

## COMMENTS ON PROPOSED NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) FOR SULFUR DIOXIDE (SO<sub>2</sub>)

### Background

The Environmental Protection Agency (EPA) initially established the National Ambient Air Quality Standards (NAAQS) for Sulfur Dioxide (SO<sub>2</sub>) in 1971 and it has not been revised. The current NAAQS for SO<sub>2</sub> is 140 parts per billion (ppb) over 24 hours and 30 ppb annually. EPA is proposing a 1-hour NAAQS that is more protective of human health. EPA is considering a range of 50 ppb to 100 ppb for the new 1-hour standard. If a 1-hour standard is adopted within the proposed range, EPA is also proposing to revoke the 24 hour and annual standards.

EPA is also requesting comments on determining monitor locations and updating monitoring performance methodology.

The Regional Air Quality Planning Committee (RAQPC) recommends that the following comments be submitted to EPA:

- The hourly NAAQS for SO<sub>2</sub> should be revised as proposed by EPA to protect the public health (and the **50 ppb** level should be adopted to protect public health).
- Monitors should be located or relocated to sites of expected maximum concentrations of SO<sub>2</sub> as determined by the emissions inventory and other data sources.
- Support EPA's proposal to update the performance requirements for monitors.

### Current Situation

The 50 ppb to 100 ppb range for the 1-hour standard under consideration by EPA is supported by health studies. A standard in this range will be protective of human health. Considering the trends in SO<sub>2</sub> data for the Houston-Galveston-Brazoria (HGB) area as well as many planned projects to reduce SO<sub>2</sub> emissions, HGB should remain in compliance, even if a standard at the 50 ppb level is adopted. The economic impact to the HGB area should be minimal as these projects are already planned as a result of enforcement actions or other regulations.

Regarding the number and location of monitors, the proposal would not require additional monitors in the HGB area; however, some may have to be relocated to be sited in areas of expected maximum concentration of SO<sub>2</sub>.

The proposed NAAQS also will change the requirements for monitors by requiring Ultra Violet Florescent (UVF) monitors. The proposal reflects an improvement in technology. UVF monitors are currently being used in the HGB area.

### Action Requested

Request authorization to submit comments to the Environmental Protection Agency on the proposed National Ambient Air Quality Standard for Sulfur Dioxide consistent with the positions explained above.