

Responses to November 20, 2013 Open House Written Questions

Version 1 - November 29, 2013

1 11/20/2013	Why do the proposed regulations not reflect the Nat. Air Quality Safety limits of 35 ug?
<p>In the regulation proposal, a 24-hour PM_{2.5} concentration of 56 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) would initiate the first level of a formal air episode, an alert. The department proposed this level as it is equivalent to the federal Air Quality Index value where air quality is deemed “Unhealthy” for all individuals. The proposed concentration is higher than the 35 $\mu\text{g}/\text{m}^3$ 24-hour National Ambient Air Quality Standard (NAAQS) for PM_{2.5}. The NAAQS is set at a level that is meant to protect sensitive populations, including children, the elderly, and those with existing medical conditions. The NAAQS level corresponds with the Air Quality Index value where air quality is deemed “Unhealthy for Sensitive Groups.” Under the proposal, air quality advisories could still be called at PM_{2.5} concentrations between 35 and 55 $\mu\text{g}/\text{m}^3$ (per 18 AAC 50.245(b)) along with requests for voluntary actions to curtail emissions. The department is seeking comment on the proposed episode levels.</p> <p>Setting air quality episode concentration thresholds is a requirement for state’s implementing the National Ambient Air Quality Standards under the Clean Air Act. Establishing the thresholds for the PM_{2.5} concentration levels that can trigger a formal air quality alert, air quality warning, and air quality emergency helps to provide a framework for DEC and local air agencies as they work together to inform the public of poor air quality conditions and evaluate response actions. Air quality episodes as a result of human-caused air pollution should not be frequent events in any community; response actions to episodes are not meant to replace on-going formal control programs to bring an area into compliance with the health-based air quality standard. The development and implementation of an attainment plan will reduce the overall risk of areas reaching unhealthy levels of air pollution, the need to declare air episodes and the subsequent need to take actions for these significant but rarer air pollution events that could impact a broader sector of the public. One could view response to an air quality episode as similar to a fire department responding to a single dangerous fire while the development and implementation of the PM_{2.5} attainment plan is deciding what needs to be done to lower the risk of all fires in the future.</p>	

