



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Interstate Transport: Georgia's Perspective

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AAPCA 2018 Spring Meeting
Lexington, KY
April 5, 2018



EPA's MARCH 27 TRANSPORT MEMO

- **Four-step framework for addressing the good neighbor provisions for ozone and PM_{2.5} NAAQS.**
- **Updated 2011/2023 modeling analysis**
 - Removal of water cells from 3x3 max. array
 - Contributions based on top 10 days in 2023
- **Appendix A**
 - Preliminary list of potential flexibilities
- **Appendix B**
 - Projected 2023 design values for nonattainment and maintenance areas
- **Appendix C**
 - Contribution analysis for nonattainment/maintenance areas



EPA's FOUR-STEP PROCESS

1. Identify downwind air quality problems;
2. Identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis;
3. Identify the emission reductions necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems; and
4. Adopt permanent and enforceable measures needed to achieve those emission reductions.



STEP 1

Identify downwind air quality problems



STEP 1

- Only receptors with current design values above the NAAQS should be considered as downwind receptors in the transport analysis.
- Appendix B contains two “maintenance” monitors that are meeting the NAAQS based on 2014-2016 design values.
 - Queens (NY), 36-081-0124, 2016 DV → 69 ppb
 - Harris (TX), 48-201-1039, 2016 DV → 67 ppb
- On May 1, design values for 2015-2017 should be available. These DVs should be examined to determine if receptors should be added or removed from Appendix B.
- Model performance should be examined at each receptor and each day used in the RRF calculation. Days with poor model performance should be removed from the analysis.



STEP 2

Identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis



STEP 2

- EPA's selection of a 1% threshold value used in CSAPR and CSAPR-Update is arbitrary and has never been supported by any scientific analysis.
- Contributions contained in Attachment C are not based upon a particular significance threshold.
- “Establishing a contribution threshold based on the variability in ozone design values that leverage some of the analysis and statistical data created to support the development of the Significant Impact Level for ozone”.
- In EPA's 2016 draft Significant Impact Level (SIL) Guidance, EPA recommends an ozone SIL value of **1.0 ppb**, based on an air quality variability analysis and the 4th highest daily maximum 8-hour concentration (averaged over three years).



STEP 3

Identify the emission reductions necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems



STEP 3

- **For states that need to perform this step, additional guidance is needed.**
 - Step-by-step examples
- **States should consider relative impacts:**
 - \$/ton vs. \$/ppb
- **The remedy for upwind states linked to maintenance receptors should be less stringent than for those linked to nonattainment areas.**
 - Upwind states could satisfy linkage(s) to maintenance receptors based on recent historic or modeled emission levels. No additional emission controls should be required.



STEP 4

Adopt permanent and enforceable measures needed to achieve those emission reductions



STEP 4

- For states that need to perform this step, additional guidance is needed.
- State rules adopted into the SIP
- State budgets adopted into the SIP
 - Tracking and reporting
 - Intrastate and/or interstate trading?
- PSD permit conditions
 - Do they need to be adopted into the SIP?



CONTACT INFORMATION

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