

2. 2015 – Resolution Supporting Retention of the Current Ozone Air Quality Standard

WHEREAS, the U.S. Environmental Protection Agency (EPA) has proposed to revise the 2008 primary National Ambient Air Quality Standard for ozone from 75 parts per billion (ppb) to a range of 65 ppb to 70 ppb, while taking comment on retaining the existing standard and an alternative standard of 60 ppb (79 Fed.Reg. 79234, December 17, 2014); and

WHEREAS, ground level ozone, or urban smog, is caused by the photochemical reaction of emissions of nitrogen oxides (NOx) and volatile organic compounds (VOCs) in the presence of sunlight; and

WHEREAS, emissions contributing to ozone come from a variety of natural and manmade sources, including motor vehicles, power plants, refineries, manufacturing and industrial facilities, oil and natural gas production, and commercial establishments such as restaurants, dry cleaners, and auto repair shops; and

WHEREAS, EPA air quality trends data show that ozone concentrations have decreased significantly in both urban and rural areas over the past two decades in response to state and federal emission control programs; and

WHEREAS, most states are on-track to be fully in attainment with the current standards, but some have not yet reached full attainment according to EPA; and

WHEREAS, 23 states, including 12 of the 16 states in the Southern States Energy Board (SSEB) region recommended in their comments on the proposed standard that EPA should retain the current primary standard; and

WHEREAS, a revised ozone standard of 65 or 70 ppb could lead to widespread nonattainment designations in southern states that already meet the current ozone standards; and

WHEREAS, increased nonattainment designations would stifle industrial and business expansion by imposing expensive new emission "offset" requirements; and

WHEREAS, the industries most impacted by new nonattainment area designations include chemicals, refineries, paper, cement, steel, aluminum, and fossil-fueled power plants; and

WHEREAS, major construction projects, such as new commercial or residential developments as well as highway construction can be impacted by transportation "conformity" requirements that limit emissions from associated vehicle activity; and

WHEREAS, EPA's Regulatory Impact Analysis (RIA) estimates that the annual cost of compliance with a revised standard of 70 ppb would be \$3.9 billion, rising to \$15 billion annually for 65 ppb, and to \$39 billion for the alternative standard of 60 ppb; and



Adopted on September 28, 2015

Sponsored by: Representative Chuck Martin of Georgia*
Representative Bill Sandifer of South Carolina

WHEREAS, EPA reports that 358 counties in the nation would violate a standard of 70 ppb, and that an additional 200 counties would violate a standard of 65 ppb; and

WHEREAS, retaining the current ozone standard would provide for continued air quality improvement throughout the nation, as emission reduction programs under existing EPA regulations are implemented; and

WHEREAS, SSEB states produce nearly 50 percent of the nation's electric power in an affordable, safe and reliable manner and the North American Electric Reliability Corporation and Regional Transmission Organizations are raising cautions about the reliability of the nation's electric grid in light of the projected retirement of more than 60 Gigawatts (GW) of generating capacity prior to 2020 due to economic considerations and compliance with more stringent environmental requirements; and

WHEREAS, EPA predicts in its RIA for its final Clean Power Plan up to 29 GW of coal-fired generating units would close by 2025 with 11 GW more closing 2030, and many of these units are in or serving SSEB states; and

WHEREAS, EPA's detailed projections of known controls needed to meet a 65 ppb standard include 79,000 individual control actions across all energy-intensive industries, oil and gas production and transmission facilities, and dozens of other industrial and commercial sectors.

THEREFORE BE IT RESOLVED that the Southern States Energy Board urges the EPA to retain the current ozone air quality standards in order to provide continued public health protection and air quality improvement as other EPA and state regulatory programs are implemented.