

National Park Service  
Briefing Paper

Prepared for: Director  
Submitted: July 15, 1997 States: All

Title: NPS Involvement in Updated National Ambient Air Quality Standards (NAAQS) for Ozone and Particulate Matter (PM)

Issue:

- o What is NPS reaction to the new "final" NAAQS, and how will the new standards impact park lands?

Background:

- o On June 26, 1997, President Clinton announced his intent to promulgate revised, somewhat more stringent primary or health based NAAQS for ozone and PM. In years of interagency meetings with the Environmental Protection Agency (EPA), the Office of Management and Budget (OMB), and others, NPS and the Department of the Interior (DOI) supported EPA's interpretation of the law and science as requiring more stringent standards both for human health (primary standard) and for welfare (secondary standard, which addresses ecological effects).
- o Last November, EPA proposed new primary standards for ozone and PM, as well as a secondary standard for ozone. At that time, the Assistant Secretary for Fish and Wildlife and Parks issued substantive comments supporting EPA's proposed revisions as directionally correct, while encouraging EPA to consider consensus recommendations of eminent scientists which found EPA's proposed secondary ozone standard insufficient to protect sensitive vegetation on DOI lands, such as, Class I parks and wilderness areas. In addition, the Assistant Secretary's comments supported EPA's decision to fulfill its mandate to develop a regional haze program for Class I areas, while encouraging EPA to reconsider its proposal to forgo a separate secondary standard for PM. DOI expressed concern that without such a standard visibility at Class II areas would remain impaired, and soils, streams, other natural and cultural resources would lack NAAQS protection.
- o In a series of high-level interagency meetings this year, DOI continued to support EPA's NAAQS proposals as directionally correct, while noting they did not go far enough to protect our sensitive resources. Some agencies, such as Office of Management and Budget (OMB) are highly critical of EPA's proposals, primarily from a cost perspective. Generally, public citizen opinion has mirrored DOI's position, while many industry groups and members of Congress have criticized the proposals as based on incomplete science and too costly to implement. The NAAQS have been the subject of Congressional hearings and correspondence.
- o The "final" NAAQS announced by President Clinton largely maintain EPA's proposed primary (health) standards, but lack secondary (welfare, ecological effects) standards. The President also made clear his support for flexibility in implementation. For further

details, see EPA's summary (attached). The regulations and accompanying Regulatory Impact Statement (RIA) are still undergoing interagency review for fine-tuning. Under court order, the regulations must be promulgated by July 19, 1997.

- o Even though the final NAAQS are somewhat weaker than the November proposals, still a significant number of NPS Class II and some Class I areas are anticipated to be classified in "nonattainment" of these standards; i.e., meaning EPA will require emissions reductions (including emissions offsets for new sources) to benefit these areas. For example, based on review of available NPS and state data, 5 Class I areas (including Great Smoky Mountains and Sequoia/Kings Canyon National Parks) may not attain the primary ozone standard (see attached map).

Status:

- o NPS is assisting DOI in the final stages of interagency review for the regulations and RIA. After the rules are promulgated, Congress will have 60 working days to review them before they may take effect. Additional Congressional hearings and correspondence are anticipated.
- o NPS will work with EPA, other land management agencies, states, and tribes to identify NPS units in "nonattainment" of the proposed health standards, develop appropriate monitoring plans, develop appropriate new source permitting procedures, and develop implementation plans to reduce emissions. In addition, NPS will continue to participate in efforts to develop further information to aid in development of protective secondary (welfare) standards for the future.

Position of Interested Parties:

- o See "background" above.

NPS Perspective:

- o NPS supports the "final" NAAQS as directionally correct, and looks forward to achieving emissions reductions to protect sensitive resources. NPS will respond to Congressional inquiries, as appropriate. See "status" above.

Contact:

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**1996 Attainment Status of NPS and FWS Monitoring Sites  
With EPA's New Ozone Primary Ambient Standard  
(8-hr, 3-yr average 4th daily maximum, 0.08 ppm)**



Source: 1994-1996 NPS and State data

**COMMENTS:**

### Implementation of the Standards

Although the law requires EPA to set air quality standards that, above all, protect the public health, the agency has developed a plan for affordably meeting the new standards through common sense measures. Along with these final standards for ozone and particulate matter, EPA will issue an **implementation package** designed to give states, local governments and business the new flexibility they'll need to meet protective public health standards in a reasonable, cost-effective way.

- ° The **Ozone Implementation Package** will use a regional, state-sponsored plan to address the long-distance transport of ozone. As that plan's reductions take effect, the vast majority of areas that do not currently meet the new ozone standard will be able to do so without additional new local pollution controls or measures. In order to help these areas avoid burdensome measures associated with non-compliance, EPA will create a new "transitional" classification. These areas would not have to comply fully with the new ozone standard by achieving local pollution controls until at least 2004, with no compliance determination required until at least 2007.
- ° The **Particulate Matter Implementation Package** will give businesses ample time to find the most cost-effective pollution controls. In addition, EPA will complete another full scientific review of the health effects of fine particulates before any "non-attainment" designations are made or local controls mandated. EPA will allow five years to gather and analyze necessary data, and then use its discretion under the Clean Air Act to allow another three years for areas that are not in compliance to submit air quality plans on how they will meet the new standard. Following another year and a half for review of the plans, it will be several more years before many areas will actually have to comply with the new standard.

## **Achieving Clean Air in Common Sense, Flexible and Affordable Ways**

Although the law requires EPA to set air quality standards that, above all, protect the public health, the agency has developed a plan for affordably meeting the new standards through common sense measures. Along with any final standards for ozone and particulate matter, EPA will issue an **implementation package** designed to give states, local governments and business the new flexibility they'll need to meet protective public health standards in a reasonable, cost-effective way.

### **Implementing the Ozone Standard**

**AVOID NON-COMPLIANCE "STIGMA"** -- EPA will create a new "transitional" classification for areas in which anticipated regional measures will provide the bulk of the needed ozone reductions -- this will avoid burdensome new local planning requirements and restrictions on economic growth for these areas.

**FOCUS ON UTILITY EMISSIONS** -- EPA will work from a regional plan developed collectively by 37 states over the last two years to address the long-distance transport of ozone. This plan focuses on major power plants (which offer the most cost-effective opportunities for reducing pollution) to reduce nitrogen oxide, a key ingredient of smog. These reductions alone should be enough to allow most of the newly non-attainment counties to be able to comply with the new standard.

**DELIVER CLEAN AIR FASTER** -- By participating in the regional ozone reduction plan, counties that are not in compliance with the new standard will quickly achieve significant reductions in their ozone levels.

**ALLOW MORE TIME TO COMPLY** -- No county would have to comply fully with the new ozone standard by achieving local pollution controls until at least 2004, with no compliance determination required until at least 2007.

### **Implementing the Standard for Particulate Matter**

**ENSURE STRONG SCIENCE FOR IMPLEMENTATION** -- In order to ensure that implementation continues to reflect the best current science, EPA would complete another full scientific review of the health effects of fine particulates before any "non-attainment" designations would be made or local controls mandated.

**ALLOW TIME TO ESTABLISH PROGRAM** -- Because the new standard would regulate fine particulates for the first time, EPA will allow five years to build a nationwide monitoring network, and to gather and analyze the data needed to designate areas and develop implementation plans.

**PROVIDE A REASONABLE TIMETABLE FOR COMPLIANCE** -- Once it has the data, EPA would use its discretion under the Clean Air Act to allow another three years for areas that

aren't in compliance to submit air quality plans on how they'll meet the new standard, a **year-and-a-half** for review of these plans, and **several more years** for many areas to actually comply with the new standard. This will give business additional time to find the most cost-effective pollution controls.

**GIVE CREDIT FOR REDUCTIONS UNDER 1990 CLEAN AIR ACT** -- No areas will be designated as non-attainment if they will eventually meet the new particulate matter standard based on their reductions in sulfate emissions (which contain particulate matter) that are already required by the 1990 Clean Air Act acid rain provisions. These will take effect in the year 2000.

## UPDATED AIR QUALITY STANDARDS

EPA's recommended final standards for particulate matter and ozone (otherwise known as soot and smog) will be a major step forward in protecting the public from the health hazards of air pollution. These updated standards, the product of many years of intensive scientific review, move us toward fulfilling the Clean Air Act's goal of ensuring Americans that their air is safe to breathe. The new standards will provide new health protections to 125 million Americans, including 35 million children.

### Particulate Matter

*The standard for coarse particles remains essentially unchanged, while a new standard for fine particles will be set at an annual limit of 15 micrograms per cubic meter, with a 24-hour limit of 65 micrograms per cubic meter.*

- This is the first time ever that the government has set a public health standard for fine particle pollution.
- Scientists say that fine particles -- those measuring 2.5 micrometers in diameter and smaller -- are some of the most damaging to human health because they penetrate and remain in the deepest passages of the lungs.
- This new standard, as revised from EPA's original proposal, will provide new protections to nearly 70 million Americans, and will prevent approximately 15,000 premature deaths each year.
- By setting an annual limit of 15 micrograms per cubic meter, the new standard focuses on the most important issue -- controlling the amount of pollution and exposure to which Americans are subjected -- and therefore addresses the most significant health concerns.
- A more flexible 24-hour standard of 65 micrograms per cubic meter, revised from the original EPA proposal, will give greater flexibility to individual sources of pollution, while still ensuring that the health of the American people is protected.



## Ozone

For ozone, the recommended final standard will be updated from 0.12 parts per million of ozone measured over one hour to a standard of 0.08 parts per million measured over eight hours, with the average fourth highest concentration over a three-year period determining whether an area is out of compliance.

- This is the first time in 20 years that the ozone standard will be updated.
- The updated standard recognizes the current scientific view that exposure to ozone levels at and below the current standard causes significant adverse health effects in children and in healthy adults engaged in outdoor activities.
- The new 0.08 standard is much stronger and more protective than the old standard of 0.12. It will extend new health protections to 35 million people, bringing to 113 million the number of Americans protected by the air quality standard for ozone.
- For children, the new standard will reduce respiratory problems, such as asthma attacks. It will result in one million fewer incidences of decreased lung function in children each year.
- By moving from a one-hour to an eight-hour measurement, the standard will better reflect the real-world effects of ozone on human health.
- By focusing on concentration of ozone, the new standard will do more than merely designate high-pollution areas as out of compliance -- for the first time, it will also respond to health concerns based on how much an area is out of compliance.
- Using the fourth maximum, rather than the third (as originally proposed by EPA) will provide greater stability in the designation of areas, consistent with providing strong public health protections.