

EQC Agenda Item I

Adoption of Grants Pass Carbon Monoxide and Particulate Matter (PM₁₀) Limited Maintenance Plans

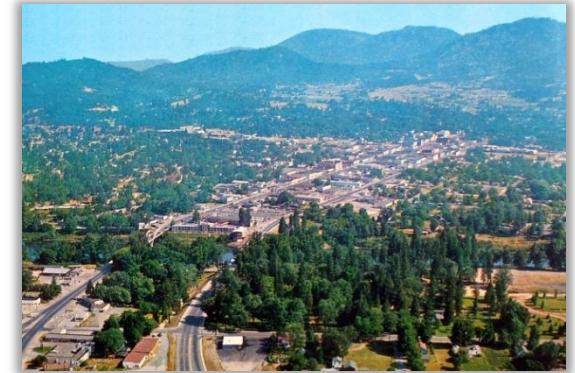
Thursday, April 16, 2015



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Overview

- Proposed 10-year maintenance plans will ensure compliance with **Carbon Monoxide** and **Particulate Matter (PM₁₀)** air quality standards in Grants Pass until 2025.
- Revises Oregon Clean Air Act State Implementation Plan (SIP) in OAR 340-200-0400.



What's a maintenance plan?

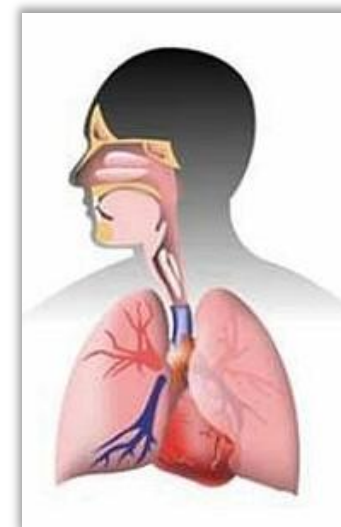
- State-adopted plan submitted to EPA containing enforceable measures for a specific air pollutant, designed to prevent a community “re-violating” a federal health standard for the next 10 years.
- Comes AFTER an “attainment plan” – the first plan adopted for a *Nonattainment Area* (community which violated a federal health standard).
- Attainment plan contains more stringent measures and must show compliance by a certain date.
- Maintenance plan removes some measures but keeps those needed to ensure compliance.

EPA's Air Quality Standards

- EPA sets air quality standards to protect health for six common air pollutants.
- This rulemaking addresses two of them:

Carbon Monoxide: a colorless, odorless gas, caused by incomplete combustion of carbon-based fuels (like gasoline) - mostly associated with motor vehicles.

PM₁₀: small particulate matter (<10 microns in size) like soot from wood burning, and windblown dust.



Current CO and PM₁₀ standards

Carbon Monoxide

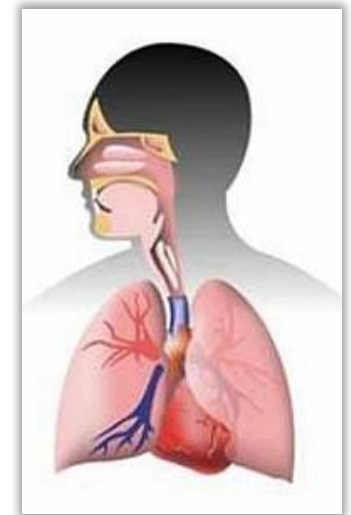
- 1-hour average, 35 parts per million (ppm)
- 8-hour average, 9 ppm

PM₁₀

- 24-hour average, 150 micrograms per cubic meter (ug/m³)
- Annual average, 50 ug/m³

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- ✓ PM₁₀ is the “old” standard, replaced* by PM_{2.5} standard in 1997.

* *PM₁₀ 24-hour standard still applies*

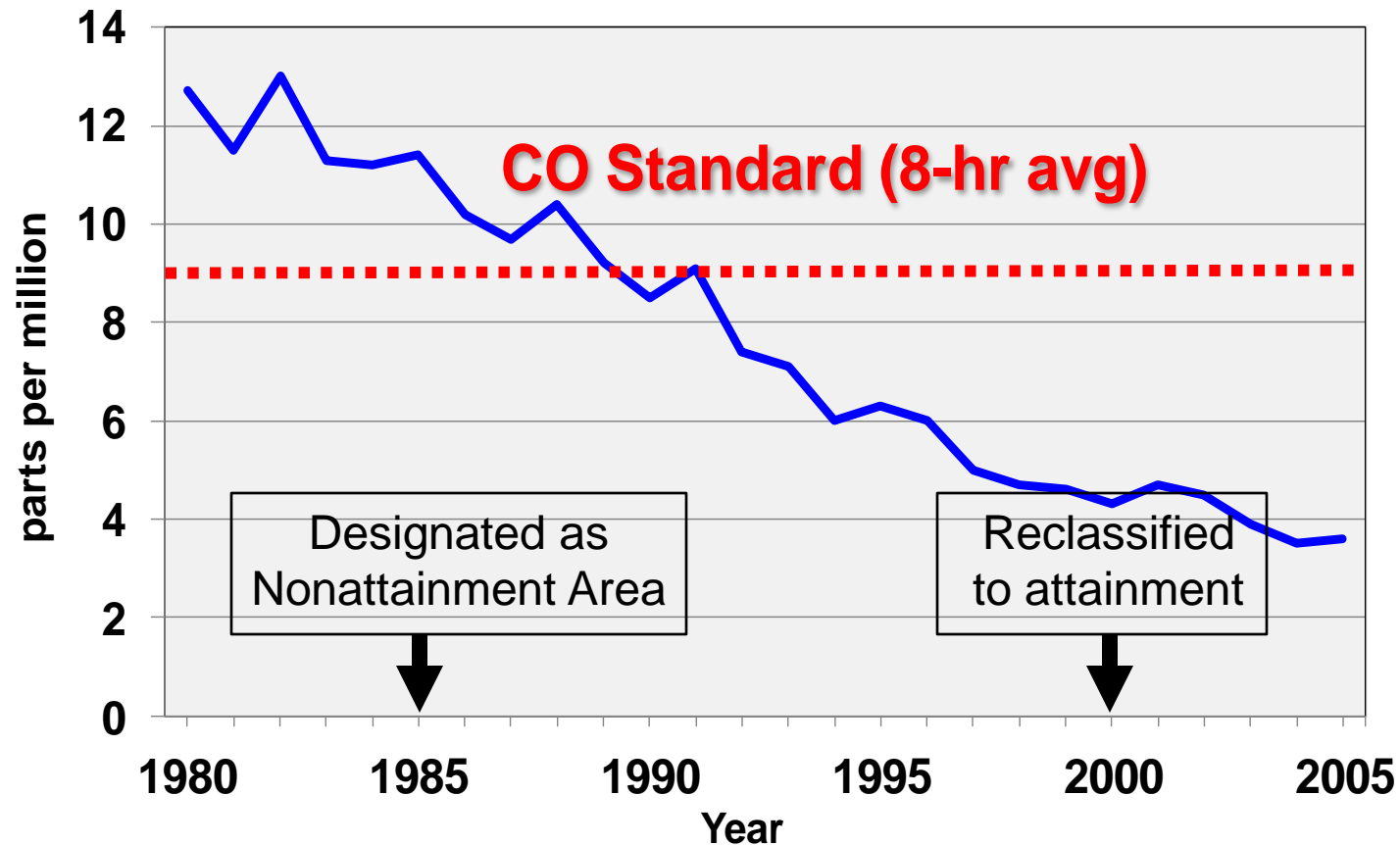


Grants Pass – a success story

- Major air quality improvements over last 20 years. Current levels CO and PM₁₀ well under both standards.
- Historically, violations occurred mostly in winter.
 - **Primary CO sources:** about 70% from motor vehicles and non-road engines, 25% home wood-heating.
 - **Primary PM₁₀ sources:** about 65% home wood-heating, 20% industry.
- Current maintenance plans now expiring – new 10-year plans are required. Will be the final plans.
- EPA allows **limited maintenance plans** for areas at low risk of exceeding standards.

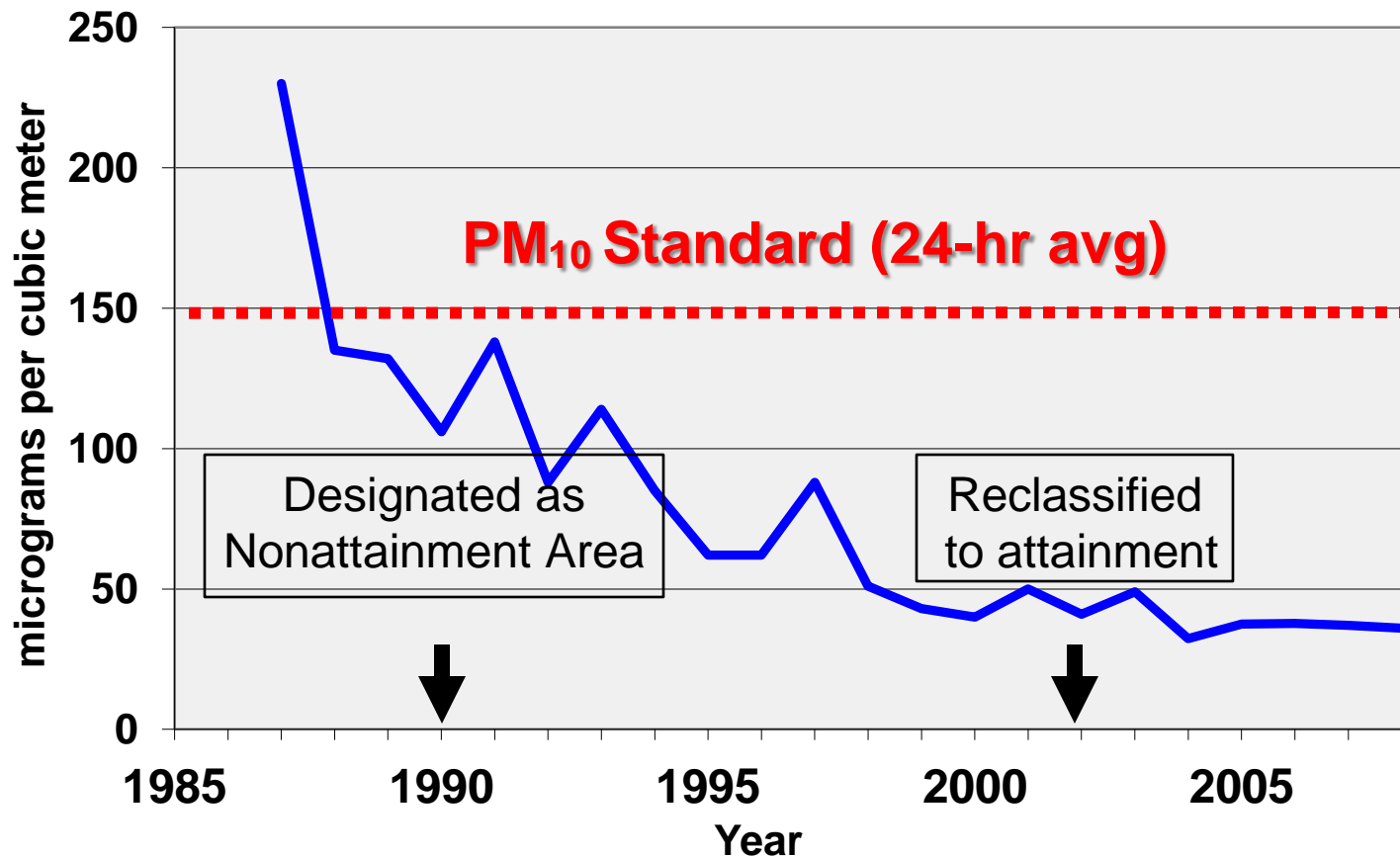
CO trends Grants Pass

1980 to 2005



PM₁₀ trends in Grants Pass

1987 to 2008



Limited Maintenance Plan criteria

- Area must be attaining standard and low risk of re-violating. Also, limited emissions growth expected from on-road motor vehicles.
- Air quality levels must meet a “design value” significantly below the standard.
- No new control measures are required.
- Must keep control measures from first maint. plan, except can eliminate **motor vehicles emissions budget or cap.**

Maintenance Plan Contents

- **Geographic area covered.** The urban growth boundary.
- **History** of air quality and compliance with health standard.
- **Emissions Inventory.** The most significant sources.
- **Continuing Control Measures.** Measures from the first maintenance plan that will be continued.
- **Contingency Plan.** Backup plan should a violation occur in the future.
- **Verification of Continued Attainment.** How compliance will be tracked and confirmed.

Continued CO control measures

1. Primary measure has been federal clean car standards. Single largest factor in reducing CO emissions in Grants Pass.
2. Industrial controls on new or expanding sources.
3. Woodstove emission reduction strategy for PM₁₀. Also helps reduce CO emissions.



Continued PM₁₀ control measures

1. Several woodstove measures – voluntary daily curtailment program, federal emission standards for new stoves, and removal of un-certified woodstoves upon home sale. Most effective strategy in reducing PM₁₀ in Grants Pass.
2. Industrial controls on new or expanding sources
3. Outdoor open burning restrictions
4. Prescribed forestry burning smoke management protection.



Fiscal Impact

- Very little. Both plans require no new controls.
- Eliminating the *motor vehicle emissions budget* avoids need to conduct computer modeling for transportation conformity – estimated \$30,000 savings for the local transportation planning agency.

Verification of Attainment

- PM₁₀ and CO monitoring discontinued (with EPA approval) in 2008 and 2005 respectively, due to very low levels.
- For PM₁₀, an existing PM_{2.5} monitor will be used to estimate PM₁₀ levels.
- For CO, currently no monitoring. DEQ will assess CO emissions every 3 years, as part of a statewide emission inventory, to determine if any significant emission growth.

Public Comment Process

- Public comment period: 12/16/14 to 1/26/15.
- Public hearing 1/22/15: no testimony provided.
- No other comments on this rulemaking.



DEQ Recommendation

DEQ recommends Commission approve:

1. Adopt the proposed amendment to OAR 340-200-0040 in Attachment A-1 to incorporate the proposed rules into the Oregon Clean Air Act State Implementation Plan;
2. Approve the two limited maintenance plans for Grants Pass in Attachments A-2 and A-3;
3. Direct DEQ to submit the SIP revision to EPA for approval.