

AGENDA NOTE – HRPDC EXECUTIVE COMMITTEE MEETING

ITEM #8: HRPDC RESPONSE TO EPA OZONE CONCERN

SUBJECT:

The EPA has proposed changes to the National Standard for Ozone.

BACKGROUND:

On November 25, 2014, the Environmental Protection Agency (EPA) proposed strengthening the National Ambient Air Quality Standard (NAAQS) for ground-level ozone to a level within the range of 0.065 to 0.070 parts per million (ppm). The EPA is also proposing changes to the ozone monitoring seasons, the Federal Reference Method for monitoring ozone in the ambient air, Federal Equivalent Method procedures for testing, and the Photochemical Assessment Monitoring Stations network. The EPA is under court order to finalize the new standard by October 1, 2015.

The current NAAQS for ground-level ozone is the 2008 standard (0.075 ppm). The value compared against the standard is the annual, fourth-highest daily maximum 8-hour concentration, averaged over three years. The Hampton Roads area has been designated an attainment area for the current standard.

The previous NAAQS for ground-level ozone was the 1997 standard (0.08 ppm). The value compared against the standard was the annual, fourth-highest daily maximum 8-hour concentration, averaged over three years. The Hampton Roads area was designated a maintenance area for the 1997 standard in 2007. However, the EPA has now revoked the 1997 standard.

Mr. Tom Ballou, Director of the Office of Air Data Analysis & Planning, Virginia Department of Environmental Quality, will brief the HRPDC on the status of the air quality rules and potential impacts to Hampton Roads. A proposed letter from the HRPDC Chairman to the EPA has been prepared for approval by the Commission.

Attachment 8

Note: This item will be presented for action under Consent Agenda item #13-E

MEMBER
JURISDICTIONS

September 17, 2015

CHESAPEAKE

Ms. Gina McCarthy
Administrator

FRANKLIN

United States Environmental Protection Agency
Mail Code 1101A

GLOUCESTER

1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

HAMPTON

RE: HRPDC Response to Proposed EPA Ozone Requirements

ISLE OF WIGHT

Dear Administrator McCarthy:

JAMES CITY

I am writing on behalf of the Hampton Roads Planning District Commission (HRPDC) to submit comments on the current proposal by the EPA to revise the National Ambient Air Quality Standards (NAAQS) for ozone.

NEWPORT NEWS

The HRPDC is a voluntary organization of seventeen local governments representing 1.7 million residents that encourages and facilitates local government cooperation and state-local cooperation in addressing on a regional basis, problems of greater than local significance. This response to the proposal by the EPA is a perfect example of local governments cooperating on regional issues. Two of our member localities, Virginia Beach and Newport News along with the Hampton Roads Chamber of Commerce have also submitted comments expressing their concerns about the proposal to revise the current ozone standard.

NORFOLK

POQUOSON

PORTSMOUTH

SMITHFIELD

SOUTHAMPTON

Newport News and the Chamber of Commerce noted that the proposed change in ozone regulations would result in a loss of \$69 billion in Gross State Product from 2017 to 2040. Virginia Beach stated that the vast majority of air quality standards exceedances have occurred due to naturally occurring or one-time events such as the large scale fire in the Dismal Swamp National Wildlife Refuge that smoldered for months.

SUFFOLK

SURRY

VIRGINIA BEACH

The Hampton Roads localities are concerned that the consideration of a change in the ozone standard while the current standard is still being implemented will have negative consequences on the economy of the region. Significant progress in improving air quality has been made in the Hampton Roads area in recent years, however, this progress would be negated with an arbitrary change in the standard that would place the region in nonattainment status. The Region is also concerned that the EPA's own Clean Air Scientific Advisory Committee (CASAC) has acknowledged a level of uncertainty in the scientific data regarding this issue.

WILLIAMSBURG

YORK

Ms. Gina McCarthy
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Based on all of the aforementioned concerns, the HRPDC recommends that a careful and comprehensive evaluation be completed before any change is made to the current standard with specific consideration to the economic health of the Region.

Thank you for this opportunity to submit comments on the proposal to revise the ozone standard. If you have any questions regarding the above or would like to discuss this topic further, please do not hesitate to contact Mr. Robert A. Crum, Jr., Executive Director at 757-420-8300 or rcrum@hrpdcva.gov

Sincerely,

Kenneth I. Wright
Chair

MK/jc

Copy: Commissioners