

Program Development Update

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IowaDNR

The Iowa Department of Natural Resources



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in caring for
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Overview

- NAAQS Updates
- More NAAQS Updates...
- Regional haze, MACT for EGUs
- Area Source NESHAP



PM2.5 NAAQS Updates

- Oct 8, 2009: EPA designated all areas in IA as attainment with 2006 24-hr standard
 - Muscatine: Possible redesignation in 2010
- Annual standard still under reconsideration
 - CASAC: 12-14 ug/m³
- Next PM2.5 NAAQS review started already
 - Proposal in January 2011
 - Finalize in October 2011
 - Infrastructure SIP due 2014

PM2.5 NAAQS Implementation

- **Infrastructure Plan due Sept 21, 2009**
 - Authority and program elements
 - EPA guidance issued on Sept 25, 2009
 - Public comment period ended October 5, 2009
 - Addressing comments
- **Implementation Plan due May 16, 2011**
 - Develop rules and implementation plan
 - Still waiting on final EPA NSR rules/guidance
 - Submit by August 2011

PM2.5 NAAQS Implementation (cont.)

(Planned Schedule)

- May - September 2010: Workgroups
 - Several sub-groups
 - Technical product development
- October 2010 - November 2010: Rule Drafting
- December 2010: EPC- Information
- January 2011: EPC- Notice of Intended Action
 - February – April 2011 Public Hearings
- May – June 2011: Finalize rule
- July 2011: EPC- final adoption

EPA Reconsidering Ozone Standard

- Response to concerns that 2008 ozone NAAQS is not protective of public health and environment
- To ensure the current ozone standard is scientifically sound and protective of human health

What EPA is Reconsidering

- Reconsidering both primary and secondary ozone standard
 - Original studies used in 2008 decision (1700+)
 - Public comments
 - Clean Air Science Advisory Committee (CASAC) recommendations
- Primary: 2008 staff/CASAC recommended range of 0.060 - 0.070 ppm (8-hr design value form)
- Secondary: multiple options
 - Same as primary
 - Time-weighted index (W126)

EPA Timeline for Reconsideration of Ozone NAAQS

Milestone	Date
Proposed rule for revised standard	December 21, 2009
Final rule for revised standard	August 31, 2010
States/tribal designation recommendations to EPA	December 2010
EPA notifies states concerning modifications to recommendations (120 day letter)	March 2011
Effective date of designations	August 2011
State Implementation Plans (SIPs) due	December 2013

Other NAAQS Changes Coming

- NO₂ Primary NAAQS
 - Proposed, comments due to EPA September 15, 2009
 - Tighter annual standard, new 1-hr standard?
 - Final rule- December 18, 2009
- SO₂ Primary NAAQS
 - Proposal expected November 16, 2009
 - Possible 1-hr standard?
 - Final rule- July 2, 2010
- NO₂/SO₂ Secondary NAAQS
 - Proposal expected July 2011
 - Final rule- Spring 2012

Last, but not Least

- Regional Haze SIP Update
 - EPA planning partial approval and disapproval
 - Disapproval will be related to CAIR = BART
 - Timing with planned CATR proposal a factor
 - Five year update will be due in 2013
- MACT for EGUs
 - Settlement requires Hg and other HAP controls for EGUs
 - Court previously vacated 2005 CAMR
 - EPA proposed rule by March 16, 2011
 - Final rule- November 16, 2011
 - Interim: EGU Hg testing requirements in 567 IAC 25

Area Source NESHAP

Brief Chronology

- **Pre-2005:** 15 NESHAP issued – e.g. Dry Cleaners, Halogenated Solvent Cleaners, and Chromium Electroplaters
- **2006-2007:** 10 NESHAP issued – e.g. Clay & Ceramic Products, Lead Acid Battery, Wood Preserving and Hospital EtO Sterilizers
- **January 2008-now:** 9 NESHAP issued, so far - More small businesses and previously unregulated facilities impacted

Area Source NESHAP

Overall Challenges

- Estimate 3000-5000 facilities in Iowa could be impacted by area source NESHAP
- Several NESHAP issued at or near the same time
- No additional funding from EPA
- Limited staff and resources
- Some facilities may be subject to more than one NESHAP

Area Source NESHAP Facing the Challenges

NESHAP Implementation Group

- Formed in March 2008
- Cooperative effort among DNR – Air Quality Bureau, University of Northern Iowa – IAEAP, Iowa Department of Economic Development – Small Business Liaison, Linn & Polk County Local Air Programs
- Developing outreach strategies
- Working with impacted stakeholders

Area Source NESHAP Facing the Challenges

Implementation Approaches

- DNR vs. EPA implementation
- Developing outreach and compliance assistance strategies specific to each NESHAP
 - Identifying affected facilities
 - Presentations & workshops
 - Fact sheets, Guides, & other outreach materials
 - Website (for easier access)
 - Listserv and newsletters
 - Streamlined permits & registration forms

Area Source NESHAP

The Future

- EPA is under an **October 15, 2009**, deadline to issue NESHAP for 15 additional area source categories, including:
 - Chemical Manufacturing
 - Paint and Allied Products
 - Prepared Feed Manufacturing
 - Pharmaceutical Production (not yet proposed)
- EPA is under April 2010 deadline to propose and December 15, 2010 deadline to issue NESHAP for industrial, institutional and commercial boilers

Keeping up on NESHAP

- Visit the new DNR NESHAP website at www.iowadnr.gov/air/prof/NESHAP/
- Visit EPA's area source websites at <http://www.epa.gov/ttn/atw/area/compilation.html> and <http://www.epa.gov/ttn/atw/area/arearules.html>
- Sign up for EPA and DNR air quality listserv
- Contact DNR or UNI with questions

NESHAP Contact Information

- Iowa Department of Natural Resources
 - Christine Paulson - DNR Air Quality Bureau
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- Technical air assistance for small businesses
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