





Virginia Air Quality and Planning Issues

CIBO Conference

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Agenda

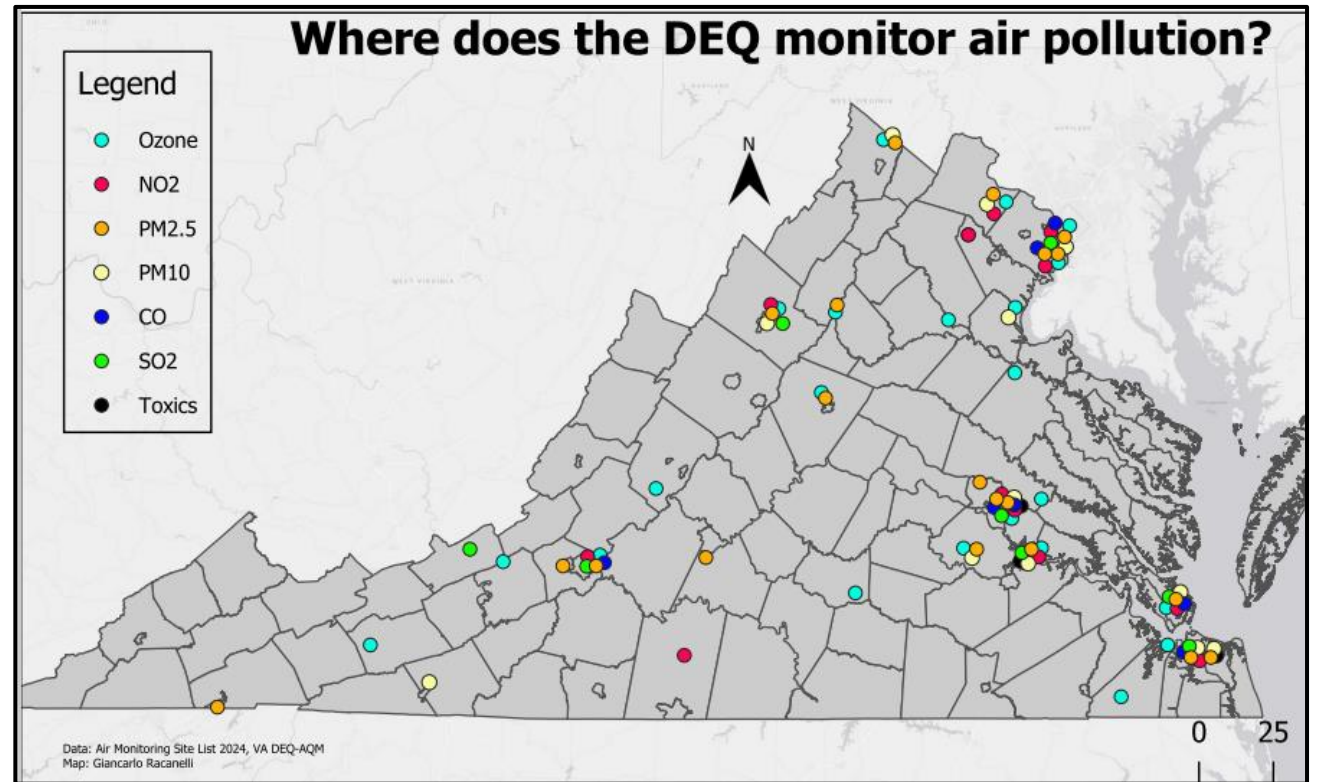
- Overview of air quality monitoring data in Virginia
- Wildfire impacts
- Emission trends
- Virginia's permitting program
- Air quality planning topics
 - Ozone (O₃)
 - Sulfur dioxide (SO₂)
 - Fine particulate (PM_{2.5}) – 2024 PM_{2.5} National Ambient Air Quality Standards (NAAQS)
 - Regional haze program
- Future NAAQS and new or upcoming rulemakings
- Questions/discussion



Virginia's Air Quality Data and Trends

Virginia's Air Quality Monitoring Network

- 100 instruments at 34 monitoring sites
 - Criteria pollutants: SO₂, O₃, CO, NO₂, lead, PM*
 - PM_{2.5} Speciation Monitor – Henrico County
 - Air toxics
 - Five monitoring sites for acid rain precipitation (National Acid Deposition Program)
- Nearly all instruments are federally required
- [Tidewater Air Monitoring Evaluation Project](#) (TAME) is studying health risks from coal storage and transport facilities
- Three federal Clean Air Status and Trends Network (CASTNET) ozone monitors: Prince Edward County, Giles County, Shenandoah National Park
- Two federal Interagency Monitoring of Protected Visual Environment (IMPROVE) sites for measurements of visibility range: James River Face Wilderness Area, Shenandoah National Park
- Data summaries published annually; [Near real-time data](#) available

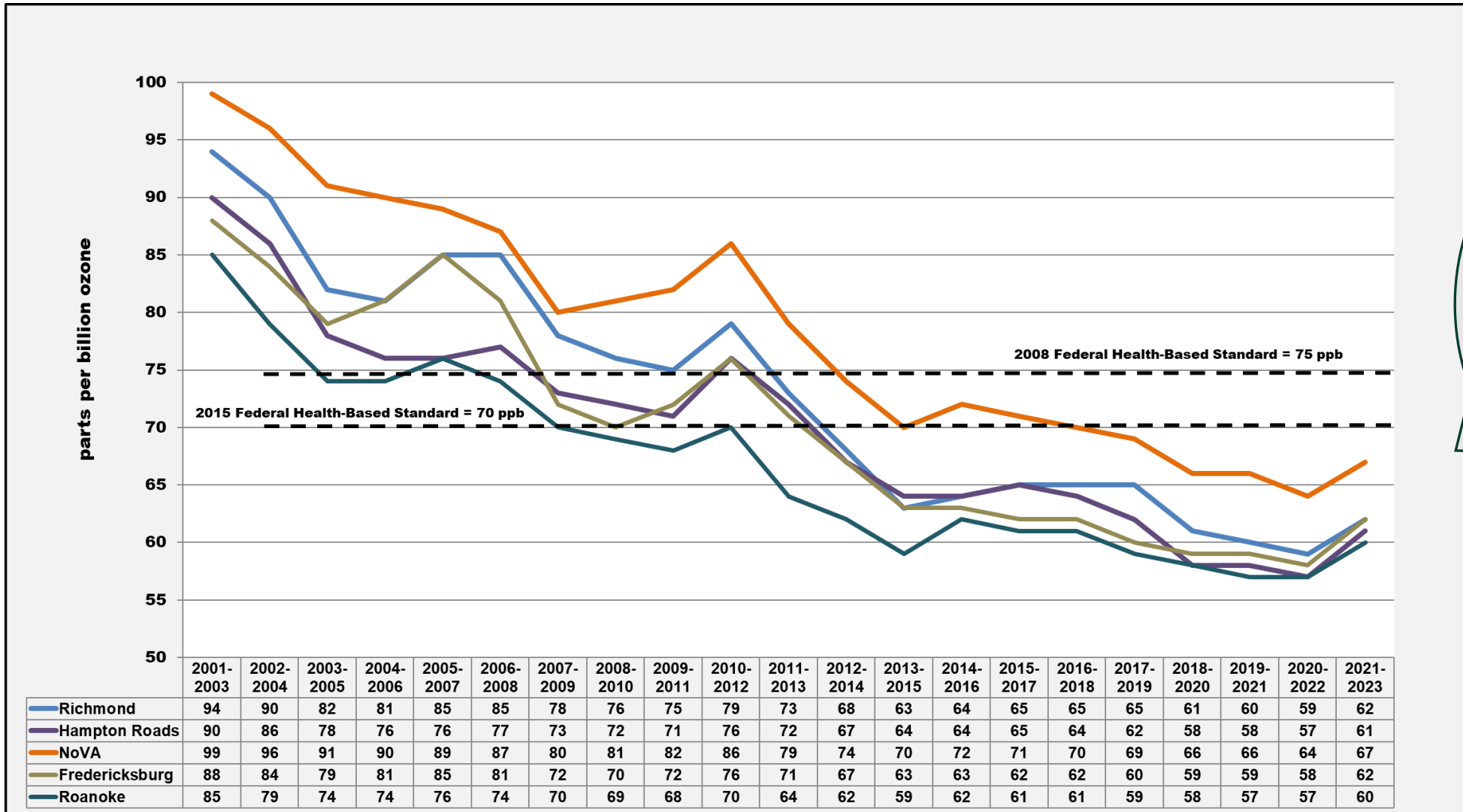


How Are Monitoring Data Used?

- NAAQS compliance
- NAAQS designations and classifications
- Air quality forecasting
- Permitting
- Risk-based modeling
- Trends analyses
- Information requests
- Special studies

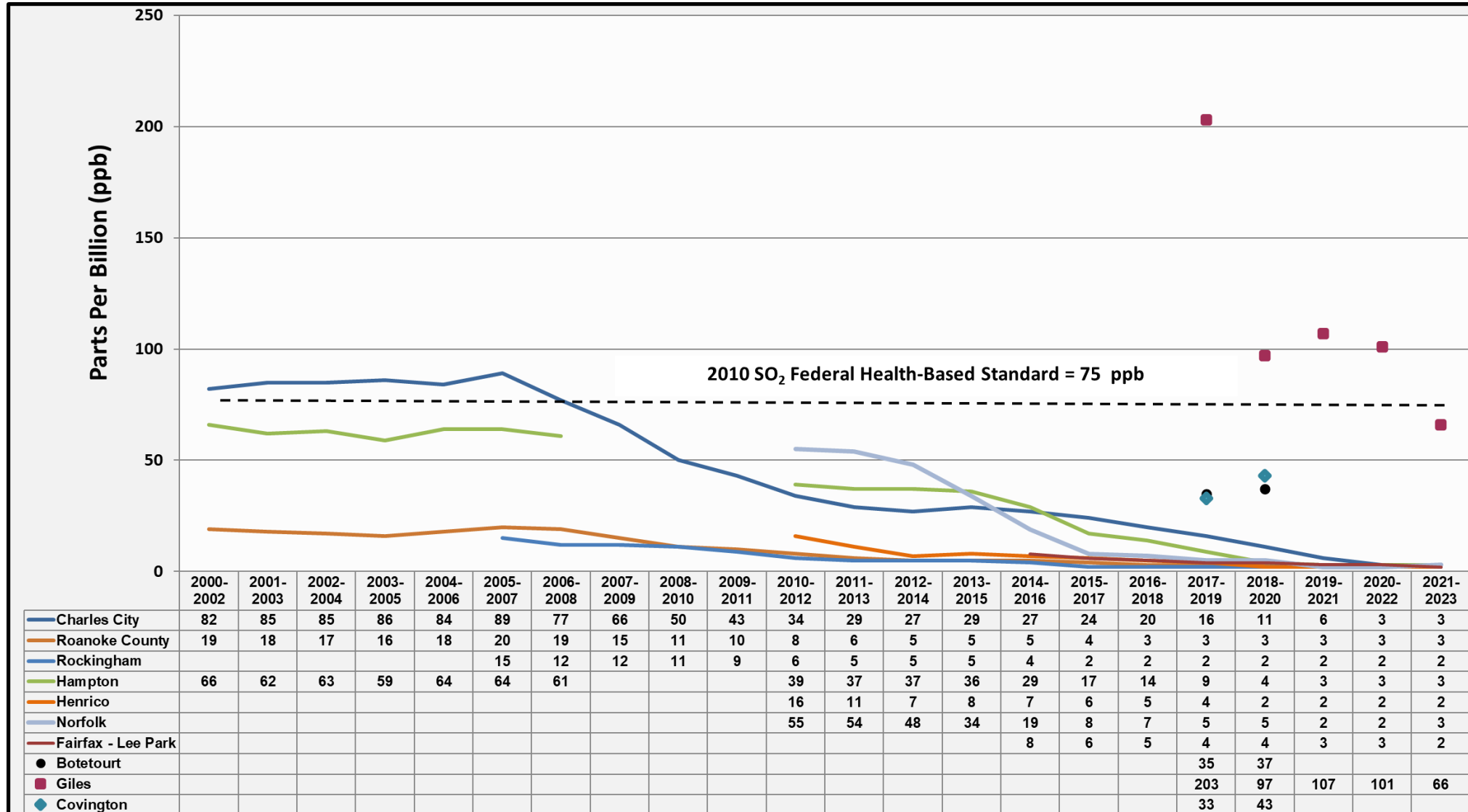
Air Quality Index (0-500)	Levels of Health Concern	Meaning
(0-50)	Good	Air quality is considered satisfactory, and air pollution poses little or no risk.
(51-100)	Moderate	Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution.
(101-150)	Unhealthy for Sensitive Groups	Members of sensitive groups may experience health effects. The general public is not likely to be affected.
(151-200)	Unhealthy	Everyone may begin to experience health effects; members of sensitive groups may experience more serious health effects.
(201-300)	Very Unhealthy	Health warnings of emergency conditions. The entire population is more likely to be affected.
(301-500)	Hazardous	Health alert: everyone may experience more serious health effects.

Virginia's Air Quality Trends – Ozone, parts per billion (ppb)



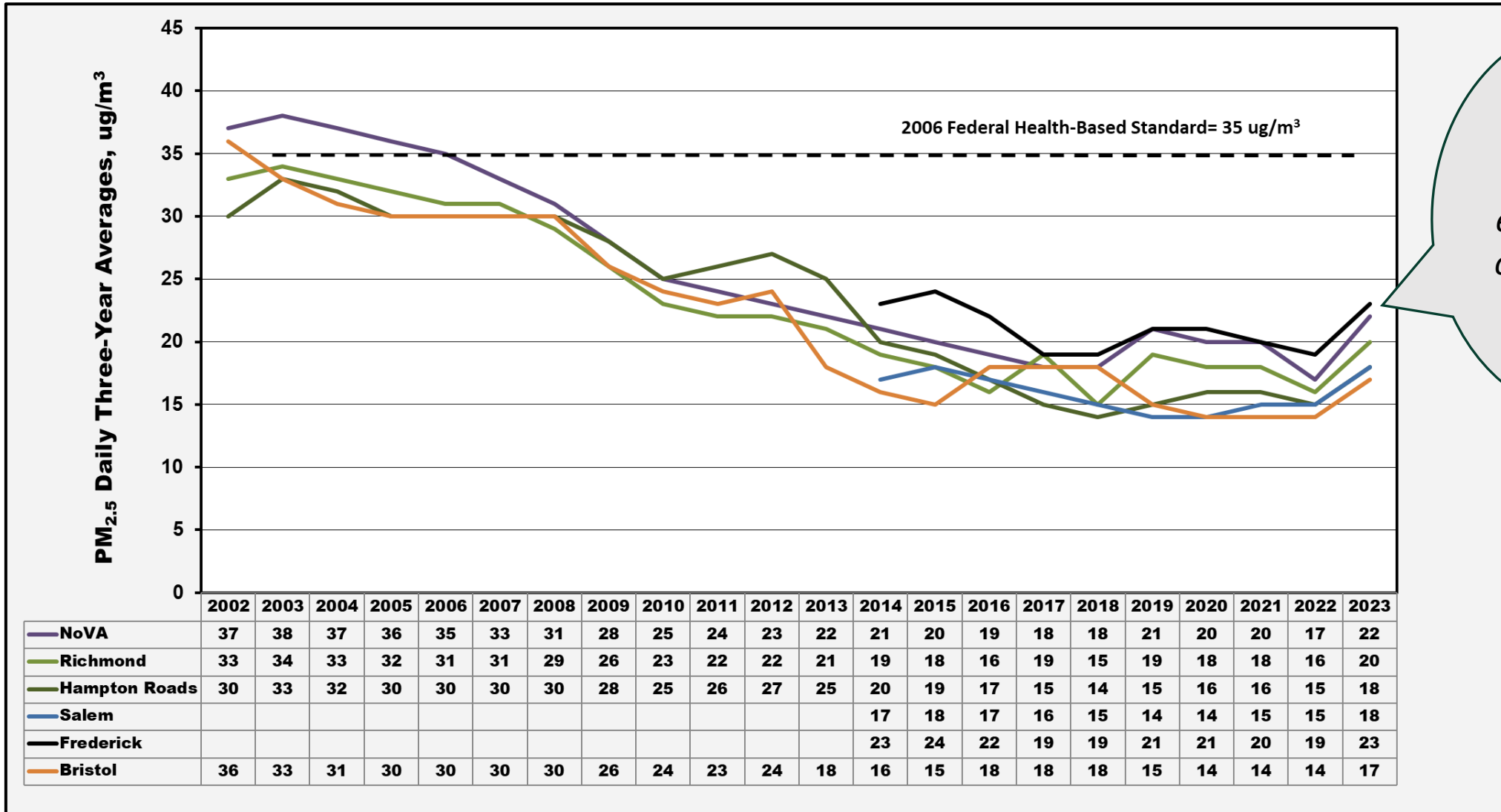
Uptick in 2023 due to effects of out-of-state forest fires

Virginia's Air Quality Trends – SO₂ (ppb)



**2018-2020 SO₂ data for Botetourt and Covington contain partial year values for 2020. Federal regulations allowed those monitors to be removed mid-2020.*

Virginia's Air Quality Trends – Daily PM_{2.5}



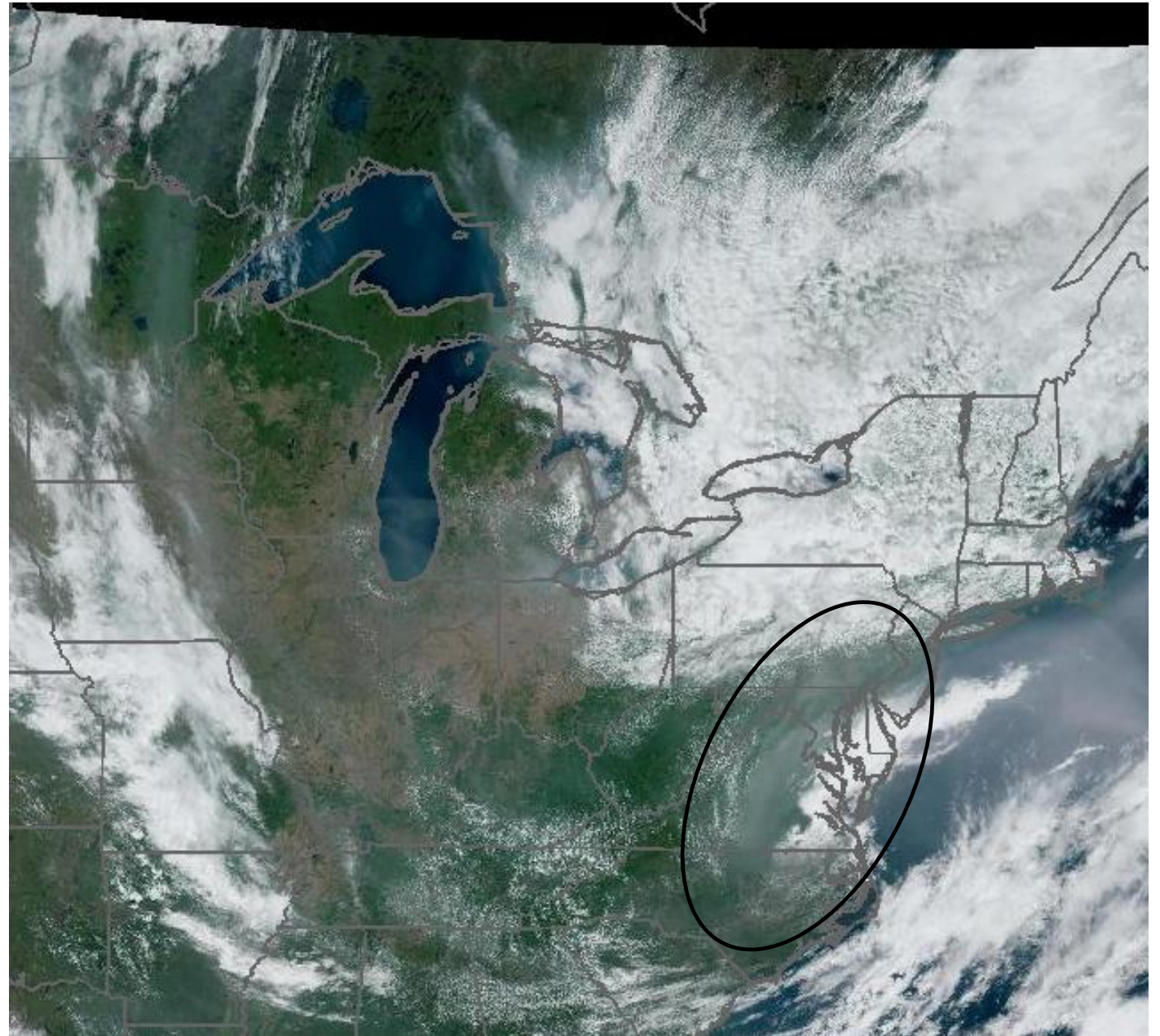
Uptick in 2023 due to effects of out-of-state forest fires



Impacts of 2023 Wildfires on Virginia Air Quality

Wildfire Smoke Impacts

- Wildfire smoke can impact PM and O₃
- Canadian wildfires had ***highly unusual*** impacts on Virginia in 2023, especially on PM_{2.5}

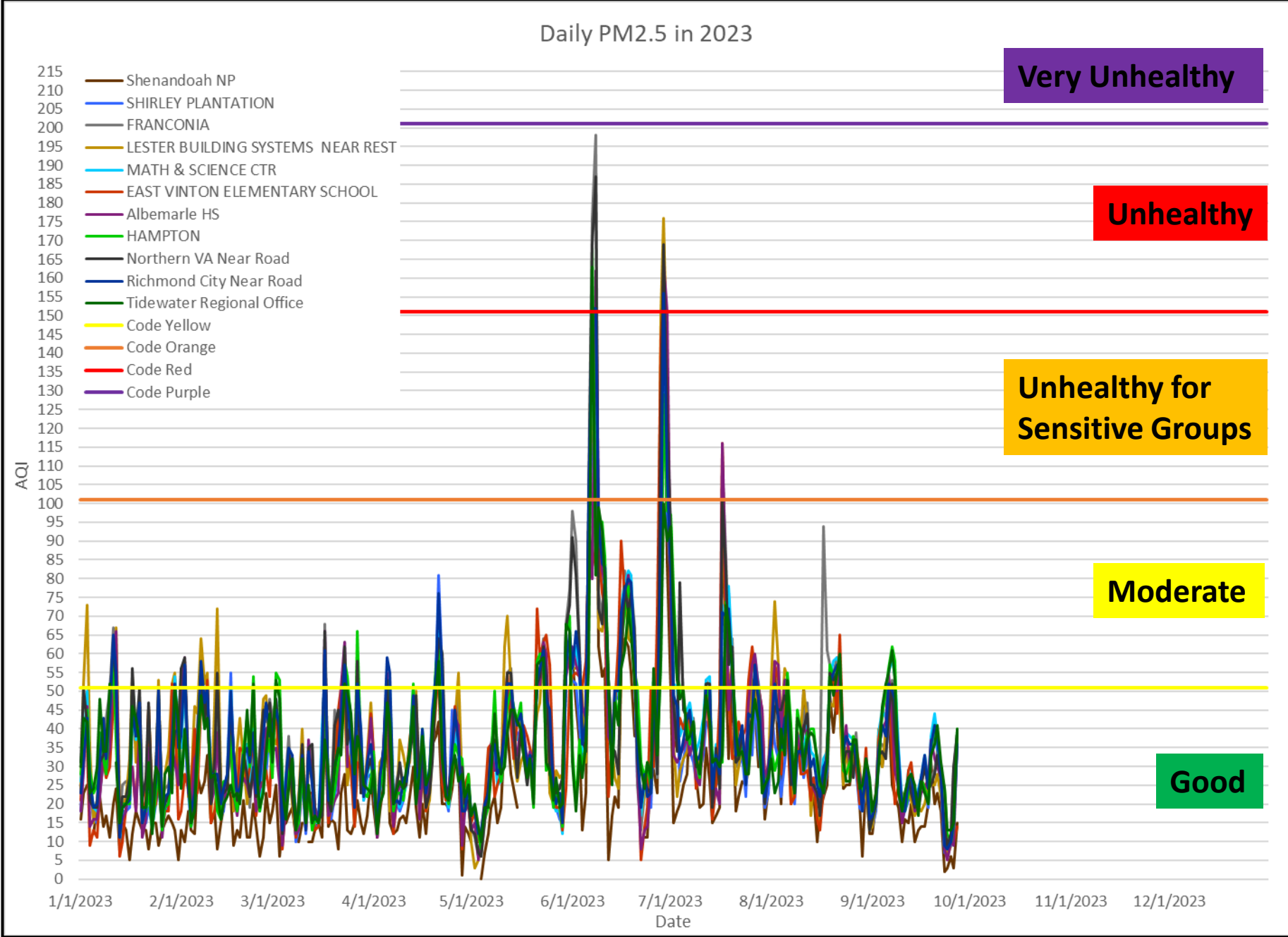


Satellite image from June 8, 2023

How Unusual is 2023 PM_{2.5}?

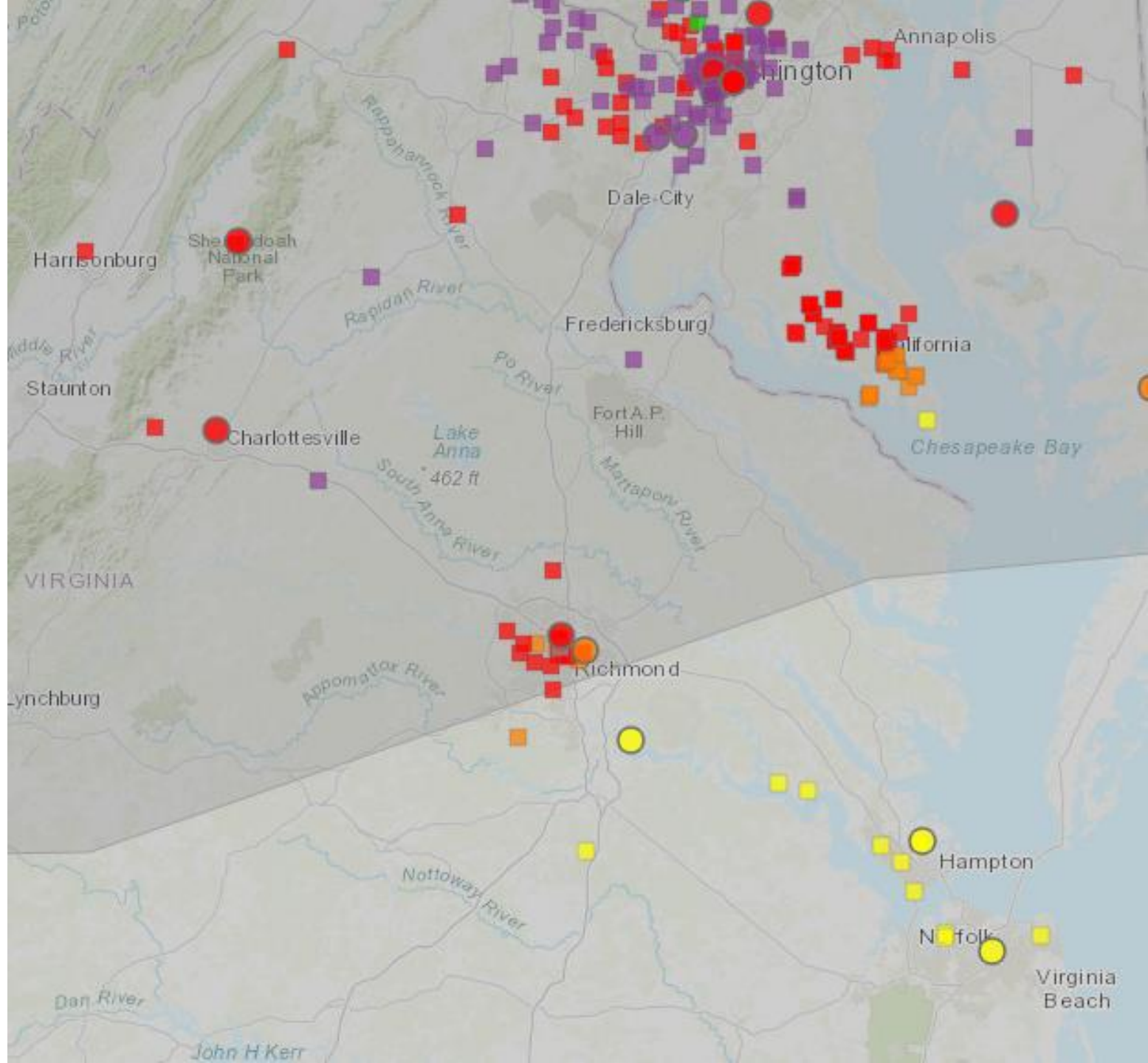
Poor PM_{2.5} Days by Year

Year	Days
2019	0
2020	0
2021	2
2022	0
2023	7



AirNow Fire and Smoke Map – June 8, 2023

- Circles: official monitors
- Squares: air sensors purchased and owned by citizens (Purple Air)
- Layers of grey show satellite observed smoke plumes
- DEQ issued air quality alert for metro areas based on the worst conditions observed by official monitors
 - Richmond - Code Red
 - Northern VA - Code Purple



Wildfire Consequences

- Poor air quality even after implementation of unprecedented numbers of industrial and other control programs
- Affects permitting and transportation conformity by increasing background concentrations for air quality modeling and for hot spot analyses
- Impacts air quality monitoring networks such that additional monitoring sites may be federally required. Monitoring sites are costly.
- State must create exceptional events flag demonstrations
 - Only very limited amounts of data are currently being considered by EPA for exceptional event flag approvals.
 - Short turn-around times for states to submit exceptional event demonstrations for 2015 ozone and 2024 PM_{2.5} NAAQS compliance



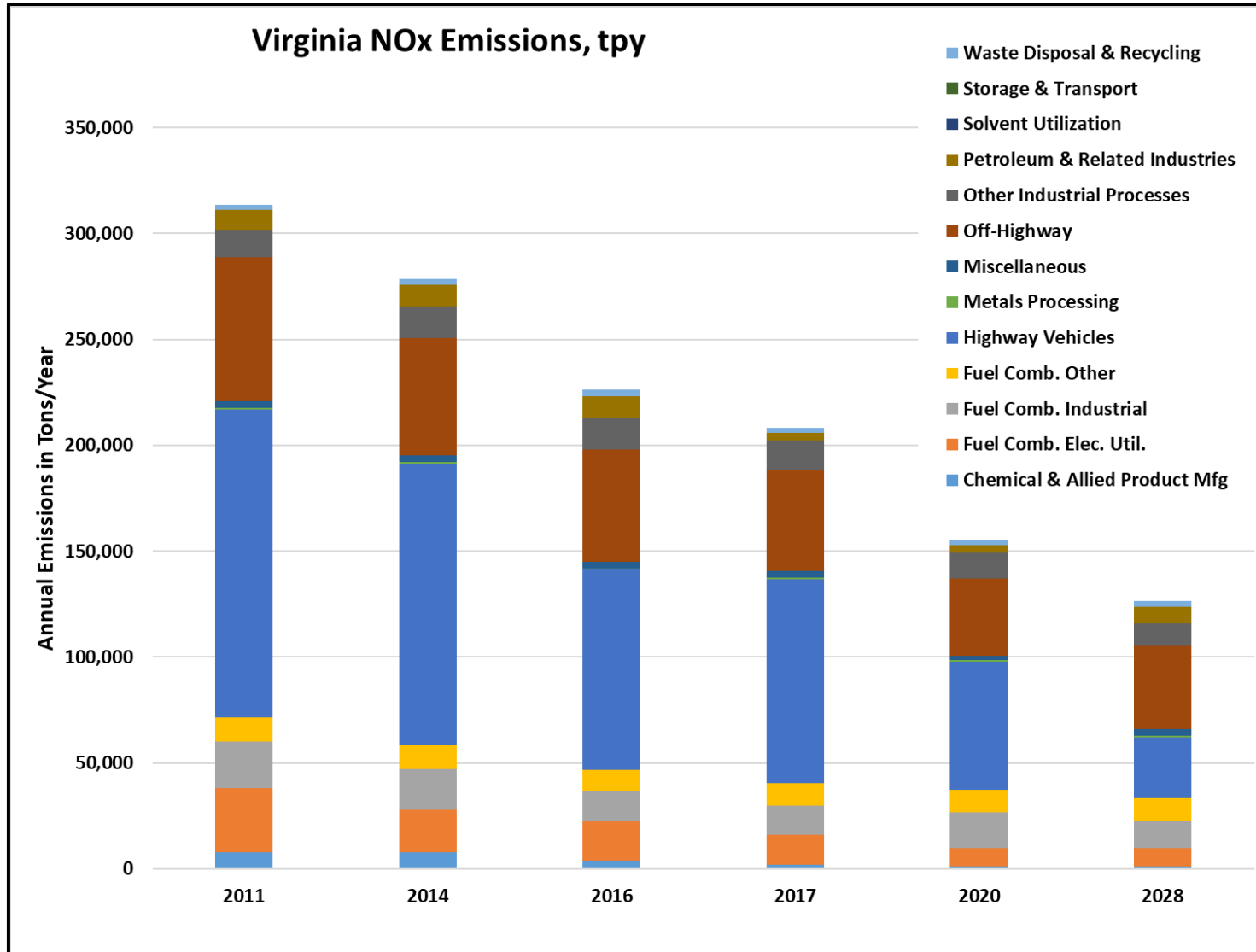
Figure 9a. June 2023 Quebec Wildfire. Image showing wildfire and associated smoke at Lebel-sur-Quevillon in Quebec, Canada, on June 23, 2023. One of over 100 fires burning across the Quebec province at the time. <https://www.cnn.com/2023/08/22/americas/canada-wildfires-climate-change-quebec/index.html>

Year	# of Canadian Hotspots	Area Burned
2019	66,000	7,300 m ²
2020	12,000	669 m ²
2021	154,000	15,200 m ² (larger than MD)
2022	49,000	5,600 m ²
2023 (thru Oct)	560,000+	>69,300 m ² (larger than GA)



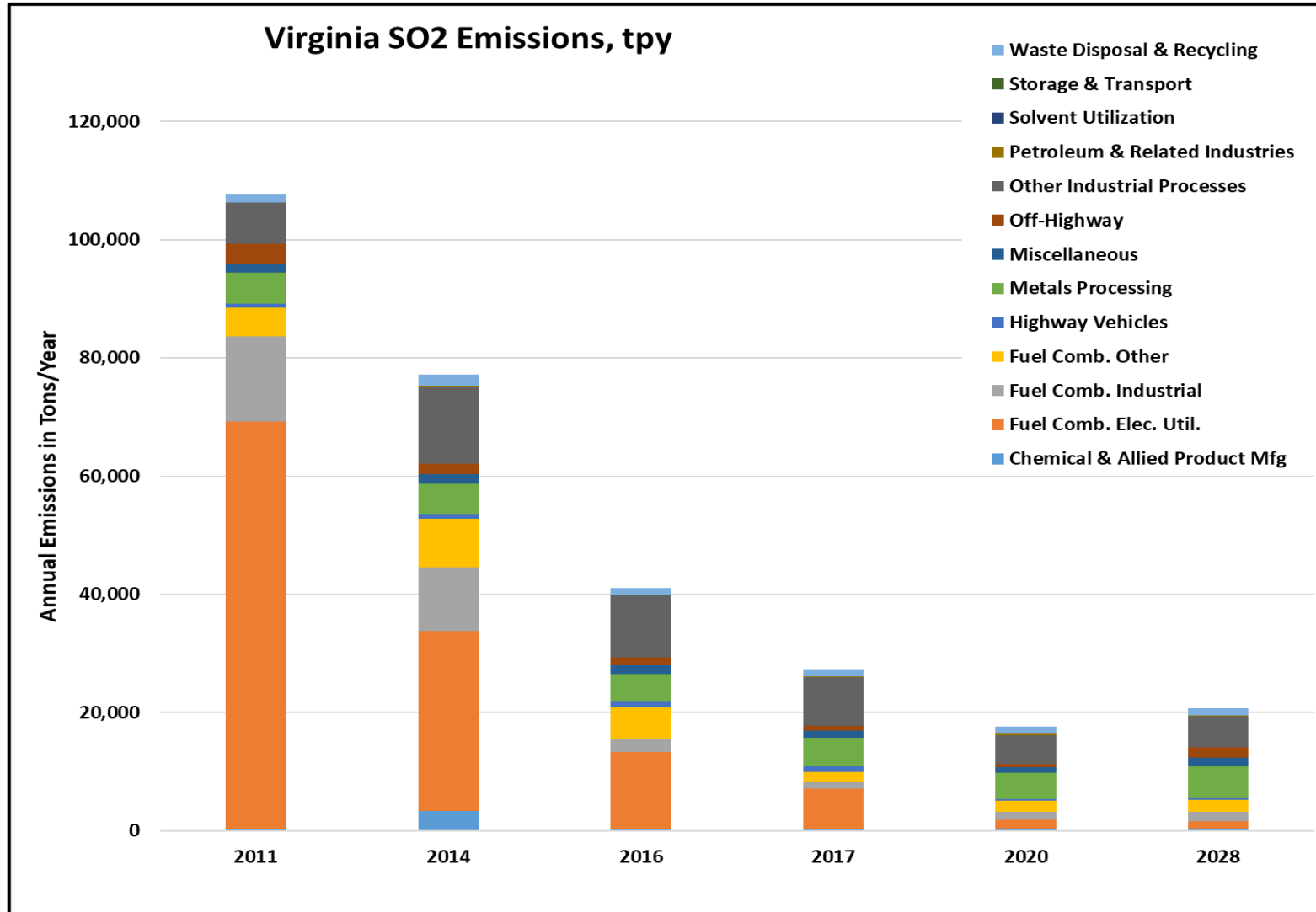
Virginia Air Pollution Emissions Data, Projection, and Trends

Lower Emissions = Better Air Quality



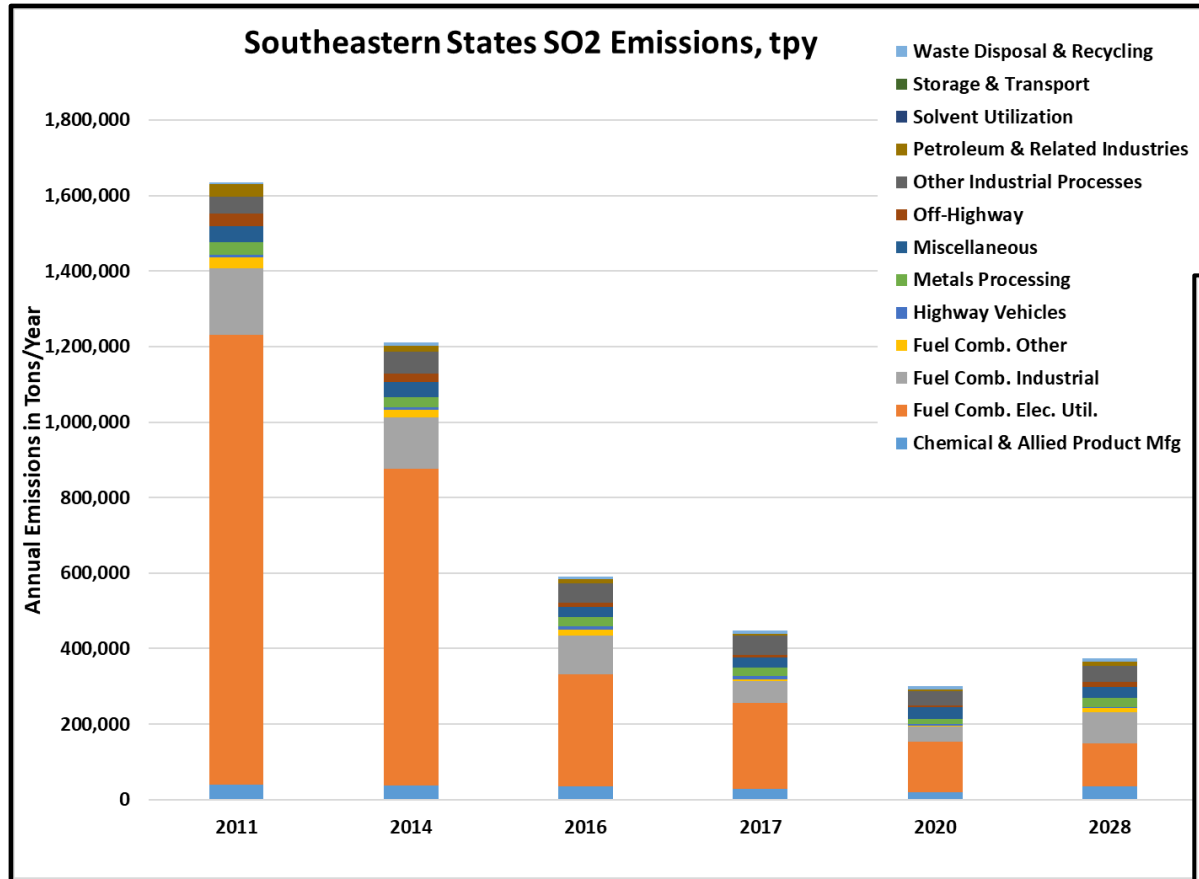
- Actual emissions of nitrogen oxides (NOx) dropped about 158,000 tons between 2011 and 2020
- Off-road emissions expected to be 31% of total VA NOx emissions in 2028
- Industrial fuel combustion emissions were 7% of total VA NOx emissions in 2011 and about 11% of total VA NOx emissions in 2020.
- ***2020 NOx emissions are depressed due to effects of the pandemic. Passenger vehicle miles traveled and commercial aviation were much lower than normal due to the economy-wide shutdown, reducing NOx.***
- Industrial fuel combustion emissions expected to be 10% of total VA NOx emissions in 2028.

Lower Emissions = Better Air Quality

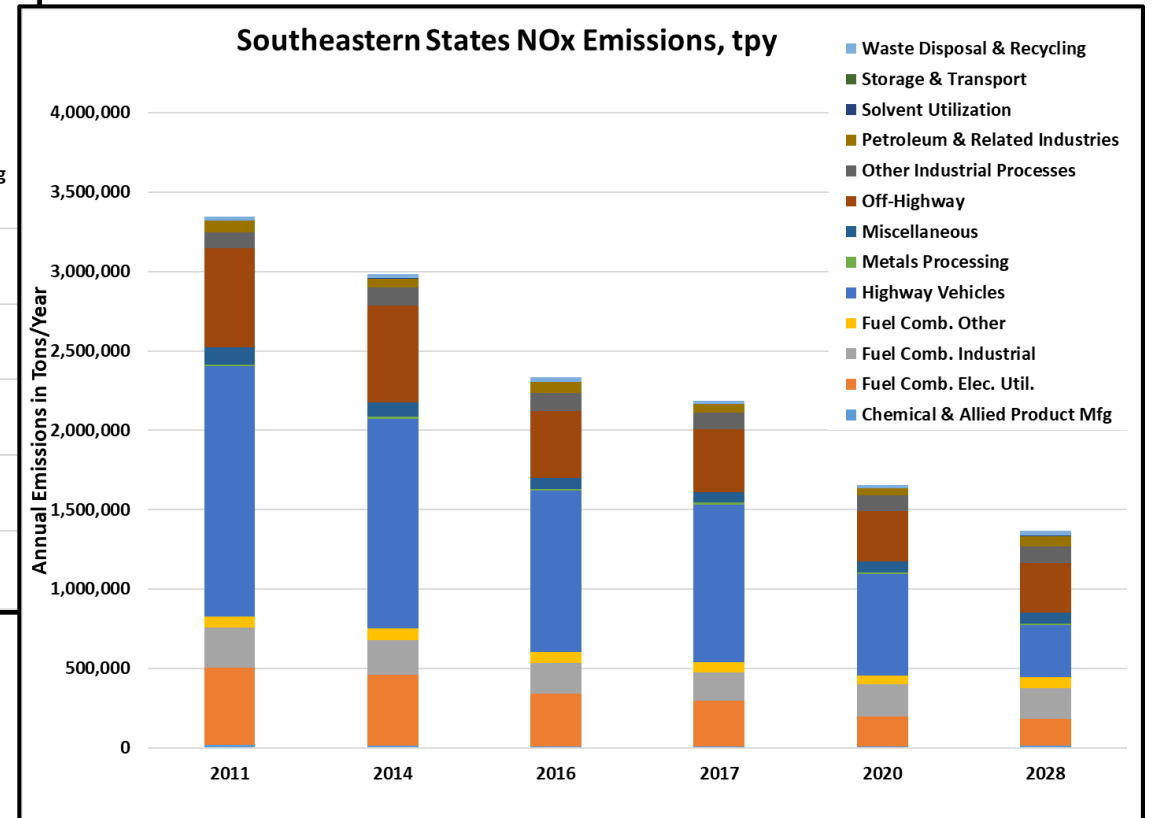


- Actual emissions of SO₂ dropped about 90,000 tons between 2011 and 2020.
- Emissions from electricity generation and industrial combustion account for most of the reductions.
- ***Impacts of the pandemic on 2020 SO₂ emissions are uncertain.***
- In 2028, metals processing and industrial processes are expected to account for just over 50% of VA SO₂ emissions.

Lower Emissions = Better Air Quality



All southeastern states experienced similar trends and have similar projections.



Southeastern states: AL, FL, GA, KY, MS, NC, SC, TN, VA, and WV.



Virginia's Air Permitting Program

Virginia's Air Permitting Program Overview

Permit Type	# of Regulated Facilities
Title V Major Sources	210
Synthetic Minor Sources	1,392
Minor Sources	2,196
Total	3,798

- *Source: Virginia's Comprehensive Environmental Data System as of 05/07/2024*
- *Totals do not include planned or sources under construction*

- **Preconstruction Review Programs**
 - Minor New Source Review
 - State Major New Source Review
 - Prevention of Significant Deterioration
 - Nonattainment
 - Major Hazardous Air Pollutant New Source Review
- **Operating Permit Programs**
 - Title V/Title IV Permits
 - State Operating Permits

Virginia DEQ Air Permitting Activity

07/01/2022-06/30/2023

- DEQ processes \approx 350-450 air permit actions annually
- DEQ issues \approx 15 - 30 exemptions annually
- Air rules comprise between 275-300 regulations
- DEQ staff consists of:
 - 42 permit writers
 - Six (6) permit managers
 - Eight (8) Office of Air Permit Programs staff
 - Three (3) current vacancies (7%)

Permit Type	Quantity Issued in 2023
New Source Review (NSR) Exemptions	15
Minor NSR Permits	278
State Major NSR Permits	0
Major NSR Permits	1
General Permits	2
State Operating Permits	19
Title V Operating Permits	52
Title IV Operating Permits	2
Total	369

DEQ's Permitting Enhancement and Evaluation Platform (PEEP)

- [PEEP](#) provides the public with current information about the critical steps and permitting schedules needed for permit approval.
- Provides information on individual permitting applications as well as DEQ's overall performance.

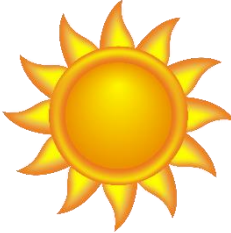
The screenshot shows the DEQ Permitting Enhancement and Evaluation Platform (PEEP) search interface. At the top, there is a navigation bar with "Home / Search". Below this is the title "DEQ Permitting Enhancement and Evaluation Platform". A welcome message states: "Welcome to DEQ's Permitting Enhancement and Evaluation Platform (PEEP). This online resource conveys and tracks critical steps and target timeframes for permit applications and other requests for DEQ approval. The goal is to foster transparency, collaboration and efficiency in DEQ's evaluation processes." Below the welcome message, there is a link to "DEQ's PEEP Information Page" and a note: "Please visit DEQ's PEEP Information Page for a list of permits and approvals currently tracked in PEEP, and the schedule for adding future programs to PEEP." A search instruction follows: "Use the search tool below to find out more information about pending DEQ approval actions." The main section is titled "Request Search" with an information icon. Below this is a "Filters & Legends" section with a grid of dropdown menus: Media (All), Program Type (All), Request Type (All), Facility Name (All), Locality (All), Requestor (All), Request Status (In-Progress), Request Number (All), and Agent (All). There is a "Reset" button and a legend for "In-Progress" with a blue square.

<https://portal.deq.virginia.gov/peep-search>



Air Quality Planning Ozone

What is Ozone?

- Formation: VOC + NO_x +  = Ozone

(Volatile organic compounds and nitrogen oxides in the presence of sunlight will form ozone.)

- Primary component of smog
- Mainly a summertime (April through October) pollutant
- Impacts human lung function and health as well as vegetation
- Heavily regulated by the Clean Air Act

Federal Ozone Air Quality Standards

- **1979 Standard**

- 0.12 ppm
- Averaged over one hour

- **1997 Standard**

- 0.08 ppm
- Averaged over eight hours

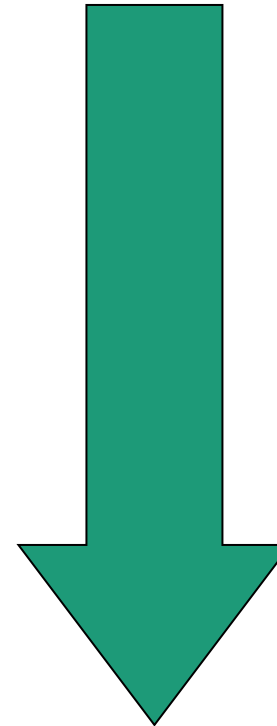
- **2008 Standard**

- 0.075 ppm
- Averaged over eight hours

- **2015 Standard**

- 0.070 ppm
- Averaged over eight hours

*LESS
STRINGENT*



*MORE
STRINGENT*

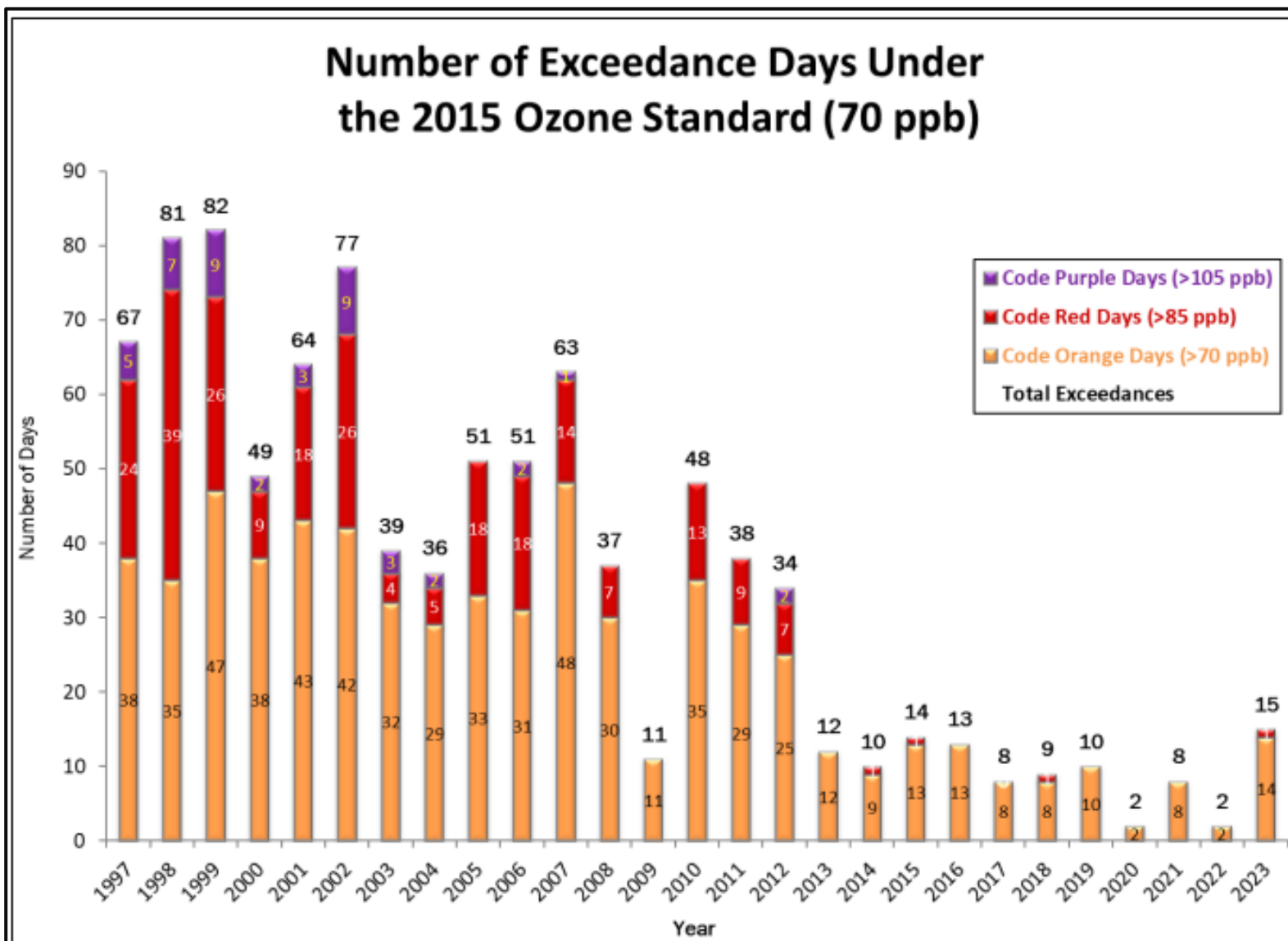
On August 21, 2023, [EPA released plans](#) to initiate a full review of the 2015 ozone NAAQS rather than to reconsider the 2020 decision to retain the 2015 ozone NAAQS.

Metropolitan Washington, D.C. 2015 Ozone NAAQS Moderate Nonattainment Area

- Tri-state nonattainment area:
 - More than 5,800,000 people
 - District of Columbia, southern Maryland, northern Virginia
- All planning performed as part of tri-state §174(a) local planning organization - Metropolitan Washington Air Quality Committee
- Historic, persistent ozone problems
- Moderate bump up published Oct 7, 2022 ([87 FR 60897](#))
- Current data shows compliance after approval of an exceptional events demonstration submitted by DC
- DC, MD, and VA are working on a redesignation request
- VA must also submit a reasonably available control technology evaluation and several Inspection and Maintenance program state implementation plan (SIP) revisions



Metro DC Ozone Exceedance Day Trend



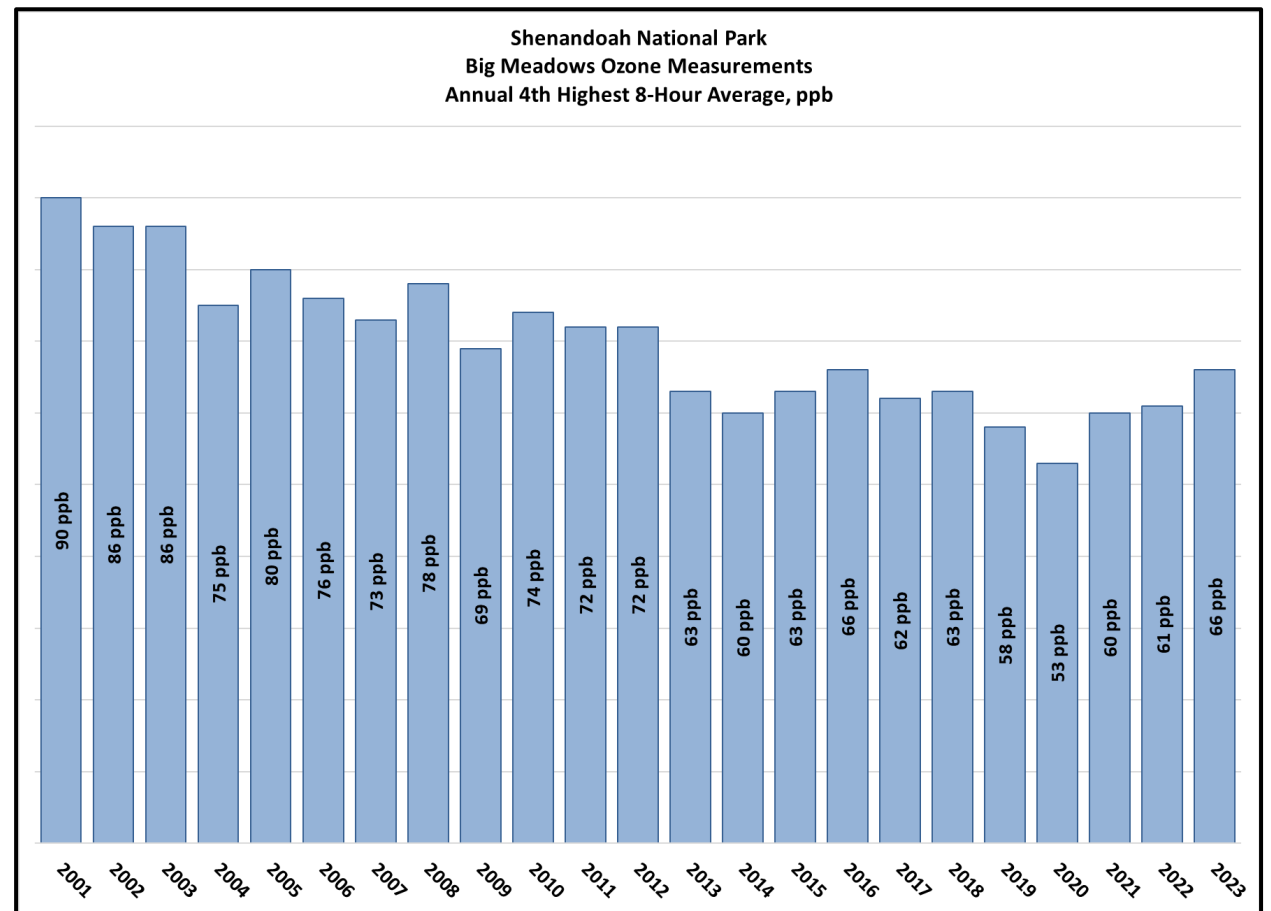
Due to Canadian wildfire influences, in 2023 the Metro DC area experienced more Code Orange and Code Red days than in any other year since 2012.

Metro DC Ozone Issues: Little Left to Control for NOx and VOC

- Few industrial sources in the Northern VA (NoVA) area
 - Municipal solid waste facilities subject to the most stringent NOx limitations in the Northeast/Mid-Atlantic.
 - Coal consumption for electricity generation has ceased. Remaining electricity generation units are generally well-controlled.
 - RACT applied multiple times for previous ozone standards.
- Institutional facilities (military, airports, education, etc) have upgraded/replaced equipment resulting in lower emissions for a variety of reasons:
 - Energy efficiency/cost to run
 - Sustainability
 - Strategic planning
- Enhanced I/M has been operating since early 1990's (car inspections)
- Multiple consumer product VOC control regulations implemented in NoVA (architectural and industrial coatings, personal care products, vehicle repair and refinishing, etc)

Metro DC Ozone Issues – Upwind/Regional Controls

- Upwind controls needed to attain/maintain the 2015 ozone NAAQS in Metro DC.
- Transported ozone remains a concern
 - Big Meadows monitoring site at 3,500 ft elevation in Shenandoah National Park (Luray, Virginia)
 - Considered an “ozone transport” monitor, indicative of pollution traveling into Virginia
 - Measured values hover around 60 ppb since 2013.
 - 2020 data shows impacts of the COVID-19 pandemic on ozone pollution transported into Virginia
 - 2023 data shows impact of wildfires on ozone transported into Virginia





Air Quality Planning Sulfur Dioxide

Federal SO₂ Air Quality Standards

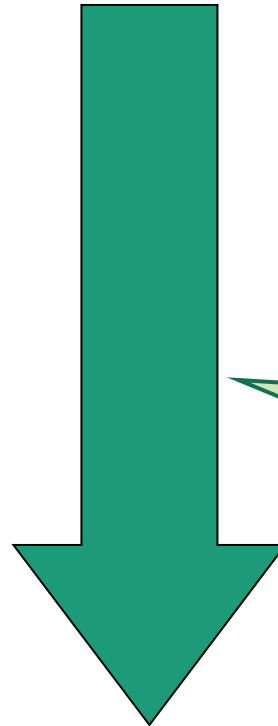
- **1971 Standard**

- Primary
 - 0.14 parts per million (ppm), 24-hour average
 - 0.030 ppm, annual mean
- Secondary: 0.50 ppm, 3-hour average

- **2010 Standard**

- 75 ppb, one-hour average
- Revoked the 24-hour and annual standards
- Secondary standard unchanged

*LESS
STRINGENT*

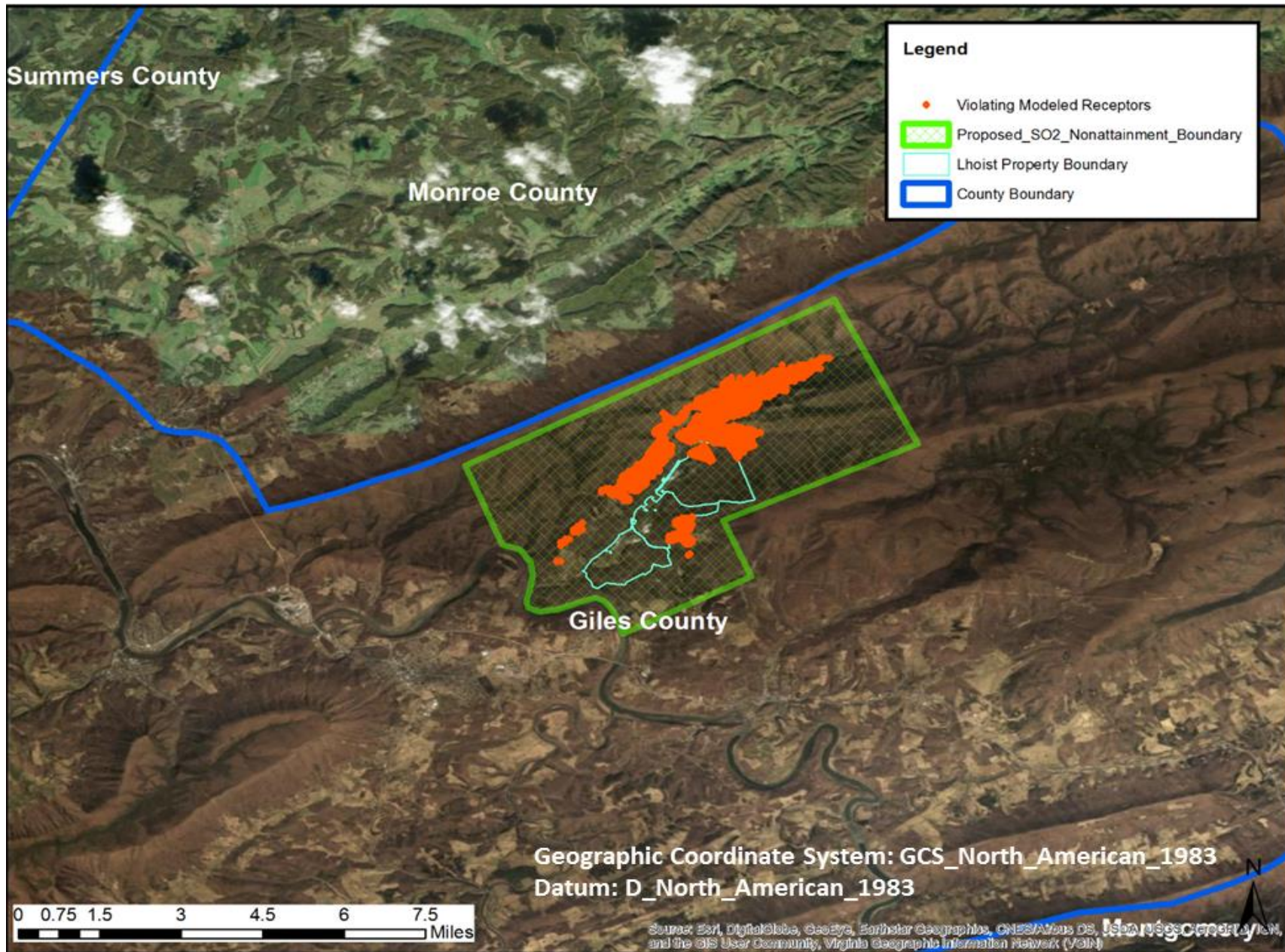


*MORE
STRINGENT*

- *40 years between standards*
- *Significantly more stringent standard*

SO₂ Designations in Virginia

- EPA determined that SO₂ air quality issues were source-specific
- Multiple legal proceedings for the designation process
- All areas except the following in Virginia designated attainment:
 - Buchanan County: Designated “unclassifiable”
 - Jewell Coke Company
 - Extreme terrain
 - Giles County, Partial:
 - Lhoist North America – Kimballton Plant
 - Designated “nonattainment” on March 26, 2021
 - Attainment date is 2026
 - Attainment plan was due to EPA October 2022
 - Measured compliant data for the first time ever in 2023



Giles County (Partial) 2010 SO₂ NAAQS Nonattainment Area

- < 6% of the total area of Giles County
- Surrounds Lhoist North America – Kimballton Plant
- DEQ expects to submit an attainment plan for the area by December 2024.
- Expect to submit a redesignation request for the area due to improved air quality by December 2025.



Air Quality Planning - 2024 PM_{2.5} NAAQS

2024 PM_{2.5} NAAQS

- Final reconsideration and rule revision published March 6, 2024 (89 FR 16202)
- Effective date May 6, 2024
- Revised the annual standard from 12.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to $9.0 \mu\text{g}/\text{m}^3$
- Retained the daily standard - $35 \mu\text{g}/\text{m}^3$
- Significant public health net benefits as high as \$46 billion in 2032:
 - 4,500 avoided premature deaths
 - 800,000 avoided cases of asthma symptoms
 - 290,000 avoided lost workdays

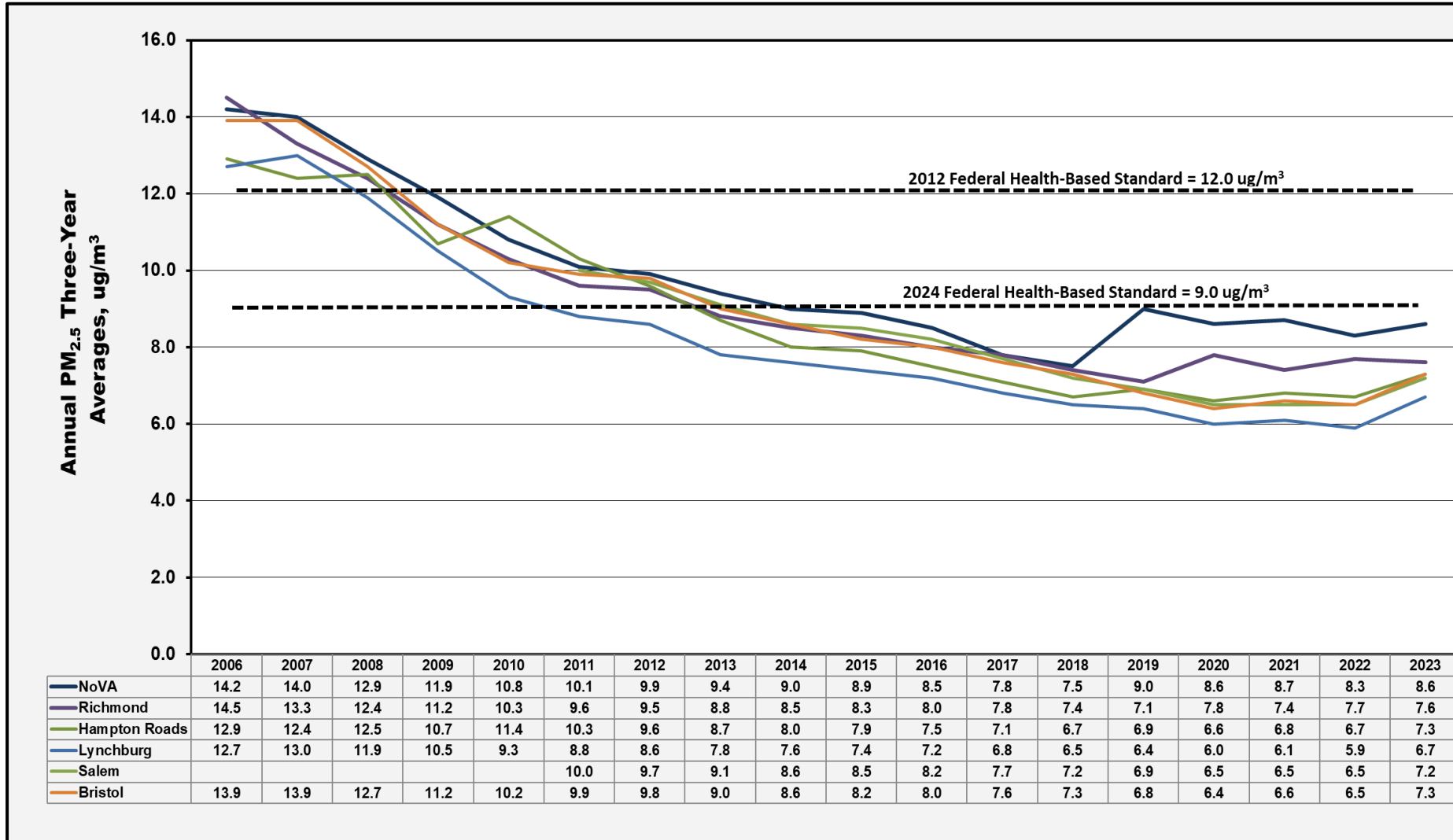
New Standards				
Indicator	Averaging Time	Primary/Secondary	Level	Form
PM _{2.5}	Annual	Primary	9.0 $\mu\text{g}/\text{m}^3$	Annual arithmetic mean, averaged over 3 years
		Secondary	15.0 $\mu\text{g}/\text{m}^3$	
	24-hour	Primary and Secondary	35 $\mu\text{g}/\text{m}^3$	98th percentile, averaged over 3 years
PM ₁₀	24-hour	Primary and Secondary	150 $\mu\text{g}/\text{m}^3$	Not to be exceeded more than once per year on average over a 3-year period

2024 PM_{2.5} NAAQS Implementation Schedule

Action	Deadline	Applicable data years
Initial notifications for intent to submit exception events demonstrations	01/01/2025	2021, 2022, 2023
Exceptional Events demonstrations due to EPA	02/07/2025	2021, 2022, 2023
State initial area designation recommendations due	02/07/2025	2021, 2022, 2023
Initial notification and exceptional events demonstration submittal	09/30/2025	2024
EPA sends 120-day letter for initial area designations	10/9/2025	2022, 2023, 2024
EPA promulgates final 2024 PM _{2.5} NAAQS area designations	02/06/2026	2022, 2023, 2024

- Some states have between 50-100 data points that need exceptional events flags due to the 2023 Canadian wildfires.
- Litigation on exceptional events determinations is on going (*Sierra Club v. EPA*).
- This schedule assumes EPA will process the initial recommendations from the states in a two-year timeframe. The Clean Air Act allows a third year if more information is needed.

Virginia Annual PM_{2.5} Monitoring Data



- Uptick in 2019 data due to near road monitors coming on line
- Uptick in 2023 data due to wildfires
- EPA is adjusting some PM_{2.5} monitoring data to correct a positive bias seen in parts of the country for the T640 and T640X monitors. This chart reflects that adjustment for 2023 data. A few more years will be adjusted.

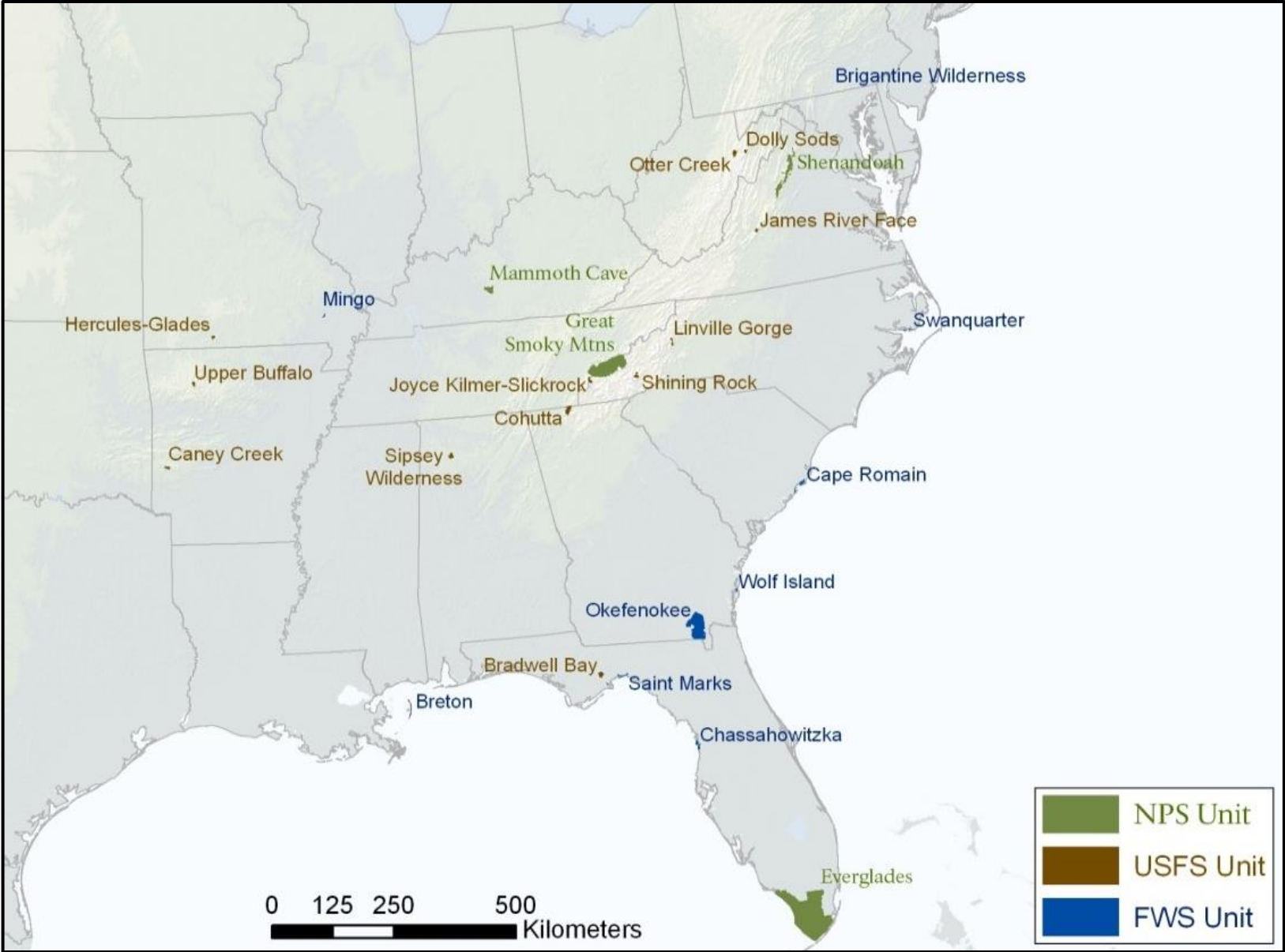


Air Quality Planning Regional Haze

Regional Haze Program

- Authorized under Section 169A of the CAA.
- The Regional Haze Rule ([40 CFR Part 51 Subpart P](#)) calls for states and federal agencies to work together to improve visibility in 159 national parks and wilderness areas.
- Virginia is home to two such areas:
 - James River Face Wilderness Area
 - Shenandoah National Park
- Virginia works with nine other southeastern states to develop regional haze plans.
- EPA has opened a non-regulatory docket as part of the early engagement process for potential rule revisions.
 - [EPA-HQ-OAR-2023-0262](#)
 - Closes June 28, 2024

Class I Areas of Interest to VISTAS States

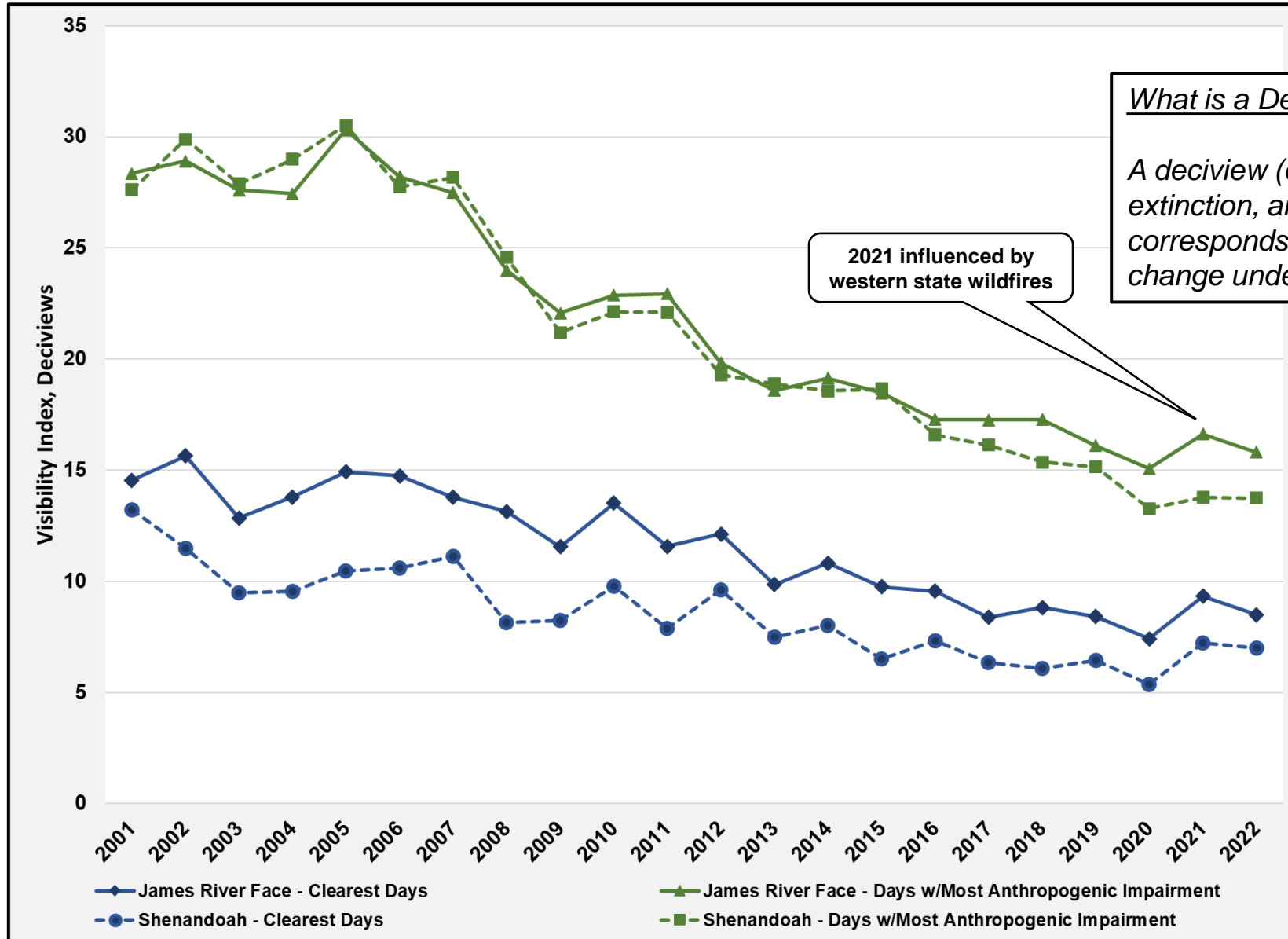


- Virginia Class I Areas:**
- Shenandoah National Park
 - James River Face Wilderness Area

Regional Haze Program – Visibility Impairing Pollutants

- Ammonium Sulfate
 - For VISTAS Class I Areas, has been most important contributor to visibility impairment/fine particulate mass on 20% most impaired days
 - Ammonia (NH₃) and SO₂ emissions impact ammonium sulfate levels.
- Particulate Organic Matter
 - Fire and wildfire impacts
 - Wood burning
- Ammonium Nitrate
 - Becoming more important as sulfate levels drop, high impairment days switch to colder months
 - Ammonia and NO_x emissions impact ammonium nitrate levels (mainly ammonia).
- Elemental Carbon
 - Wildfires, prescribed fires
 - Incomplete combustion of fossil fuel
- Soil
 - Construction activities
 - Saharan dust/dust storms in the southwest
 - Small contribution to southeastern Class I areas
- Sea Salt-coastal sites
- Coarse Mass Particles
 - Construction activities, etc
 - Small contribution to southeastern Class I areas

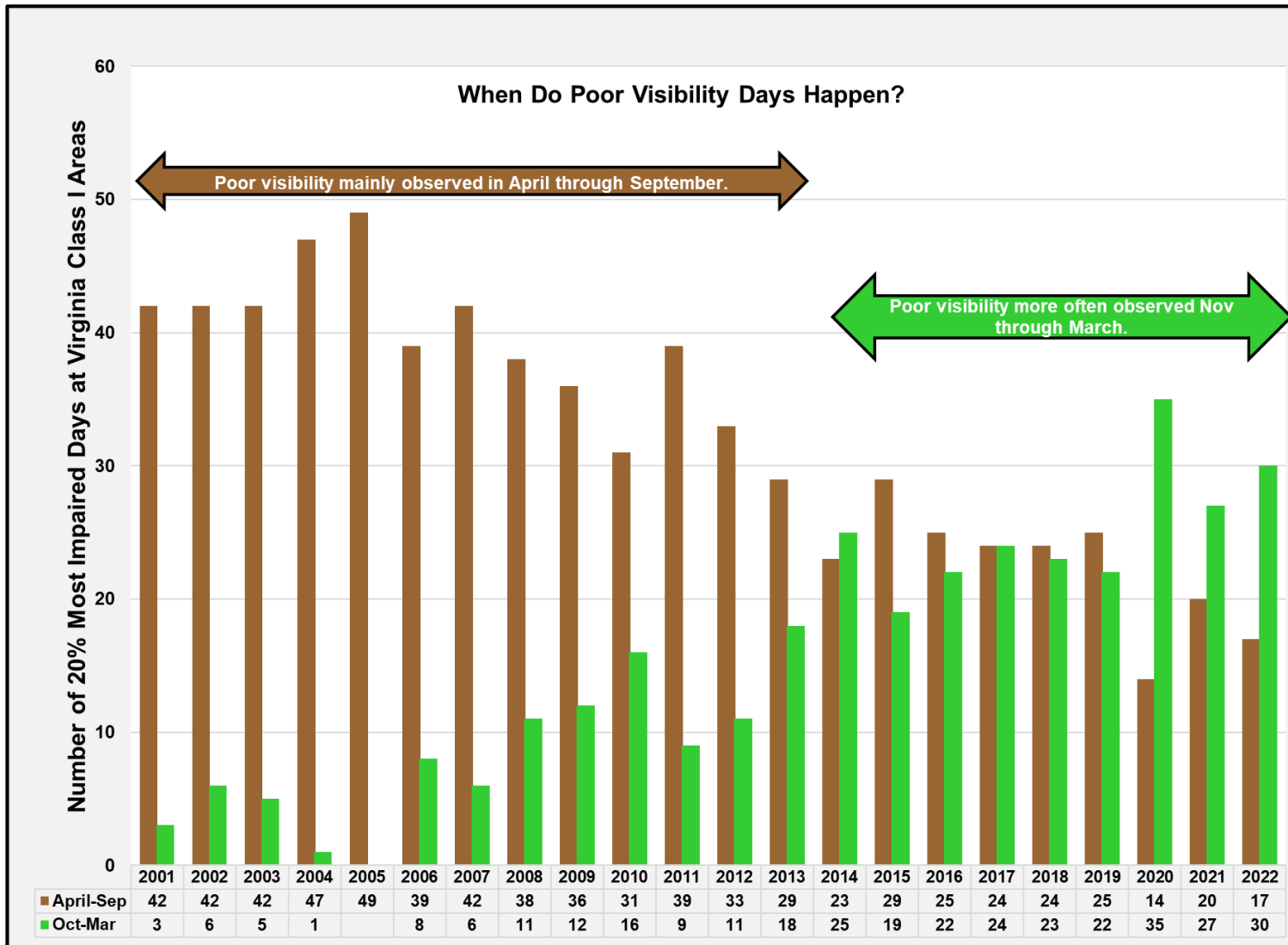
Visibility Improvements at Virginia Class I Areas



What is a Deciview?
 A deciview (dv) is based on measured light extinction, and each deciview change corresponds to a perceptible visible scenic change under clean or polluted conditions.

2021 influenced by western state wildfires

Atmospheric Chemistry at Class I Areas in Virginia



- Reductions in SO₂ emissions have changed atmospheric chemistry in Virginia and the Southeastern states.
- Poor visibility days are now more numerous in the colder months rather than the warmer months.
- Likely due to availability of more ammonium ion in the atmosphere/less ammonium sulfate production.
- May indicate more emphasis on NH₃ and NO_x reductions in the third round of regional haze planning.

Dickey's Ridge, Shenandoah National Park: Improvements in Visibility





Future NAAQS and New/Upcoming Regulations

Secondary NO_x, SO_x, and PM NAAQS

- Consent decree requires EPA to publish a proposal by February 9, 2024, and a final determination or standard by December 10, 2024.
 - *Center for Biological Diversity et al v. Regan*
 - Requires EPA to complete a review of the secondary NAAQS for NO_x, oxides of sulfur (SO_x), and PM
 - Review centers on ecological effects rather than human health impacts
- On April 15, 2024 ([89 FR 26620](#)), EPA published a proposal to revise the existing secondary SO₂ standard to an annual average, averaged over three consecutive years, to a level in the range of 10 – 15 parts per billion (ppb).
 - Comment period closes June 14, 2024.
 - EPA estimates that no additional controls, beyond those required for compliance with the 2010 SO₂ NAAQS, will be needed.
- Proposal suggests retaining the secondary standards for NO_x and PM without revision.

EPA Air Actions-Fast and Furious Finalized

- Rule to strengthen standards for synthetic organic chemical plants and polymers and resins plants, [signed April 9, 2024](#), not yet published.
- Updates to the Mercury and Air Toxics Rule for electricity generating units (EGUs), published May 7, 2024 ([89 FR 38508](#))
- New source performance standards (NSPS) and guidelines for EGUs addressing greenhouse gas (GHG) emissions, published May 9, 2024 ([89 FR 39798](#))
- GHG emission standards for Heavy Duty Vehicles – Phase 3, published April 22, 2024 ([89 FR 29440](#))
- Multi-pollutant emission standards for model years 2027 later light duty and medium duty vehicles – published April 18, 2024 ([89 FR 27842](#))
- Update to requirements for ethylene oxide sterilizers, published April 5, 2024 ([89 FR 24090](#))
- Updates to Petroleum Refineries National Emission Standards for Hazardous Air Pollutants (NESHAPS), published April 4, 2024 ([89 FR 23840](#))
- NSPS and existing source guidelines for the oil and gas sector, published March 8, 2024 ([89 FR 16820](#))
- Federal “Good Neighbor Plan” for the 2015 O₃ NAAQS, published June 5, 2023 ([88 FR 36654](#))

....and this is not the full listing.....

EPA Air Actions-Fast and Furious Proposed or In Progress

- Proposed
 - Regulations related to project emissions accounting, published May 3, 2024 ([89 FR 36870](#))
 - NESHAP updates for reconsideration to risk at petroleum refineries published April 4, 2024 ([89 FR 23840](#))
 - Existing source large municipal waste combustor proposal, published Jan 23, 2024 ([89 FR 4243](#))
 - Title V permit “applicable requirements” clarification, published Jan 9, 2024 ([89 FR 1150](#))
 - NESHAP updates for rubber tire manufacturing, published Nov 16, 2023 ([88 FR 78692](#))
 - NSPS updates to volatile organic liquid storage vessel standards, published Oct 4, 2023 ([88 FR 68535](#))
 - Review of rule reclassification of major sources as area sources under Section 112, published Sep 27, 2023 ([88 FR 66336](#))
 - Requirements for new hazardous air pollutant additions, published Sep 13, 2023 ([88 FR 62711](#))
 - Revisions to the Air Emissions Reporting Requirements, published Aug 9, 2023 ([88 FR 54118](#))
 - Draft contingency measure guidance - published March 23, 2023 ([88 FR 17571](#))
- In progress, not yet proposed:
 - Updates to the Regional Haze Rule ([40 CFR 51 Subpart P](#))
 - [Docket](#) (opened March 26, 2024) for forthcoming GHG existing turbine standards

....and this is not a full listing.....



Questions?
