ADEM AIR UPDATE

Ron Gore

Alabama Department of Environmental Management

September 2023

New Air Quality Standards for PM-Fine and Ozone

- Problems for Alabama if EPA lowers PM-Fine standards to 9.5 or below from current 12
- EPA recently punted on revising the ozone standard

Permitting Issues

- NGO's are petitioning EPA on Title V Operating Permits
- More procedure on minor source permitting?

Enforcement Issues

NGO is commenting on penalty Orders, asking:

- More public involvement in enforcement process
- Assessment of health effects of excess emissions
- Encourage EPA to participate in State actions or to take independent action
- More use of Supplemented Environmental Projects
- HIGHER PENALTIES

Climate Change

- Lots of federal dollars out there for electric vehicles, solar, wind, batteries
- ADEM will not make decision on grants, but can help applicants

IT Upgrades

- Paperless communication is on the way

Budget

- Long-term trend of Title V fees is up on a $/ton basis, but not up in total real dollars

- $/ton inversely proportional to emissions base

- No State General Fund money for Air in over 30 years

- EPA grant stable in last 15 years in unadjusted dollars, shrinking in real dollars

Air Division Staffing

- Management personnel stable
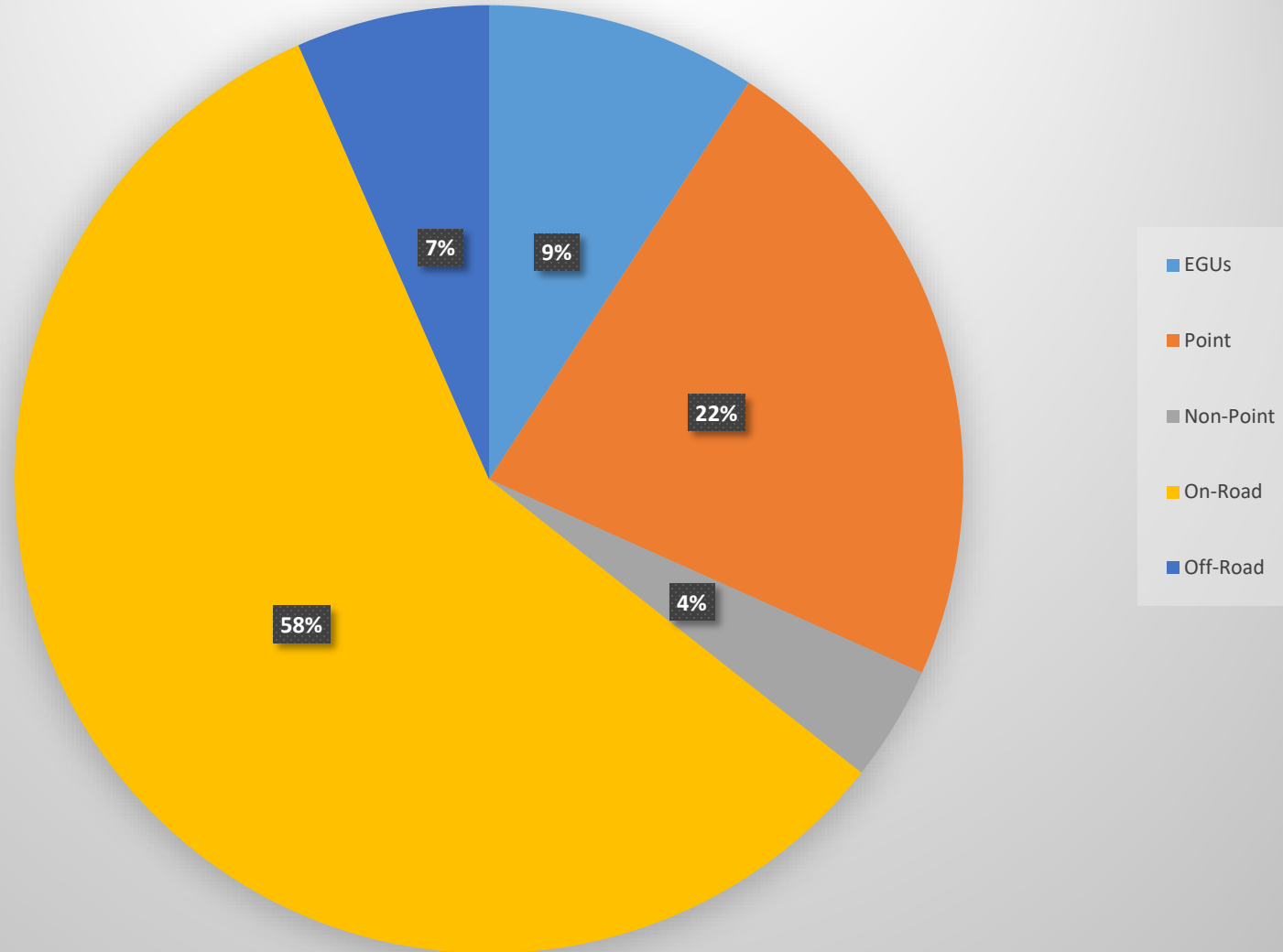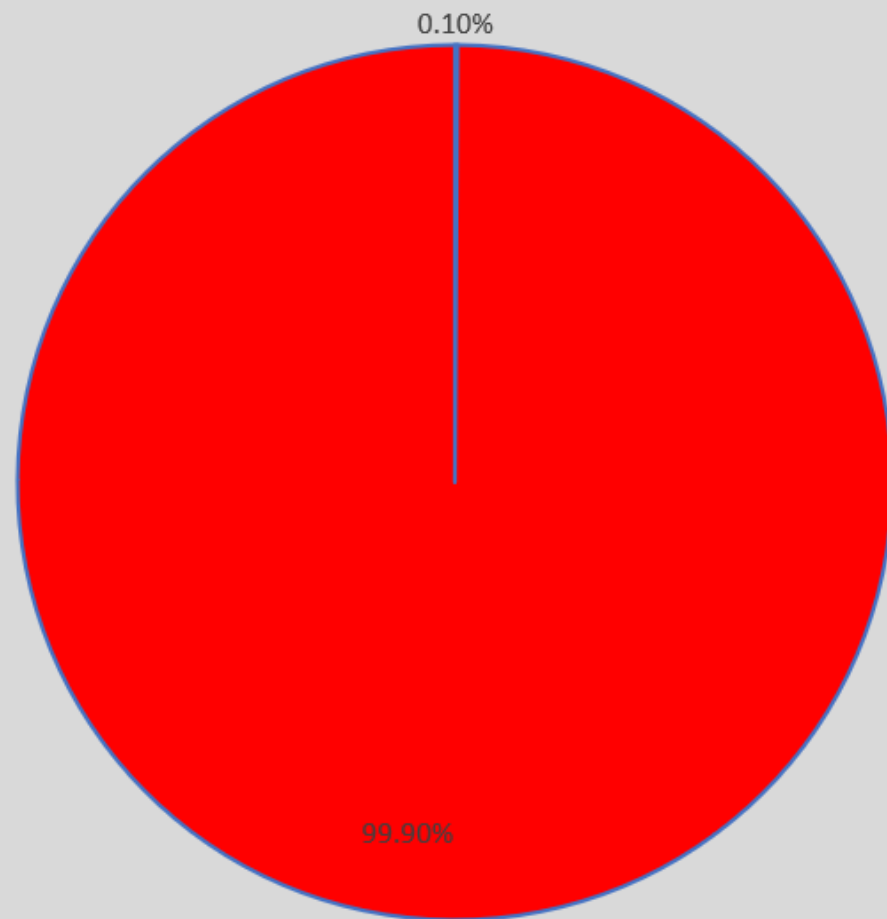- Problems with hiring and retaining qualified staff

Relationship with EPA

- No problems in routine interaction
- Problem is with 180° reversals by EPA and Administration
- Coal ash and Ozone Transport reversals have led to ADEM filing suit.

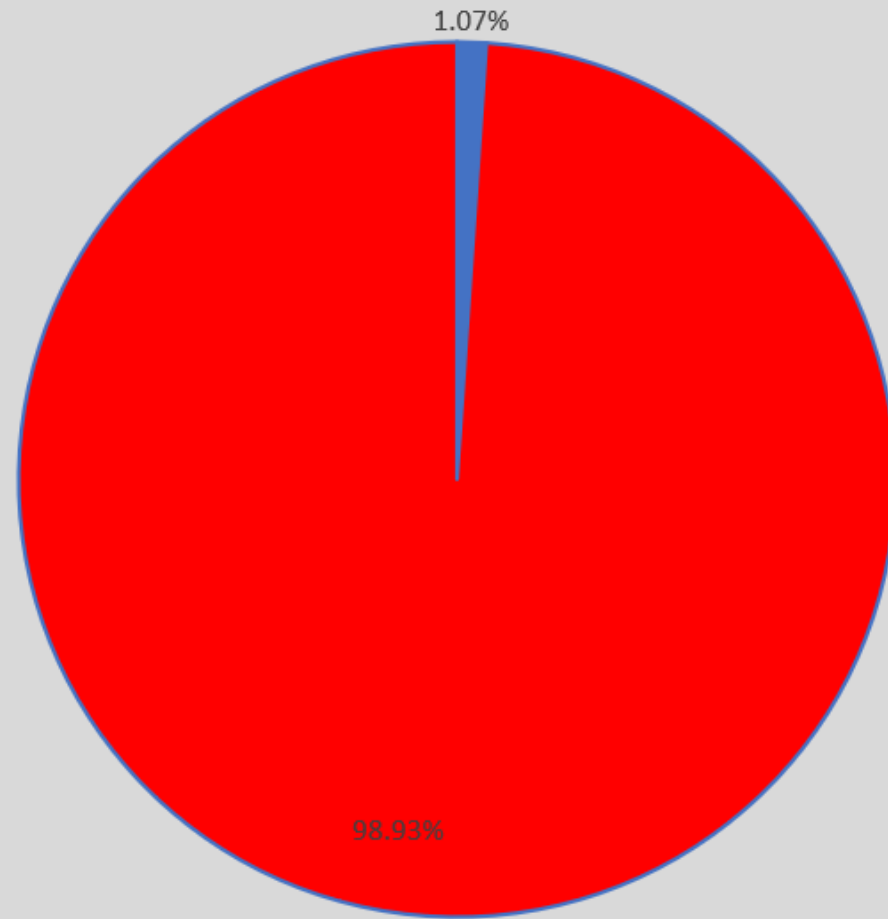# NOₓ Emissions in Alabama
2022

Percentage of Ozone Season NOx

EGUs · Point · Non-Point · On-Road · Off-Road

7% · 9% · 22% · 4% · 58%

Percent NO2 Reductions from EGU in 2023
Required by EPA FIP

0.10%

99.90%

■ % EGU NO2 Reduction

Alabama Contribution to the Ozone Standard(70ppb)
in Galveston, TX per EPA Modeling

1.07%

98.93%

■ Alabama Percent Contribution (0.75ppb) ■ NAAQS

Alabama's Contribution to the Excess Ozone over the Standard (ppb) in Galveston, TX per EPA Modeling

0.0024

2.3976

■ Alabama Contribution   ■ All other States

Procedural Reversals by EPA

- ADEM submitted a Plan for ozone transport in 2018
- After rulemaking protocols, EPA's Region 4 Administrator signed the approval.
- EPA told ADEM the approval was on the way to be published in the Federal Register.
- In March 2020, EPA told ADEM that the FR publication was on hold due to COVID.
- In Spring 2022, EPA told ADEM, with 2 day's notice, that the submittal was to be disapproved.