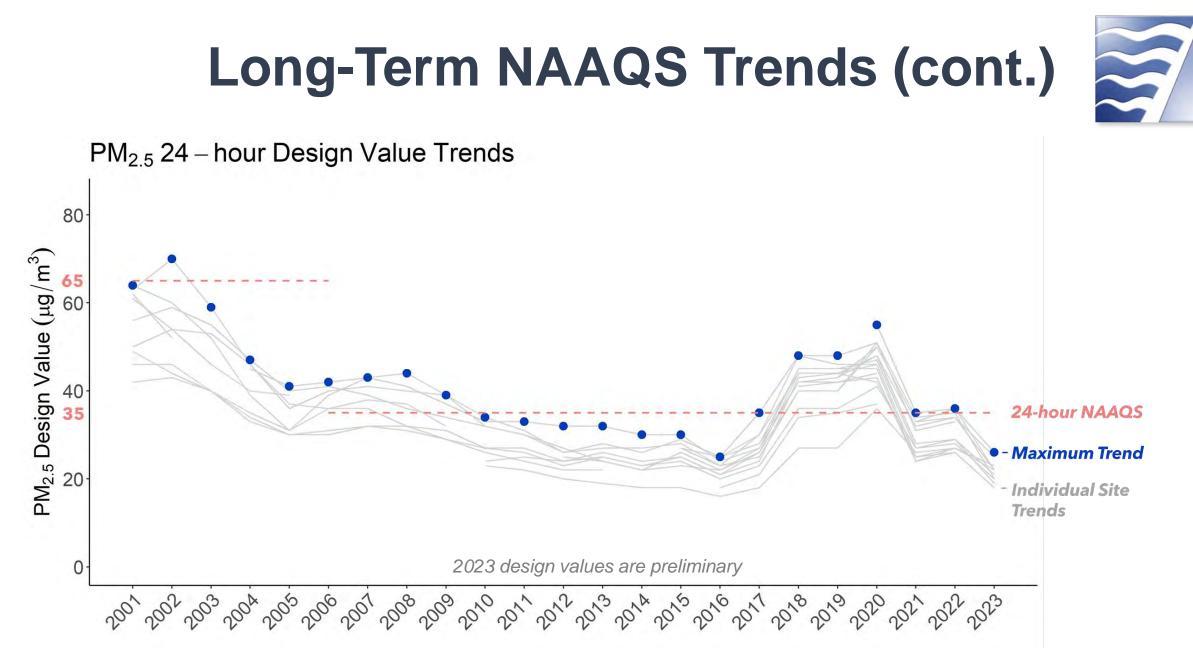




source: EPA, Our Nation's Air, 2022

- Implementing the NAAQS has been a significant driver of emission reductions nationwide
- Implementation includes:
  - NAAQS revision
  - Nonattainment designations
  - State Implementation Plans
  - Emission reductions
  - Monitor to show attainment





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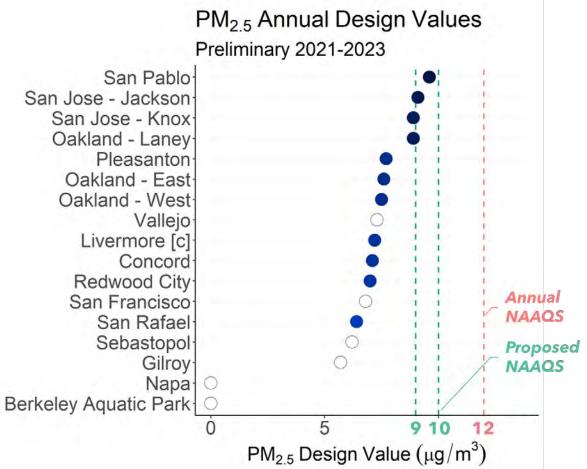


### Proposed 2024 PM NAAQS (Primary)

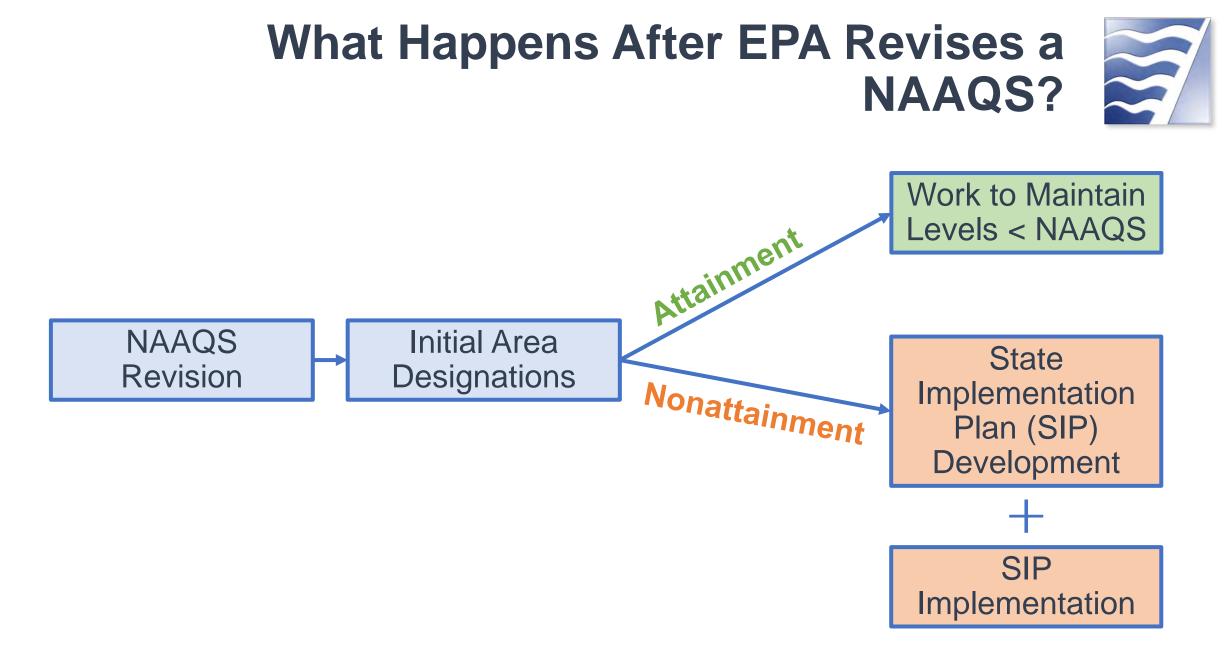
Indicator	Averagin g Time	Previous Level	Existing Bay Area Status	EPA Proposal
PM <sub>2.5</sub>	Annual	12.0 µg/m³	Unclassifiable / Attainment	9.0 – 10.0 µg/m³
PM <sub>2.5</sub>	24-Hours	35 µg/m³	Nonattainment	No change / Retain
PM <sub>10</sub>	24-Hours	150 µg/m³	Unclassifiable/ Attainment	No change / Retain

# Preliminary 2023 PM<sub>2.5</sub> Data





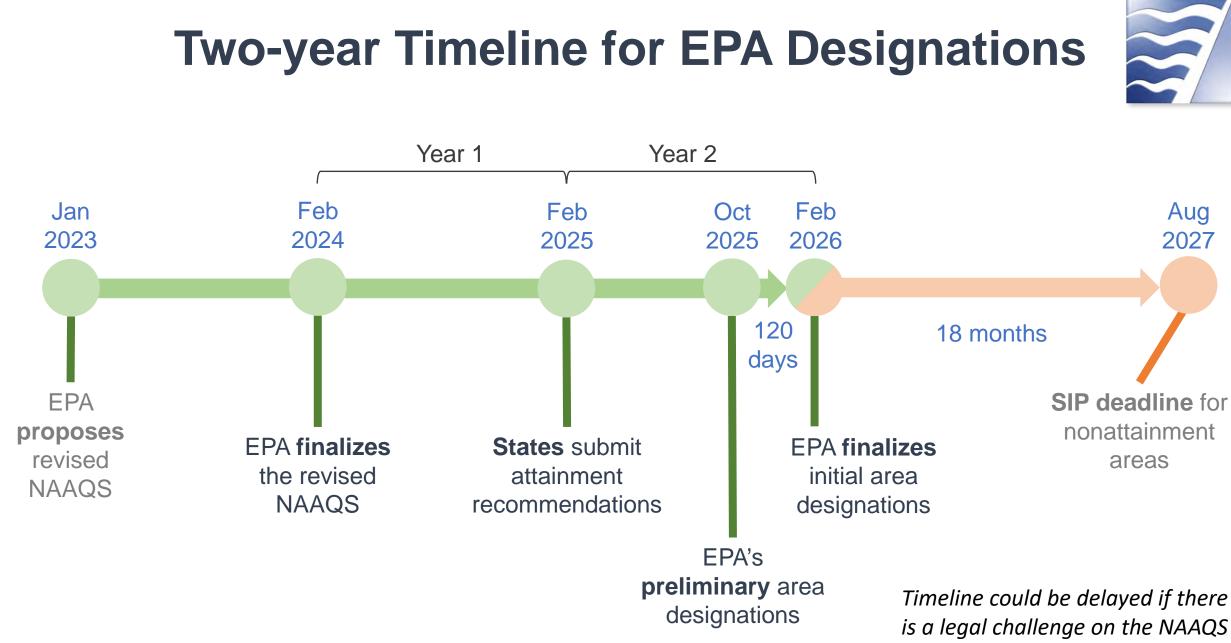
- Preliminary review shows area design value is 9.6 µg/m<sup>3</sup>
- Designations will also include 2024 and possibly 2025 data
- Final attainment status is uncertain until late 2024
- Other factors to consider:
  - 2023 had historically low PM levels due to a very stormy winter
  - Currently assessing magnitude of wildfire smoke impact on 2021-2023



## **NAAQS: Initial Area Designations**

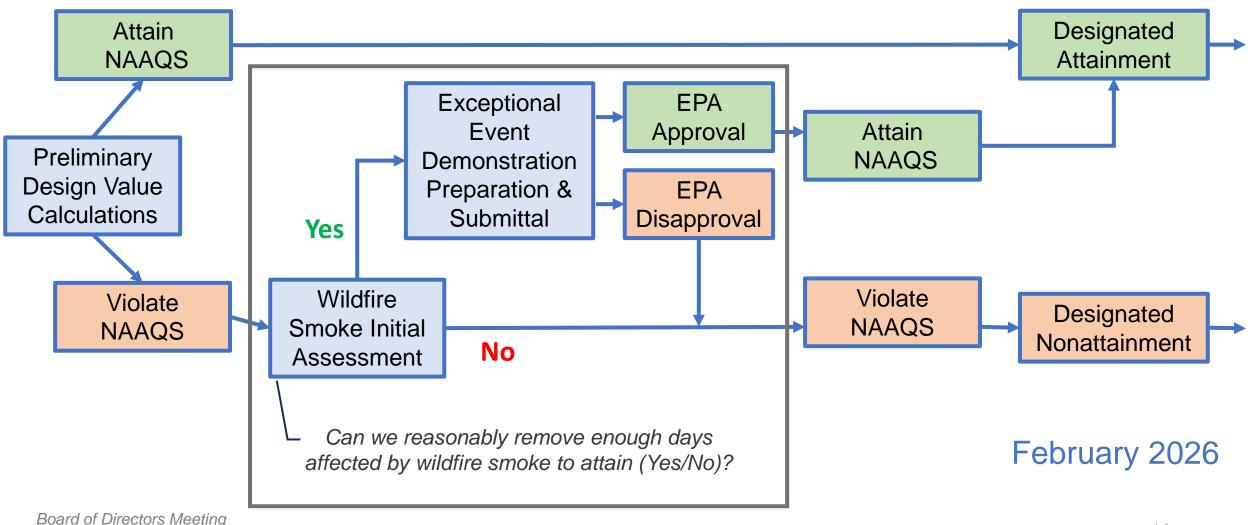


- EPA determines which areas are attaining or not attaining the NAAQS within two years of a final revised (or new) NAAQS
- States submit recommendations to EPA on attainment status
- EPA considers the state recommendation as well as five factors in their technical analysis: air quality, emissions, meteorology, geography & topography, and jurisdictional boundaries
- The air quality factor is based on long-term ambient air quality monitoring performed by State, Local, and Tribal agencies





## **Designations Scenarios**



## **Exceptional Events**



- Long-standing EPA policy based on the Clean Air Act defining the use of monitoring data affected by emissions that are outside the control of State, Local, and Tribal agencies
- Does not allow agencies to get out of controlling local sources of air pollution or from activities to protect public health during high pollution episodes
- Agencies may request that EPA set aside certain days affected by exceptional events when calculating design values
- EPA only uses design values without exceptional event data for specific regulatory actions





#### Wildfire Smoke Impacts and Annual PM<sub>2.5</sub> Designations

Will air quality impacts from wildfire smoke affect our designation?

- Days where wildfire smoke causes a NAAQS violation are eligible exceptional events
- Removing wildfire smoke days may only change a site's annual design value by approximately 0.5 µg/m<sup>3</sup>, and could require demonstrations for over 50 days from 2021 – 2023
- Wildfires in 2024 and 2025 may also affect final designation

# Scenario 1: Designated Attainment





Assess drivers of PM and exposure patterns

Process is under District discretion, can set criteria for plan and reduction measures Plan for regulatory PM<sub>2.5</sub> and precursor emission reductions, operations changes through permitting and enforcement

Plan for PM<sub>2.5</sub> and precursor emissions reductions through incentives

Continue to expand programs reducing PM exposure (e.g., home filtration and Clean Air Centers)

Continue to track progress in air quality with monitoring data

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# Scenario 2: Designated Nonattainment



Designated Nonattainment (~Feb 2026)

Assess drivers of PM and exposure patterns

Process is under EPA authority and oversight. The creditable reduction measures and plan must meet EPA criteria Plan for regulatory PM<sub>2.5</sub> and precursor emission reductions (deferring some measures as contingencies), operations changes through permitting and enforcement

Plan for PM<sub>2.5</sub> and precursor emissions reductions through incentives

Continue to expand programs reducing PM exposure (e.g., home filtration and Clean Air Centers)

Continue to track progress in air quality with monitoring data

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- Review the final NAAQS and forthcoming designations guidance
- Prepare data and exceptional events for CARB recommendation
- Upcoming conversations include
  - Update on exceptional events and expected CARB recommendation
  - Share updated technical information about the drivers of PM<sub>2.5</sub> levels and our path to meeting air quality goals



### **Feedback Requested/Questions**

• Questions and Comments