

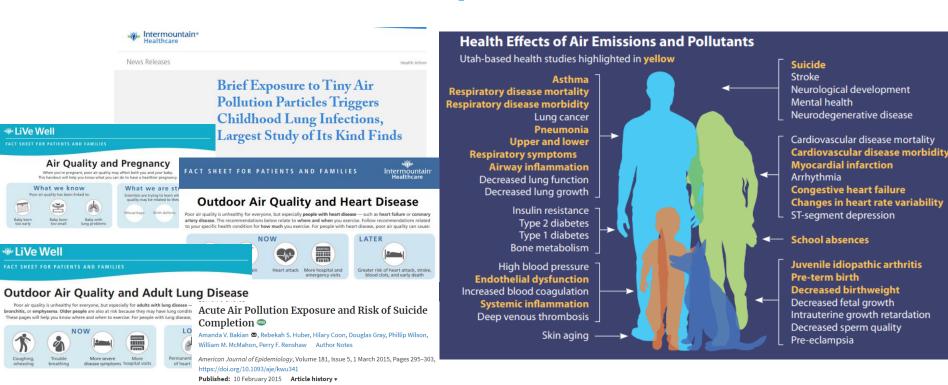


Ozone Update
Bryce Bird 9/15/2021

## **Air Pollution Hurts People**

Split View

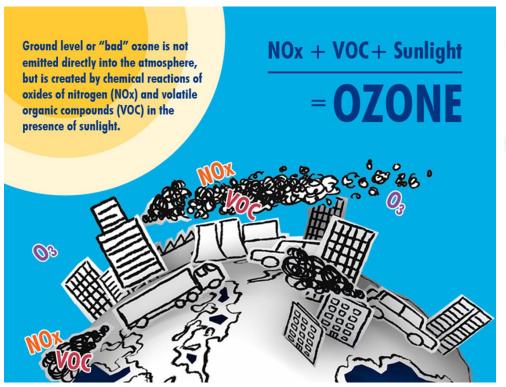
66 Cite Permissions

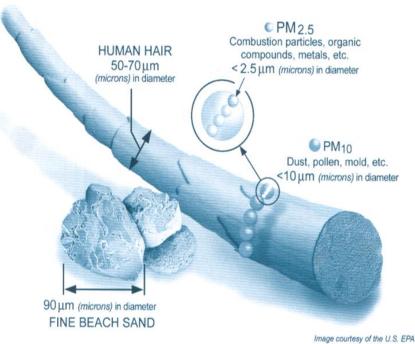


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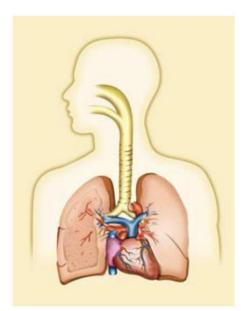


#### **Ozone and Particulate Pollution**





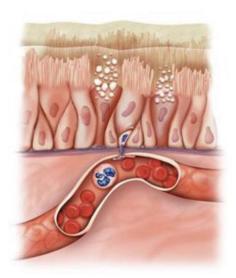
#### **Ozone and Health**



Ozone is a powerful oxidant that can irritate the airways.



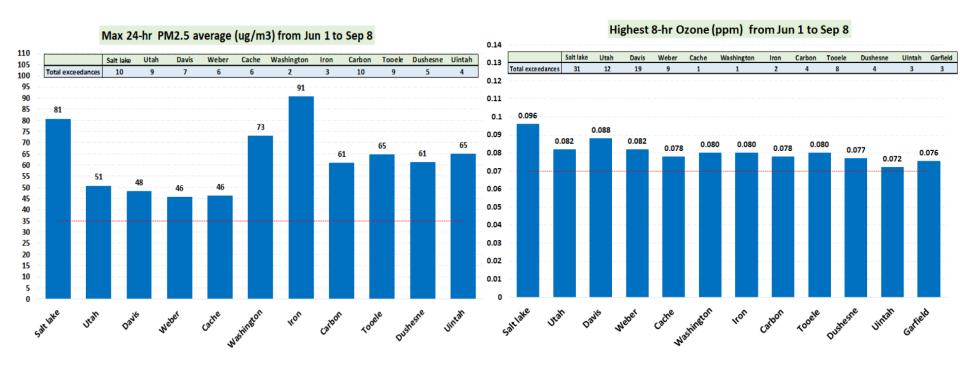
Ozone can cause the muscles in the airways to constrict, trapping air in the alveoli. This leads to wheezing and shortness of breath.



With inflammation, the airway lining is damaged. It has been compared to the skin inflammation caused by sunburn.

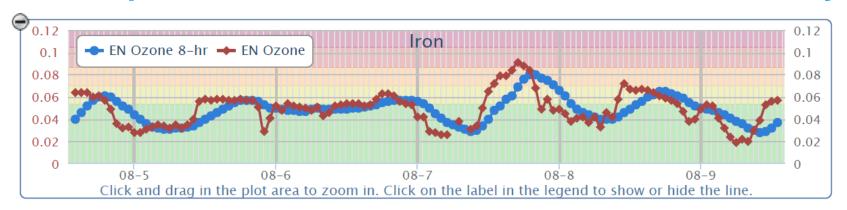


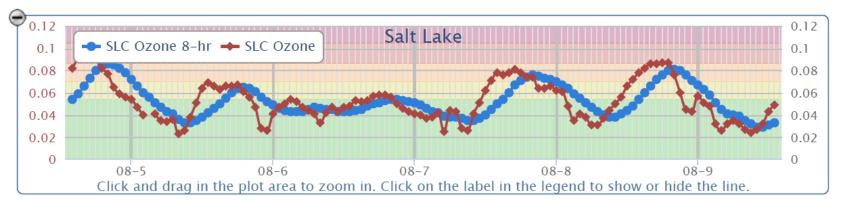
#### **Ozone and Particulate Pollution Summer 2021**





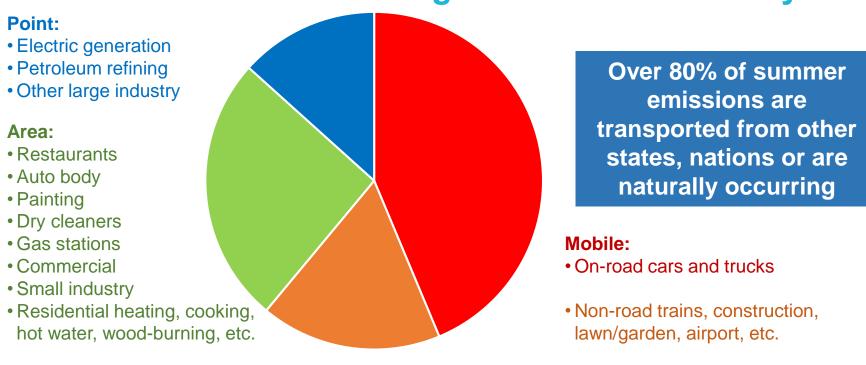
### Ozone peaks with afternoon heat and solar intensity







# Sources of Utah Man-Made Emissions in the Northern Wasatch Front on an average "ozone season" day.



Area Sources

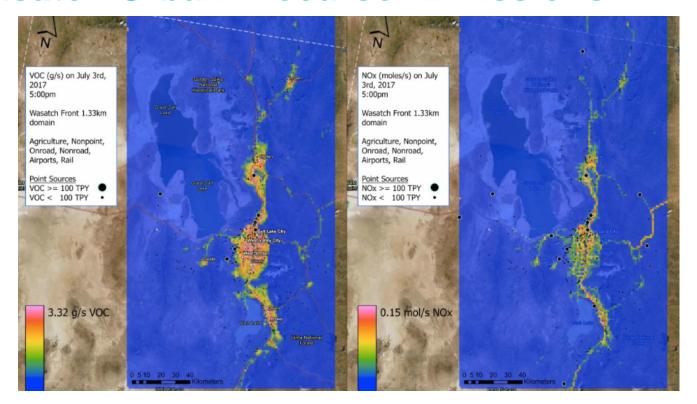
Point Sources



On Road Mobile

Non-Road Mobile

## **Wasatch Urban Precursor Emissions**



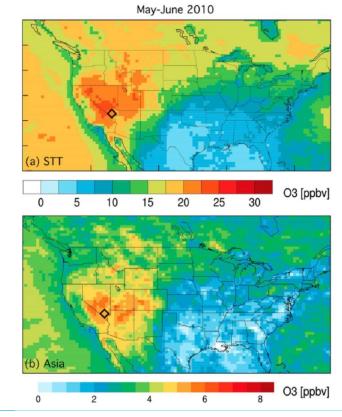


## Natural, transported, boundary and background

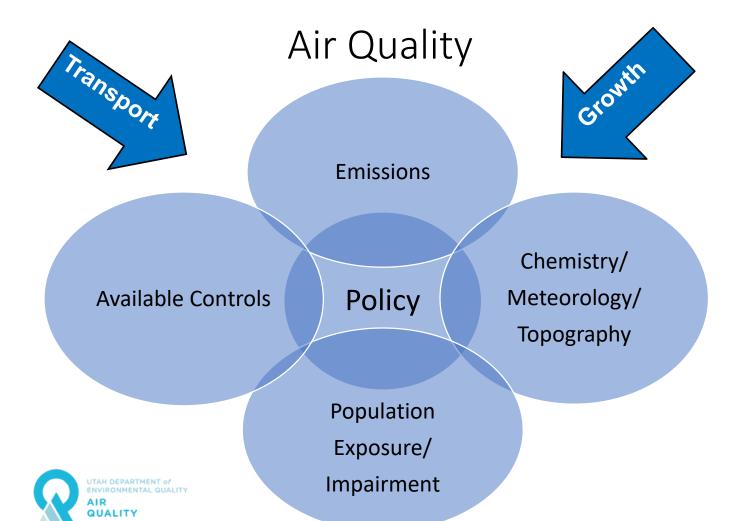
Many high elevation rural areas in the western US experience elevated ozone due to natural ozone, natural precursor emissions, and transported emissions from within the US and internationally.

Stratospheric intrusion, fire smoke, and biogenic VOC contribute to the natural background levels of ozone

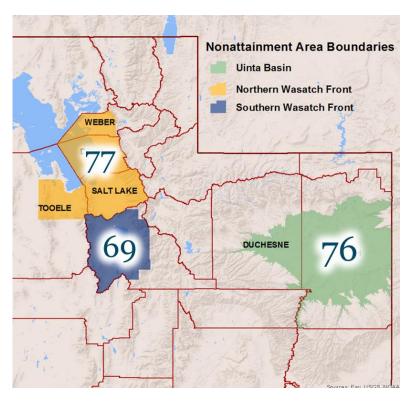
The local emissions are added to the background emissions that result in exceedance days along the Wasatch Front.







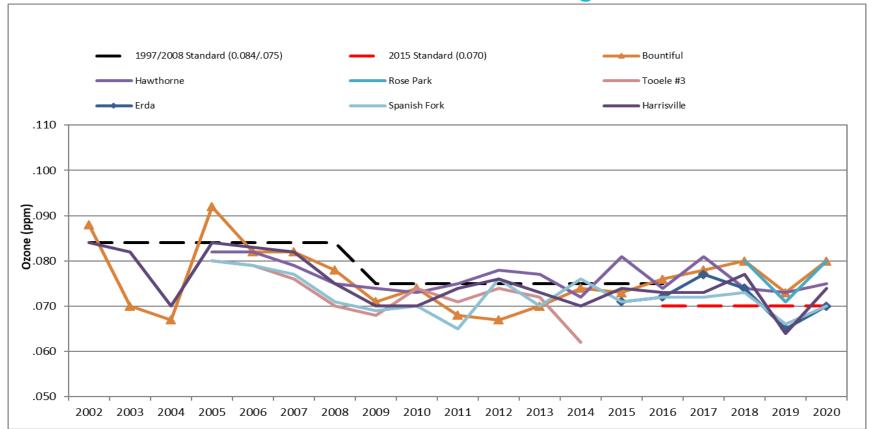
#### **Utah Ozone Nonattainment Area Planning**



- EPA designated three nonattainment areas in Utah for the 2015
   Ozone Standard of 70ppb as a three year average if the 4<sup>th</sup> highest daily 8-hour average at a regulatory monitor.
- Nonattainment areas are currently classified as Marginal.
  - Emissions inventory (submitted August 2020);
- Attainment deadline: August 2021 (to be based on data from 2018, 2019, & 2020)
- If the standard is not met, we will be bumped up to Moderate
- A Moderate SIP requires:
  - 15% reduction of both NO<sub>x</sub> and VOCs (Ozone precursors);
  - Vehicle Inspection and Maintenance Program (population threshold);
  - Reasonably Available Control Technology installed on point sources; and
  - Demonstration of attainment by August 2024.



#### **Utah Ozone Nonattainment Area Planning**





#### **Utah Ozone Nonattainment Area Planning**



- Inventory
- Modeling
- Control Strategy Development

Bumped up to

Moderate

- Draft SIP for Public Comment
- SIP Due
- RACM/RACT Due
- Requires 15% reduction in VOC from baseline inventory

Attainment

Deadline



#### Clean Air Act Section 179 International Borders



Allows relief from certain Clean Air Act requirements

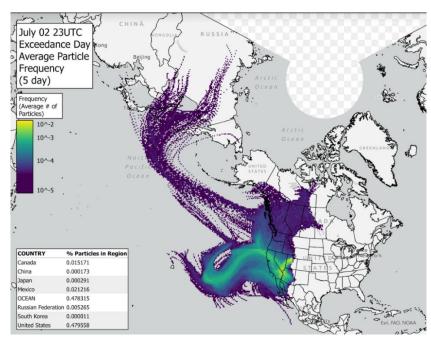
Perceived as a delay to improving air quality and public health





#### International Transport – International Border Areas

Section 179 of the Clean Air Act allows relief from certain obligations for states with ozone nonattainment areas if they demonstrate to the satisfaction of the EPA Administrator that the area would comply with the air quality standard "but for emissions emanating from outside of the United States."



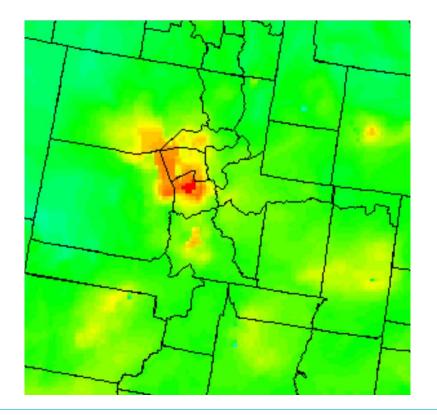


Guidance - https://www.epa.gov/ground-level-ozone-pollution/international-transport-air-pollution

## Moderate vs Marginal designation for Utah

Allows more time to identify controls and understand ozone formation in Utah

Nearly all sources already meet the more protective BACT/BACM that is in place for VOC and nitrogen oxide under the State Implementation Plans for PM2.5





#### 179 (a) and (b) International Transport Options

## Prior to 2021 Attainment Deadline

- Marginal requirements still apply
- Avoid bump-up to Moderate

#### Part of a Moderate SIP Attainment Demonstration

- SIP elements still required
- Not required to model attainment
- If approved, avoid bump-up to "Serious"



#### 179B Demonstration

#### **News and Announcements**

## Clean Air Act 179B(b) Demonstration Northern Wasatch Front Ozone Nonattainment Area

The Utah Division of Air Quality has submitted to the EPA it's International Transport Demonstration, also known as 179B(b), for the Northern Wasatch Front Ozone Nonattainment Area. A 179B(b) demonstration provides relief from a bump-up in nonattainment status if the state can prove that the area would have met the National Ambient Air Quality Standard but for the influence of pollution emanating from an international source. A successful 179B(b) demonstration would prevent the Northern Wasatch Front from being reclassified from marginal to moderate status in the upcoming Determination of Attainment by Attainment Date, which is expected in the next year.

https://documents.deq.utah.gov/air-quality/planning/air-quality-policy/DAQ-2021-005764.pdf



#### 179B Demonstration

In late 2020, EPA issued guidance on the preparation of demonstrations under 179B. The approach is novel because in the past 179B had only been used in states with an international border.

After prolonged discussions with EPA technical staff and early briefings to environmental advocacy stakeholders, DAQ identified three assessment tools that could test if there was a clear and causal connection to international emissions with ozone exceedances along the Wasatch Front.



## 179B Demonstration - Analysis

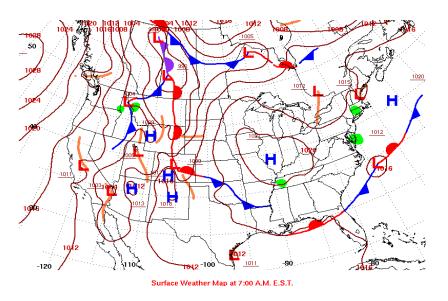
- Synoptic analysis looked at storm front events that could quickly deliver international emissions to the Wasatch Front area and compare exceedance with non exceedance days
- Back trajectory analysis to see if there was an observed correlation between the movement of near-term air parcels with exceedance versus non exceedance days
- Global chemistry and meteorology modeling to apportion the local, US and international contribution to ozone exceedance days

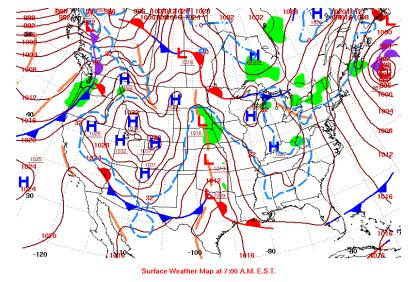
Tests one and two are most applicable to near border areas



## 179B Demonstration – Synoptic Analysis

Looks at surface air movement that can quickly bring emissions from long range sources

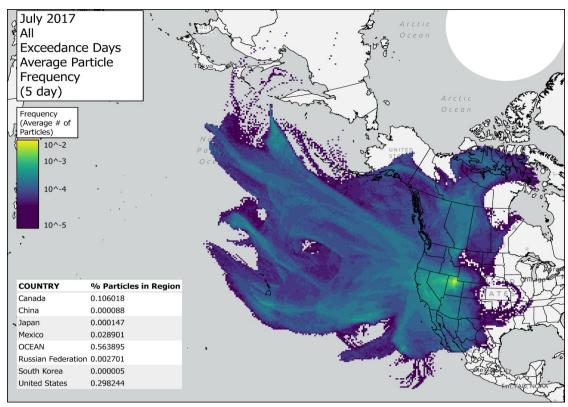




Found that exceedance days were closely associated with periods of increasing stagnation with high pressure settling in across much of the inner mountain west.

## 179B Demonstration - HySPLIT Backward Dispersion Analysis

No significant difference in near term transport patterns between exceedance and nonexceedance days that would point to a specific location that was contributing air pollutant emissions to the Wasatch Front in the 5 days prior to an ozone exceedance event.





#### 179B Demonstration – Global Photochemistry Model

In order to meet EPA's timeline for submitting a demonstration (6-months after the guidance was finalized) it was not possible for DAQ to complete global photochemistry modeling because the required inputs for boundary emissions inventories to cover the baseline period for the nonattainment designation were not available from EPA.

The Utah Petroleum Association and Utah Mining Association contracted with a national environmental consulting company, Ramboll, (the developer of EPA's photochemical air pollution computer model) to perform modeling with older data sets to provide a proof of concept that the contribution of international emissions could be determined and the preliminary results showed that "but for" the contribution of international emissions, the area would have attained the standard by the attainment date as required by CAA Section 179.



#### 179B Demonstration – Global Chemistry Model

To evaluate the potential applicability of the Section 179B(b) provisions for the NWF NAA, Ramboll conducted a preliminary modeling analysis that quantitatively estimated the contribution from global international transport of ozone. They applied both the Community Multiscale Air Quality (CMAQ)4 and the Comprehensive Air quality Model with extensions (CAMx)5 photochemical models using EPA-derived meteorology and emission datasets representing conditions using the best available data set. They also considered two approaches, a sensitivity analysis and a source apportionment method.

Ramboll concluded that results from both approaches and models show that the Wasatch Front would attain the 70ppb ozone standard in the absence of international anthropogenic contributions



#### 179B Demonstration – Submission

These three analyses taken together indicate that in the NWF, exceedances of the 8-hour ozone NAAQS typically occur on hot, atmospherically stable summer days and that international transport of ozone contributes consistently to background concentrations to the Wasatch Front, but does not increase in contribution on specific exceedance days.

Acknowledging that the technical rigor described in EPA's Section 179B guidance was not yet available, DEQ developed a full photochemical modeling protocol that will be able to quantify the contribution of transported ozone from international sources to ozone levels in Utah and requested that EPA review the preliminary information contained in the submission and provide definitive feedback on the following:

- 1. Can the novel interpretation of 179B(b) for the NWF result in a satisfactory demonstration?
- 2. If yes, is the additional modeling exercise outlined in this packet required for a satisfactory 179B(b) demonstration, or are the materials contained herein sufficient?

