

NAAQS

AMERICA'S OIL AND NATURAL GAS INDUSTRY

ON PARTICULATE MATTER

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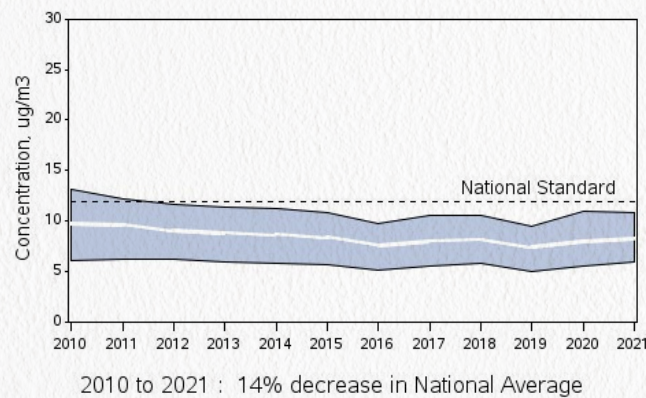
PARTICULATE MATTER PROPOSED RULE

Particulate matter (PM) is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. It can come from uncontrolled combustion, such as from fireplaces, outdoor grills and nearby roadways, as well as various industrial activities.

The US Environmental Protection Agency (EPA) is taking an unnecessary, discretionary action to reconsider and tighten the recently promulgated National Ambient Air Quality Standards (NAAQS) for fine particulate matter. EPA has a statutory duty under the Clean Air Act to review the NAAQS and in 2020 the Administrator concluded that PM standards are protective of public health and the environment. Now, without significant new health information, EPA is proposing standards that will have dramatic impacts on the US economy.

January 2023, EPA released the notice for proposed rulemaking on PM to lower the annual health-based standard from the current 12 µg/m³ to a range of 9-10 µg/m³.

PM2.5 Air Quality, 2010 - 2021
(Seasonally-Weighted Annual Average)
National Trend based on 599 Sites



Source: <https://www.epa.gov/air-trends/particulate-matter-pm25-trends>



NOTABLE HIGHLIGHTS

1. Air quality has improved under the current standards --- over the last decade, there has been a 14% decrease in national average PM concentrations.
2. Since the 2020 PM standards were affirmed, there is no new science to compel further tightening of both the daily and annual standards.

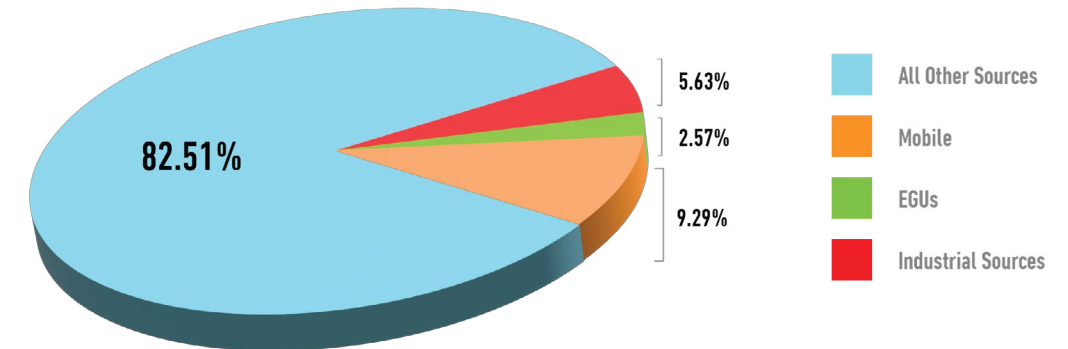
FLAWS WITH PROPOSED RULE

3. The burden to attain tighter standards will fall on non-industrial sources such as unpaved county roads, as well as industry. More cost-effective controls on other source categories will be critical to attain a lower PM NAAQS nationwide, making attainment unlikely.
4. EPA's proposal would result in as much as a 32-fold increase in counties not meeting the proposed standards - burdening state and local governments, threatening US competitiveness, and impacting consumers.

MAJORITY OF PM CONTRIBUTIONS ARE FROM OTHER NON-INDUSTRIAL SOURCES

Non-industrial sources account for more than 80% of particulate matter emissions. Controlling non-industrial, "all other" source, categories will be necessary to attain lower PM NAAQS nationwide.

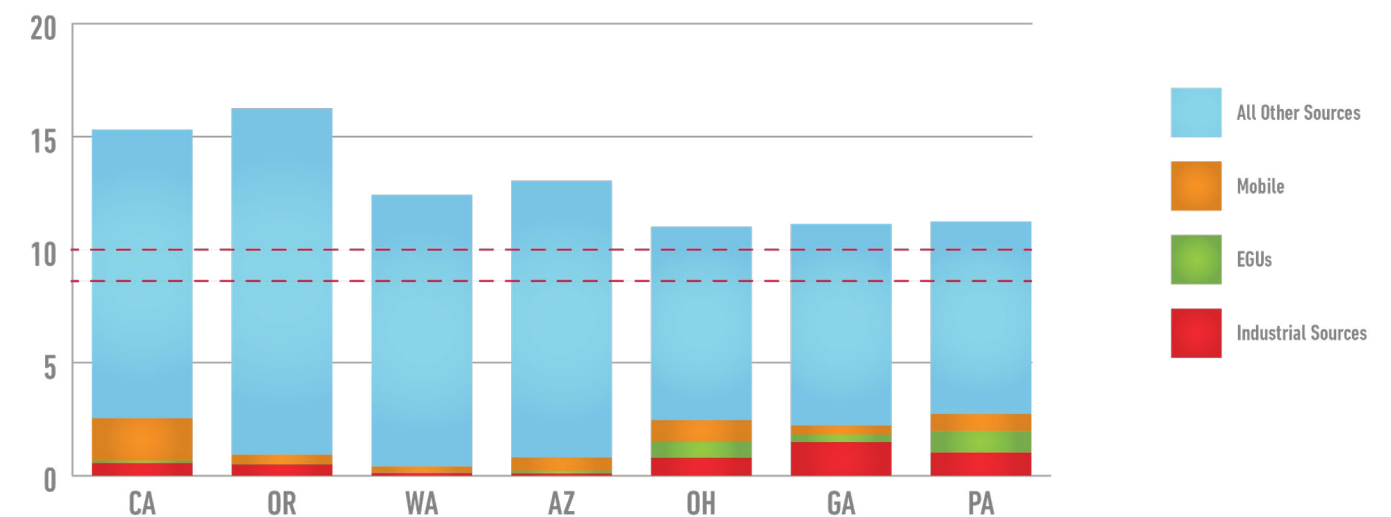
PM MODELED AVERAGE SOURCE CONTRIBUTIONS



All Other Sources includes non-point sources (e.g., fugitive roadway dust, residential wood combustion), agriculture, wildfires, biogenics, and international emissions.

Even without industrial, electric generating units (EGUs), and mobile source emissions, attaining lower PM standards across the nation will not be feasible for much of the nation, including key industrial and agricultural areas.

REMOVING INDUSTRIAL, EGU, AND MOBILE EMISSION CONTRIBUTIONS MIGHT NOT BE ENOUGH TO MEET THE PROPOSED PM NAAQS IN CERTAIN STATES

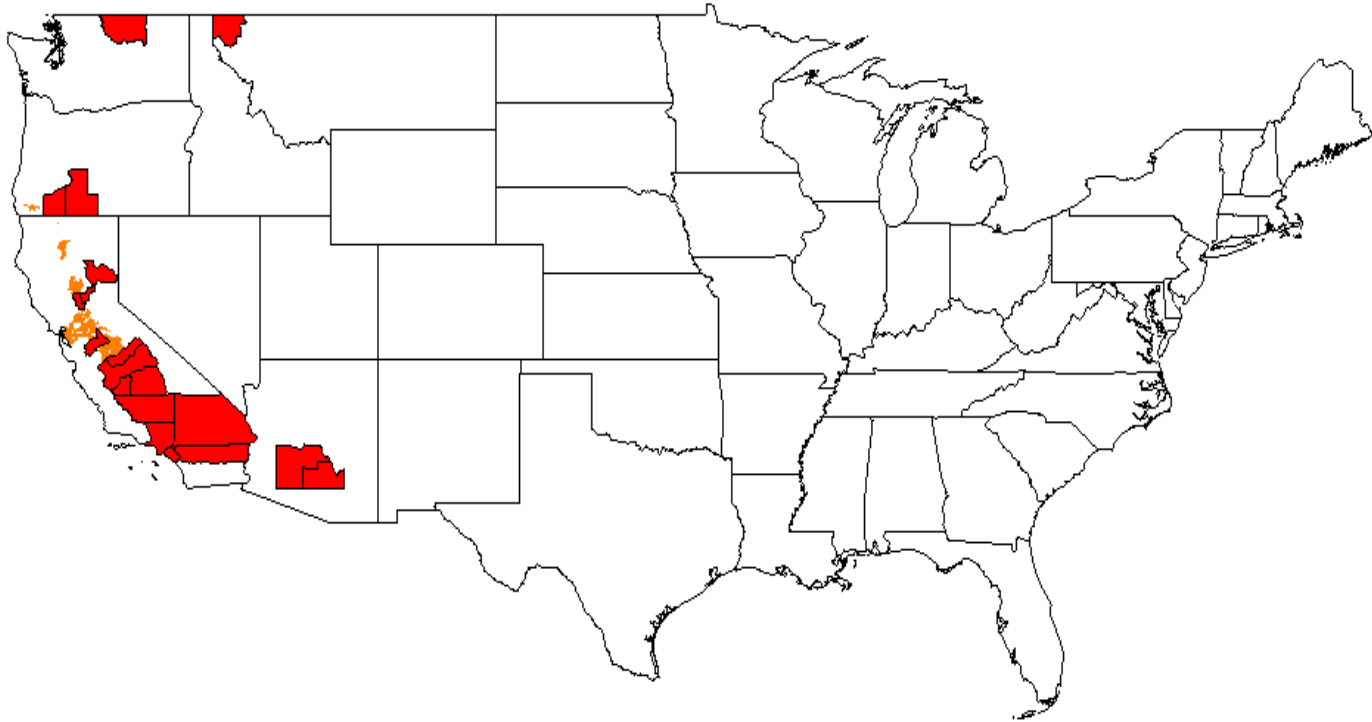


LOWERING THE STANDARDS WILL SIGNIFICANTLY PLACE NEW AREAS INTO NONATTAINMENT

An analysis of the three most recent years of particulate matter data show that at the current standards, 20 counties are STILL measured or projected to be out of attainment with the standards. EPA is considering lowering those standards to as low as 8 ug/m³, which would increase the number of counties in non-attainment to 647 - a 32-fold increase in the number of counties and associated metropolitan areas.

This includes even pristine areas with no industrial activity such as national parks. Nonattainment areas will likely impose costly controls on not just industry, but on nonindustrial sources, as well as, local and state agencies to achieve unnecessary lower standards, creating permitting challenges across the country.

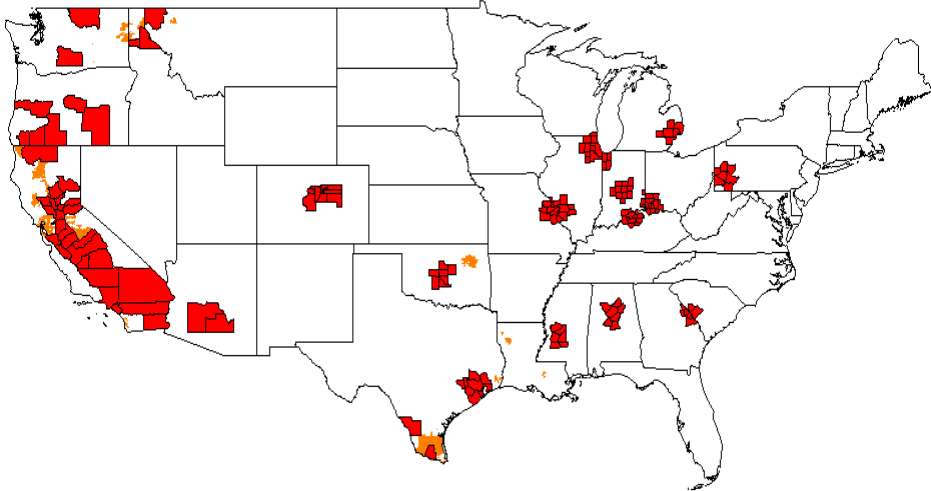
Current Annual Average PM_{2.5} Concentration > 12 µg/m³



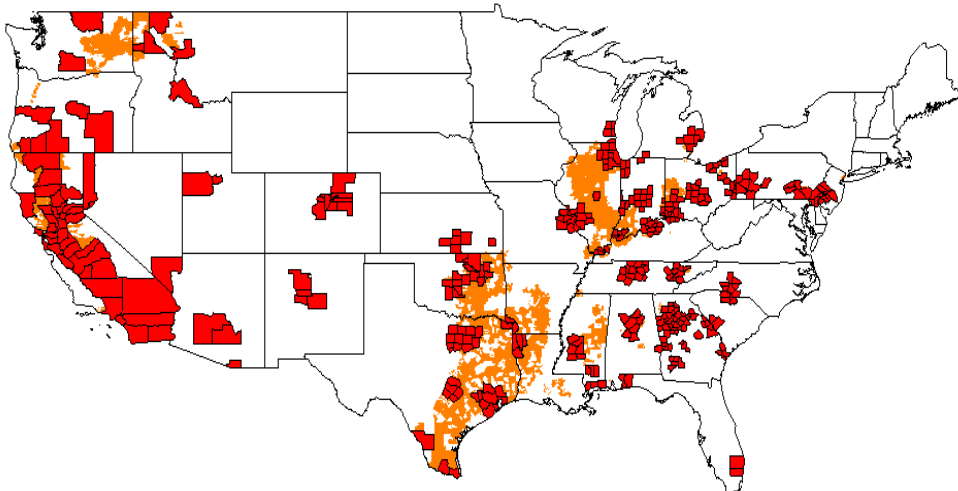
Red - Monitored Counties and associated "metropolitan areas" (2019-2021 DV)
Orange - Monitored/Modeled Blended Census Tract Level (2018 Ann Avg)

National representation of the new nonattainment areas if particulate matter is lowered.

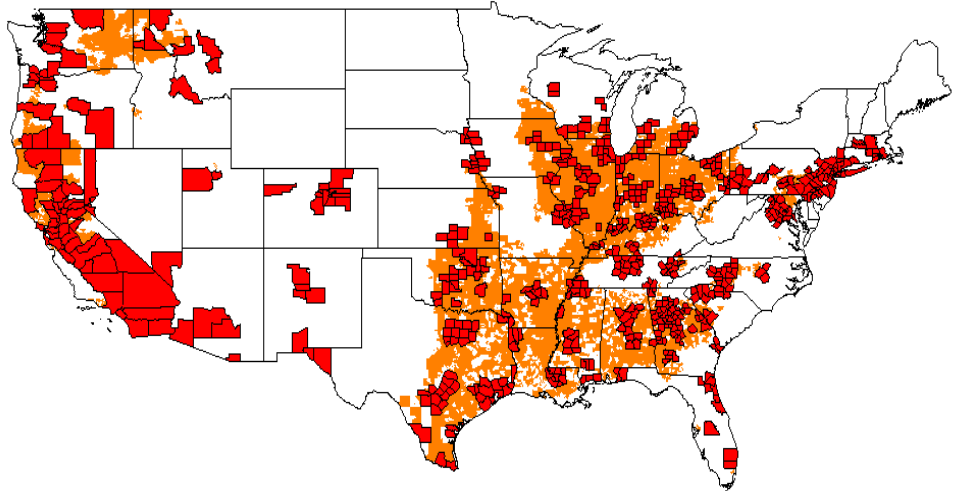
Annual Average PM_{2.5} Concentration > 10 µg/m³



Annual Average PM_{2.5} Concentration > 9 µg/m³



Annual Average PM_{2.5} Concentration > 8 µg/m³





QUALITY OF LIFE AND ECONOMIC IMPACTS OF PROPOSED RULE

If EPA unnecessarily lowers PM NAAQS, these unwarranted regulations could:

- Force businesses of all sizes to navigate additional layers of bureaucracy and red tape to satisfy added permitting requirements, such as costly controls and emission mitigation requirements.
- Prevent communities from improving aging infrastructure such as highways or waste treatment facilities.
- Hurt jobs and the economy by imposing unachievable emission reduction requirements across the nation.
- Affect or restrict daily and recreational activities that produce emissions, such as driving, charcoal grilling, campfires, wood burning fireplaces, and agricultural activities.
- Overall, stricter standards aren't justified from a health perspective and are not needed to continue air quality progress that's being made under current standards. In fact, it stymies industry's progress towards increasing oil and natural gas production to secure and regain control of U.S. energy future.