NAAQS, SIPs, and FIPs

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National Ambient Air Quality Standards (NAAQS)

> EPA sets Primary and Secondary standards for 6 Criteria Pollutants

- > Evaluated by EPA every 5 years
 - Retain
 - Revise
 - Set new standard



NAAQS Continued

Designation Process

- > Typically begins with a new or revised standard
- > States must submit designation recommendations to EPA within 1 year
- > EPA must designate within 2 years
 - > Attainment
 - Unclassifiable
 - Nonattainment



NAAQS Continued

Implementation Process

- > States submit I-SIP within 3 years after new or revised NAAQS
- > Nonattainment SIPs due 18-24 months after nonattainment designation
 - Includes strategies and control measures to improve air quality
 - > Requires adoption of certain specified control requirements
- > If state fails to submit an approvable plan, EPA will develop a FIP



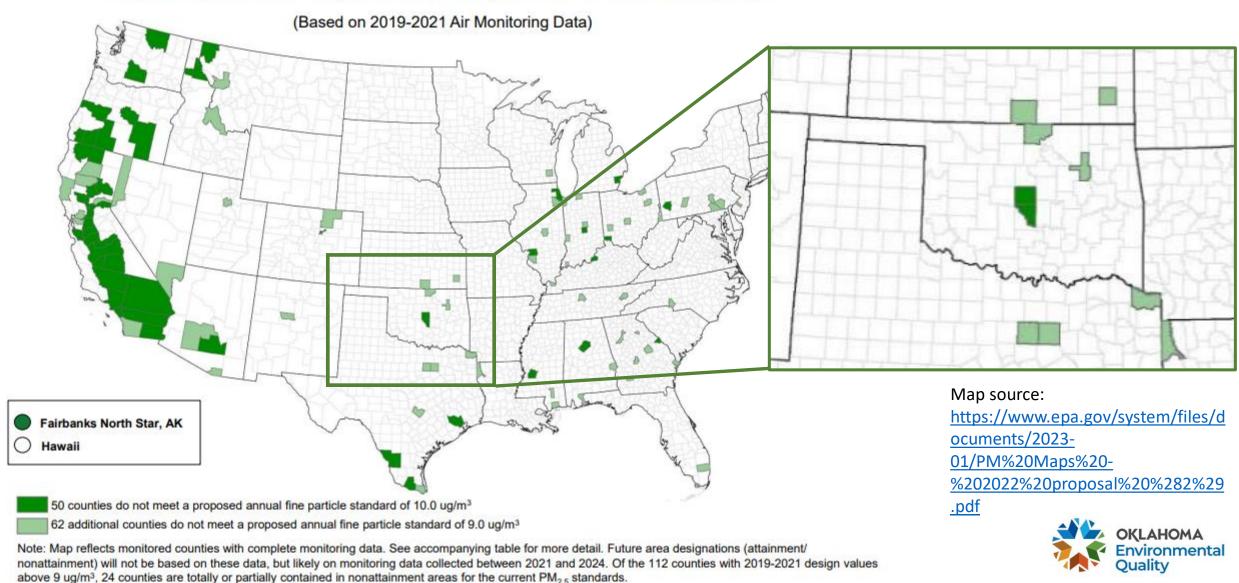
Particulate Matter (PM) NAAQS

- > 2020 Decision to retain 2012 PM NAAQS
- Reconsideration Process begun in 2021
- > Proposed revision to PM NAAQS January 6, 2023
 - > $PM_{2.5}$ Annual Standard from 12.0 μ g/m³ to range of 9.0 10.0 μ g/m³
 - Retain all other standards
- > Final expected Fall 2023





Current Air Monitoring Data Show Some Counties Would Not Meet Proposed Primary Fine Particle Standards



This information is provided for illustrative purposes only and is not intended to project or predict the outcome of any forthcoming designations process.

$PM_{2.5}$ Annual Highs Chart (μ g/m³)

County	Location	2020	2021	2022	Annual
		Mean	Mean	Mean	Design Value
Carter	Healdton	9.2	9.0	7.7	8.7
Cleveland	Moore	9.9	11.1	9.9	10.3
Comanche	Lawton	7.4	8.6	8.1	8.0
Dewey	Seiling	7.3	7.9	7.8	7.7
Кау	Ponca City	9.4	11.7	8.6	9.9
Oklahoma	OKC @ Downtown	7.2	8.4	7.4	7.7
Oklahoma	OKC @ Will Rogers Park	9.6	11.2	9.4	10.1
Oklahoma	OKC @ Oklahoma Christian Univ.	9.9	10.7	9.5	10.0
Pittsburg	McAlester	8.2	9.7	8.8	8.9
Tulsa	Glenpool	8.9	10.1	8.5	9.2
Tulsa	Tulsa @ 36th & Peoria	8.1	9.9	9.0	9.0



$PM_{2.5}$ Annual Highs Chart (µg/m³)

County	Location	2020	2021	2022	2023*	'21-'23*
		Mean	Mean	Mean	Mean	Prelim Avg
Carter	Healdton	9.2	9.0	7.7	9.0	8.6
Cleveland	Moore	9.9	11.1	9.9	10.9	10.6
Comanche	Lawton	7.4	8.6	8.1	8.4	8.4
Dewey	Seiling	7.3	7.9	7.8	8.4	8.0
Кау	Ponca City	9.4	11.7	8.6	9.8	10.0
Oklahoma	OKC @ Downtown	7.2	8.4	7.4	8.3	8.0
Oklahoma	OKC @ Will Rogers Park	9.6	11.2	9.4	10.3	10.3
Oklahoma	OKC @ Oklahoma Christian Univ.	9.9	10.7	9.5	9.6	9.9
Pittsburg	McAlester	8.2	9.7	8.8	9.6	9.4
Tulsa	Glenpool	8.9	10.1	8.5	9.8	9.5
Tulsa	Tulsa @ 36th & Peoria	8.1	9.9	9.0	10.4	9.8

*All 2023 data is preliminary and subject to change



PM_{2.5} Designation Complications

> What years of data?

- > 2021, 2022, and 2023 likely years for state designation recommendations
- > 2022, 2023, and 2024 could be years for EPA designation
- > FEM continuous particulate analyzers found to have high bias
 - > Firmware correction has been implemented as of August 2023
 - Does not correct past data
 - Unsure how EPA will treat this data during designation process
- Exceptional Event Demonstrations
- > Opposition to the proposed rule in the U.S. Legislature



Ozone NAAQS

Current 2015 Standard is 0.070 ppm

- > EPA retained standard in 2020
- > EPA began reconsideration process in 2021
- EPA stopped reconsideration process and began new review of ozone NAAQS in August 2023
- During reconsideration process, majority CASAC recommendation was to lower standard (range 55-60 ppb)



Current Ozone Highs Chart

		4 th Highest Value (ppm)				3-Year Average		
County	Location	2020	2021	2022	2023*	'20-'22	'21-'23*	
Canadian	Yukon	0.065	0.070	0.069	0.073	0.068	0.070	
Cleveland	Moore	0.063	0.067	0.070	0.072	0.066	0.069	
Oklahoma	Choctaw	0.065	0.068	0.073	0.067	0.068	0.069	
Oklahoma	OKC @ Oklahoma Christian Univ.	0.069	0.069	0.072	0.072	0.070	0.071	
Tulsa	Glenpool	0.061	0.063	0.070	0.072	0.064	0.068	
Tulsa	Tulsa @ 36th & Peoria	0.058	0.064	0.073	0.075	0.065	0.070	
Tulsa	Tulsa Lynn Lane	0.059	0.068	0.073	0.078	0.066	0.073	
Creek	Mannford	0.062	0.063	0.070	0.070	0.065	0.067	
Osage	Skiatook	0.062	0.066	0.075	0.074	0.067	0.071	
Pittsburg	McAlester	0.066	0.066	0.064	0.072	0.065	0.067	
Dewey	Seiling	0.062	0.062	0.069	0.068	0.064	0.066	
Comanche	Lawton	0.066	0.065	0.068	0.071	0.066	0.068	

*All 2023 data is preliminary and subject to change



Regional Haze

Planning Period 2 State Implementation Plan (SIP) submitted August 9, 2022

- Region 6 deemed SIP submittal "administratively complete"
- > No action (to-date) on approval/disapproval
- Region 6 finishing up Round 1 first
 - Published proposed Federal Implementation Plan (FIP) for Texas and Oklahoma on July 26, 2023
- > Possibility of RH Rule Revision in early 2024
- > 5-year Progress report due 2025
- Round 3 due 2028



Other SIPs/FIPs

Permitting rule SIPs

- SC7 and SC8 minor New Source Review (NSR)
- SC7 permit exempt
- > EPA's Title V Emergency Affirmative Defense Removal
 - SC8 has similar language
- > Oklahoma's Good Neighbor Ozone SIP
 - SIP disapproval stayed
 - FIP effective date stayed
- Municipal Solid Waste (MSW) Landfills Emission Guidelines
 - > FIP in place for existing landfills
 - > SC47 updated, 111(d) Plan being submitted to EPA soon



Questions?

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