Assessment of International Transport and Improved Ozone Air Quality

Prepared by the

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The Clean Air Act requires EPA to establish primary National Ambient Air Quality Standards at levels that "allowing an adequate margin of safety, are requisite to protect the public health." In addition, the Act recognizes that the States have primary authority for designing and administering the plans that bring areas into attainment, and maintain those standards. And in certain areas States are authorized by the Act to demonstrate that those plans would be adequate to attain and maintain those standards if the standards would be achieved "but for" emissions emanating from outside the U.S.

On June 6, 2017, the EPA Administrator extended the deadline for promulgating designations related to the 2015 ozone NAAQS and in doing so stated that states have made "tremendous progress and significant investment cleaning up the air." The same letter also identified international transport as one of the complex issues that it would be reviewing during the extension period.

International Transport

To illustrate the significance of the role of international transport on ozone air quality in the U.S., the Midwest Ozone Group has reviewed EPA's modeling data in support of the Cross State Air Pollution Rule (CSAPR) projections for 2017 to identify boundary conditions, initial conditions, Canadian, and Mexican emissions from 2011, all of which can be fairly viewed as constituting international emissions.

When this data is plotted on the attached map of the U.S., it can be seen that but for international transport no monitor in the United States would have an ozone concentration in 2017 greater than 66 ppb – well below the 2015 ozone NAAQS of 70 ppb.

Given the fact that any area in nonattainment with standard NAAQS is subject to significant restrictions on economic development and job growth, given the significant role of international emissions, and given the dramatic reductions already undertaken across the U.S., it is imperative that implementation of the 2015 ozone NAAQS be undertaken in a way that does not unreasonably burden States with further control obligations, and reward international competitors at the expense of American workers.

Improved Ozone Air Quality

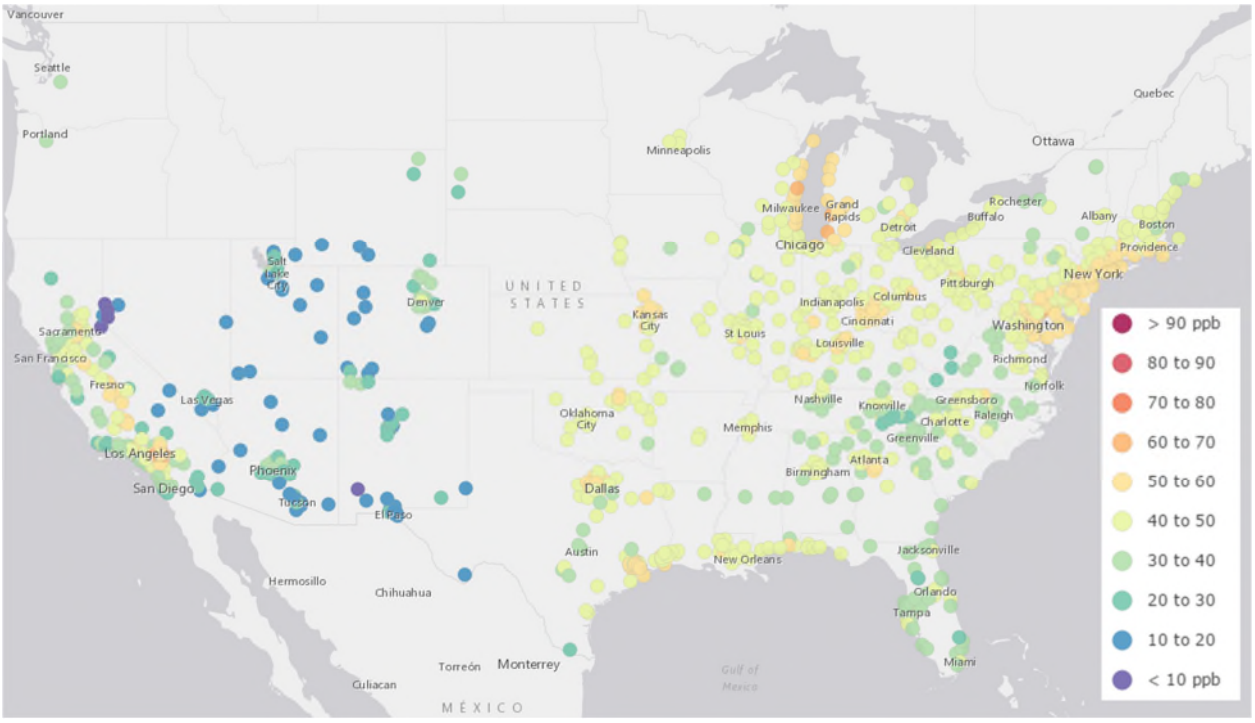
To illustrate the progress that states have made to reduce ozone concentrations, MOG has taken the most recent monitoring and modeling data and applied it to a series of maps to illustrate the monitors that remain in nonattainment at ozone concentrations from 70 to 75 ppb. These maps may be found at: http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality_6.22.17.ppt.

Conclusion

International emissions are a significant contributor to ozone concentrations to all monitors in the U.S. But for international emissions, no monitor in the U.S. is predicted by EPA to have an ozone concentration greater than 66 ppb in 2017. Given the tremendous progress that has already been made by states in improving air quality, properly addressing international emission will eliminate the negative impact of the ozone NAAQS on economic development and job growth.

A copy of this paper may be found at:
http://www.midwestozonegroup.com/files/Assessment_of_International_Transport_and_Improved_Ozone_Air_Quality_6.22.17.docx

But for international emissions, no monitor in the US would exceed 66 ppb of ozone in 2017



No monitor with dv greater than 66 ppb

Only 11 monitors with dv greater than 60 ppb

Data source: http://www.epa.gov/sites/production/files/2015-11/2017_ozone_contributions_transport_noda.xlsx