

**Fall line Air Quality Study
Coordinating Council Meeting Minutes
Columbus, Georgia
June 1, 2000, 10:00 AM**

Attending:

Jeff Carter – GA EPD
Michael Chang – Georgia Tech
Bill Price – Augusta Air Quality Task Force
George Carellas – DoD
Chris Simons – GDOT
Eric Meyer – GRTA
Bob Fountain – Bibb County Engineer
Scott Martin – US EPA Region IV
Kay Prince – US EPA Region IV
Karen Borel – US EPA Region IV
Brenda Johnson – US EPA Region IV
Billy G. Turner – Columbus Water Works
Vernon Ryle – Bibb County
Art Cleveland – Columbus State University
Polly Gustafson – Fort Benning
George Lee – Georgia Tech / EDI – Macon
Charles Brooks – Bibb County Engineering Office
Donna Duke – Bibb County Engineering Office
Lisa Collins – Columbus Chamber of Commerce
Mike Gaymon – Columbus Chamber of Commerce
John J. Jansen – Southern Company
John Hoertz – Air Force
Paul Nagle – Macon Chamber of Commerce

Attending by teleconference:

Ed Engbert – DoD
Elliot Price – Georgia Tech / EDI – Augusta
Paul Mullins – GDOT
Mark Summers – Robins AFB
Renee Shealy – SC DHEC
ADEM

The meeting was called to order at 10 AM and presided over by Jeff Carter, EPD. The meeting agenda was announced:

- 1) Policy Statement Introduced
- 2) EPD / Georgia Tech contract
- 3) Nonattainment designations
- 4) Policy Statement Discussed
- 5) Update on FAQs
- 6) New Business / Schedule Next meeting
- 7) Adjourn

- 1) Policy Statement Introduced. Mr. Carter provided copies of a draft policy statement that describes the purpose and general policies of the Coordinating Council and Science Advisory Panel for the FAQs. Further discussion on this policy statement was tabled until later in the meeting.
- 2) EPD / Georgia Tech contract status. Mr. Carter announced that a final contract describing the scope of services that Georgia Tech will perform over the next three years has been negotiated and signed by Georgia Tech. It is in the process of being finalized by EPD at this moment and may be completed as early as today or tomorrow. Carter and Chang emphasized that, while the contract outlines the full three years of the study based on the original proposal, this first contract only commits the first \$375,000. The rest is contingent on funding. This also means that as new funds are made available, the contract will be re-opened and any changes that the Council wishes to make to the scope of services can be accomplished at that time. A request was made for EPD to distribute copies of the contract. EPD agreed to promptly provide electronic copies via the listserv.
- 3) 8-hour Ozone Standard Nonattainment Designations. Carter described and provided copies of a memorandum that identifies the factors that are being considered and the recommended criteria for determining the nonattainment status under the proposed 8-hour ozone standard. He also provided output from a spreadsheet containing values for all the factors in each county under consideration. In determining nonattainment status, a county with a monitor in it that is not meeting the current standard will be designated nonattainment. For counties surrounding those with a nonattaining monitor, but without a monitor of their own, Carter explained that for each of the remaining 7 factors, each county is compared against a threshold value and if the county meets or exceeds the threshold value in 5 of the 7 categories, then it too likely will be declared nonattainment. The thresholds were selected based on comparable information from Paulding County, GA – the county with a monitor that has the lowest design value that does not attain the proposed 8-hour ozone standard.

Based on these, at this time EPD is recommending that in the Augusta metropolitan area, *Richmond and Columbia counties are to be designated nonattainment*; in the Macon metropolitan area, *Bibb and Houston counties are to be designated nonattainment*; and in the Columbus metropolitan area, only *Muscogee county is to be designated nonattainment*. This the recommendation that EPD will likely provide to the Governor.

Q: Is SC and AL also following this process? What is being done in these states concerning those counties that are in Augusta's and Columbus' MSAs but are not in Georgia?

A: Carter responds that GA cannot make a recommendation for another state though it is expected that these other states are following a similar process and EPD will coordinate with these other states after June 30.

Q: One concern mentioned last time was that EPD wanted to make sure that the nonattainment area was big enough to ensure that it has sufficient authority to

regulate those sources that affect air quality in the area. Are the areas that have been defined sufficiently large enough?

A: Carter responds that for large stationary sources, even if they are not in the nonattainment area, they can be regulated under the existing permitting program of the EPD. An additional criterion that EPD also considered qualitatively in its decision for each county, was the number of significant future, “non-exempt” transportation projects for each area. This may be particularly important for meeting conformity.

Q: Is it possible to designate partial counties instead of whole counties?

A: Carter responded that it is typically not done because of the difficulties in developing emissions budgets and due to the potential for “hard to justify” inequities within a county (e.g. a business on one side of a road may be subject to control but another on the other side of the road may not). Prince added that it is EPA’s position that whole counties should be designated. In the past, EPA has allowed partial counties to be designated, but these have caused problems similar to what Carter described.

Comment on the criteria: Simon (GDOT) recommended that EPD use % urban land mass or area in each county instead of % urban population since for some of these small counties, a sizable fraction of the population may reside in an urbanized area, but the urbanized area itself could be very small relative to the total area of the county (which is mostly rural).

Simon also recommends that % population growth be changed to absolute population growth since this indicator can be skewed for counties with small populations to begin with.

Q: Has EPD evaluated these criteria for the 1-hour standard?

A: Carter says no. This designation analysis is only for the 8-hour standard. Prince added that because the Court did not “vacate” the 8-hour standard, it is still in place and EPA is proceeding with designating areas. Under the Clean Air Act, EPA is supposed to designate nonattainment areas by July 17 and by not doing so, could be subject to being sued. EPA however, does not expect to formally designate areas for the 8-hour standard before December 2000, and does not intend to begin enforcing nonattainment related requirements until after the Supreme Court ruling in 2001.

Q: How was the 8-hour ozone standard determined?

A: Prince replied that EPA is required by the Clean Air Act to review air quality standards every five years. In 1997, the EPA concluded that the existing 1-hour standard was not sufficient to adequately protect public health and they promulgated the 8-hour standard. This new standard however, has been challenged in court and in May of 1999 in the *American Trucking* case, the Court of Appeals upheld EPA’s authority to revise the standard, but questioned its process of determining an appropriate standard. The case will now be heard by the

Supreme Court, which last week ruled that it will also hear arguments concerning the relative costs of implementing the 8-hour standard.

Q: What would happen if the standard is changed to something else, for example 0.09 ppmv?

A: Prince and Carter respond that EPA and EPD will review the most recent data and revise appropriately. Until such time however, the areas designated under the 8-hour standard will be required to comply with all relevant measures.

Q: Why are regions being penalized on the transportation side if the 8-hour standard cannot be enforced?

A: Prince states that they are not. It is EPA's preference to wait until the court rulings are complete before they begin enforcing any action such as conformity.

Q: What is the basis for the VOC and NOx emissions densities used in the EPD analysis?

A: Carter responds that the data is only for point sources and is drawn from the EPA AIRS database on source permits.

Q: What if the FAQs reveals new emissions information that changes the results of EPD's analysis? Is there anyway to change the designation?

A: Prince replies that generally once an area is designated nonattainment, unless there is a blatant technical error in the original analysis, a county is not likely to be redesignated based only on new information. Carter added that the FAQs is not likely to reveal significantly different point source emissions. Further, since 3 of the 5 counties that EPD is proposing to designate as nonattainment have a monitor that shows the area is not meeting the standard, this discussion is really only for the remaining two counties (Houston and Columbia). But these two counties meet or exceed the threshold in all the other categories so they would still meet the qualifications for being included in the nonattainment areas even if their point source emissions were found to be zero.

Q: Has EPA made any determination on designating new 1-hour ozone nonattainment areas?

A: Prince replies that EPA does not have any plans to do that at this time.

Q: A study contracted by Columbus shows that Columbus is only responsible for about 4 ppbv of the total ozone in the Columbus area. Why then, should Columbus be designated nonattainment when it cannot do anything to control ozone concentrations in the area?

A: Carter replied that EPD is not familiar with the study and would have to review the study before it could make any statement concerning it. However, the law is specific that if a monitor in a county is showing that the air does not meet the standard, then the county must be designated nonattainment regardless of where the pollution originates. If the nonattainment is due to an upwind source, the SIP process allows EPA and EPD to address these sources as needed. Prince

added that this was the subject of the Ozone Transport Assessment Group (OTAG) study and that there is an awareness of the pollutant transport issue in this regard.

Q: Can EPA explain the NO_x SIP call?

A: Prince states that of 37 states studies in OTAG, 22 were found to significantly contribute to downwind nonattainment areas. EPA then set out to develop a strategy to reduce regional ozone concentrations. EPA looked at the effectiveness and cost of controls (anything less than \$2000 per ton of NO_x removed was deemed reasonable) and compiled these measures in what is now known as the “NO_x SIP Call.” The NO_x SIP Call specifies NO_x budgets for each of the 22 states, but allows the individual states to determine the best approach to meet their budgets. The NO_x SIP Call has been challenged in court, but its mandates have been upheld.

Comments from EPA (Prince): Conformity will only apply upon the “effective date” of the nonattainment designation (likely after the Supreme Court ruling). A SIP should be submitted no later than 3 years after designation. EPA plans to be in a position to formally designate areas any time after December 2000. When designations are announced, they will clearly specify that these are for the 8-hour standard.

Q: What is the process for being redesignated as an attainment area?

A: Carter and Prince reply that an approved SIP must be developed and implemented and all monitors in the area must show 3 years of data that meet the standard.

The group requested that EPA keep them posted on when an “enforcement date” might be forthcoming.

- 4) Policy Statement Discussed. Simon (GDOT) suggested that the Policy Statement include a statement on the purpose of the FAQs itself. Carter agreed and will add such statement. A question also arose about membership on the Science Advisory Panel. Chang replied that this panel is open to anyone that desires to learn more about the technical aspects of the study, but will be dominated by experts in the areas of monitoring, emissions inventories, and air quality modeling. He also suggested that this is a good place for all stakeholders to be represented to ensure that we all agree on the methods and processes used to develop the results and to gain better insight into the interpretation of those results.
- 5) Update on FAQs. Chang provided a schedule for the next three months detailing where and what the science team will be doing and the deliverables they will be providing. He also described the three “open houses” that will be available during the pilot studies in each city. The open house is a time when any and all stakeholders may come visit the mobile air quality laboratory, tour the site, and speak directly with the science team. While the open house can accommodate some inquiries from the

general public, the event is geared more towards providing access for the active participants in the study (i.e. all of you), the key leaders in each community for which continued support is vital (e.g. from business and industry, county and municipal government, state and federal legislators, etc...), and the media. We will need local help in coordinating this event and getting invitations out.

- 6) New Business / Next Meeting Schedule. Hearing no new business, it was decided that the next meeting of the FAQs Coordinating Council will be held in Augusta, Georgia (after which all succeeding meetings will be held in Atlanta) on August 31, 2000 at 10 AM at a location to be determined.
- 7) The meeting was adjourned at ~12:30PM and all attendees enjoyed a wonderful lunch, graciously provided by our host, Mr. Billy Turner and the Columbus Water Works.