



Focus

Redesignating Nonattainment Areas

Background

Areas that have experienced persistent air quality problems have been designated by the U.S. Environmental Protection Agency (EPA) as nonattainment areas. The federal Clean Air Act requires additional air pollution controls in these areas. Each nonattainment area is declared for a specific pollutant. Nonattainment areas for different pollutants may overlap each other or share common boundaries.

Several of the nonattainment areas in Washington now appear to be meeting the federal health-based standards for outdoor air quality. This apparent compliance with the federal standards does not automatically bring an area's nonattainment designation to an end. The federal Clean Air Act requires the state to follow an extensive process to prove that the nonattainment designation should be removed. The basic federal requirements are:

- The federal outdoor air quality standards have been attained.
- EPA has approved the State Implementation Plan for bringing the area into attainment.
- The state must prove to EPA that the improved air quality is due to permanent and enforceable reductions in pollutant emissions.
- EPA has approved a state/local maintenance plan, including a contingency plan, that will keep the area's air quality within the standards.

Washington's nonattainment areas for ozone met these requirements and were redesignated as attainment. Two of the state's carbon monoxide nonattainment areas were also redesignated as attainment.

Meeting the standards

Washington still has nonattainment areas for particulate matter and carbon monoxide. To be considered for redesignation, a nonattainment area must not violate the following federal air quality standards:

- **Particulate matter:** No more than an average of one exceedence of the standard per year in a consecutive three-year period.
- **Carbon monoxide:** No more than one exceedence of the standard each year during a two-year period. (No averaging is allowed; there can't be two exceedences one year and none the next.)

Compliance with the standards must be based on air quality monitoring. The Department of Ecology (Ecology) must demonstrate that the monitoring equipment was located in places likely to experience the highest concentrations of the pollutant in order to support Ecology's case that the standard has been met.

The plan for bringing the area into attainment

Ecology must complete and obtain EPA approval of the State Implementation Plan that specifies control measures to improve air quality and bring the area into attainment. Ecology must also complete any other requirements specified by the Clean Air Act. To qualify for redesignation, Ecology must prove that air quality improvements are *permanent* and *enforceable*. They must not be attributable to unusually favorable weather conditions or such factors as economic downturns that resulted in less traffic and industrial activity.

Maintenance plan

For an area to be redesignated, EPA must approve a maintenance plan. Ecology must outline the measures that will be used to keep the area's air quality within the federal standards for 10 years after redesignation. Circumstances will dictate whether fewer, the same, or additional control measures will be required. The plan must describe measures that will be taken to correct violations of the air quality standards, if they occur. Ecology may submit the maintenance plan at the same time it petitions for redesignation.

Other requirements

Inventory

Ecology and local air quality agencies must prepare an inventory showing the sources of emissions and how much pollution they generate. Sources are things such as vehicles, wood stoves, and commercial or industrial facilities that generate air pollution. Ecology must identify the maximum amount of emissions that can be allowed without violating the air quality standards.

Maintenance demonstration

Using a computer model or other means, Ecology must demonstrate to EPA's satisfaction that the maintenance plan will keep air quality within the federal standards for 10 years, even if the number of pollution sources increases.

Monitoring

The state must continue its monitoring program. Ecology must commit to maintaining a monitoring program that will effectively show whether the federal standards are being maintained. The program must allow for special studies in case traffic or other air pollution source patterns change. These studies could lead to new permanent monitoring sites if high pollution concentration areas change.

Verification

Ecology must submit its plan for verifying that the air quality standards are being maintained and enforced. This verification scheme must keep track of the maintenance plan. This can include updates to the inventory of the assumptions and inputs used for modeling.

Conclusion

The federal procedure for removing an area's nonattainment designation is detailed and extensive. The task of fully meeting these requirements and obtaining redesignation can be expected to take approximately two years for each area. Ecology and the local air quality agencies work to gain redesignation in all areas that meet the standards.

For more information

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