

FEATHER RIVER AIR QUALITY MANAGEMENT DISTRICT  
MEMORANDUM  
12/09/2019

TO: FRAQMD BOARD OF DIRECTORS

FROM: Christopher D. Brown, AICP, APCO

SUBJECT: Report on the 2015 Ozone National Ambient Air Quality Standards (NAAQS) bump up from Moderate to Serious Classification.

RECOMMENDATION:

None, informational item only.

DISCUSSION:

The southern portion of Sutter County is part of the Sacramento Federal Nonattainment Area (SFNA) for the National Ambient Air Quality Standards (NAAQS) for ground level ozone. The SFNA also includes all of Sacramento and Yolo counties and portions of Placer, El Dorado, and Solano counties. The SFNA does not currently meet the 8-hour ozone NAAQS set by the U.S. Environmental Protection Agency (US EPA). The US EPA has promulgated three 8-hour ozone NAAQS: the 1997 standard of 0.08 parts per million (ppm); the 2008 standard of 0.075 ppm; and the 2015 standard of 0.070 ppm. Ozone nonattainment classifications increase in order of severity. The classifications are Marginal, Moderate, Serious, Severe, and Extreme. Increasing severity results in more stringent requirements. Table 1 shows the SFNA's current nonattainment classification and associated attainment date for each standard.

Table 1: Ozone standards and SFNA classifications

	1997 NAAQS	2008 NAAQS	2015 NAAQS (Current)	2015 NAAQS (Requesting)
Standard	0.08 ppm	0.075 ppm	0.070 ppm	0.070 ppm
Classification	Severe	Severe	Moderate	Serious
Attainment Deadline	June 15, 2019	July 20, 2025	August 3, 2024	August 3, 2027

Section 181(b)(3) of the federal Clean Air Act (CAA) allows a state to voluntarily request that an area be reclassified for nonattainment status. The Feather River Air Quality Management District, in cooperation with other air districts in the SFNA, has determined that it is in the region's best interest to request that the California Air Resources Board (CARB) petition the

US EPA to reclassify the SFNA from Moderate to Serious for the 2015 8-hour ozone NAAQS. While CARB does not need the FRAQMD Board approval, the District staff would like to provide the Board the background and reasons associated with this request.

A voluntary reclassification from Moderate to Serious would extend the attainment deadline from August 3, 2024 an additional three years to August 3, 2027. Although the reclassification to Serious entails additional planning and control requirements (e.g. vehicle miles traveled demonstration and contingency provisions), the SFNA is already subject to these requirements under the 2008 ozone standard because of anti-backsliding provisions. Consequently, the request does not add any new requirements to the SFNA.

Updates on the SFNA's status for each ozone standard are provided below.

**1997 Ozone Standard:** The SFNA had to demonstrate attainment of this standard by June 15, 2019, using air quality data from 2016 to 2018. Due to the wildfires in the summer of 2018 (July and August), several days with unusually high ozone concentrations that exceeded the 1997 ozone standard were recorded. Federal regulations allow nonattainment areas to request that air quality data impacted by "exceptional events" be excluded from the data set used for attainment demonstration. The SFNA has successfully argued in the past that wildfires are "exceptional events." The SFNA air districts have initiated the data exclusion process for the 2016-2018 time period. If the US EPA approves the exclusion request, staff anticipates that the region will show attainment of the 1997 standard by the attainment deadline.

**2008 Ozone Standard:** The air districts in the SFNA adopted the Attainment and Reasonable Further Progress Plan for the 2008 standard in 2017 and are working towards attaining this standard by July 2025. Court decisions required amendments and supplemental documentation and the Air Resources Board submitted some of the necessary documentation to the US EPA in 2018. The air districts in the SFNA must still adopt a contingency measure that would go into effect should the area not attain the standard by the deadline or miss a reasonable further progress milestone.

**2015 Ozone Standard:** On June 4, 2018, the US EPA issued a final rule classifying the SFNA as a Moderate nonattainment area for the 2015 ozone standard, effective August 3, 2018. The Moderate classification requires the SFNA to demonstrate attainment with the standard before August 3, 2024.