

# EPA's Review of the Ozone NAAQS

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# Agenda

- Overview of EPA's Proposed Rule
- Discussion of the Costs: EPA's v. Reality
- Advocacy
- Q/A

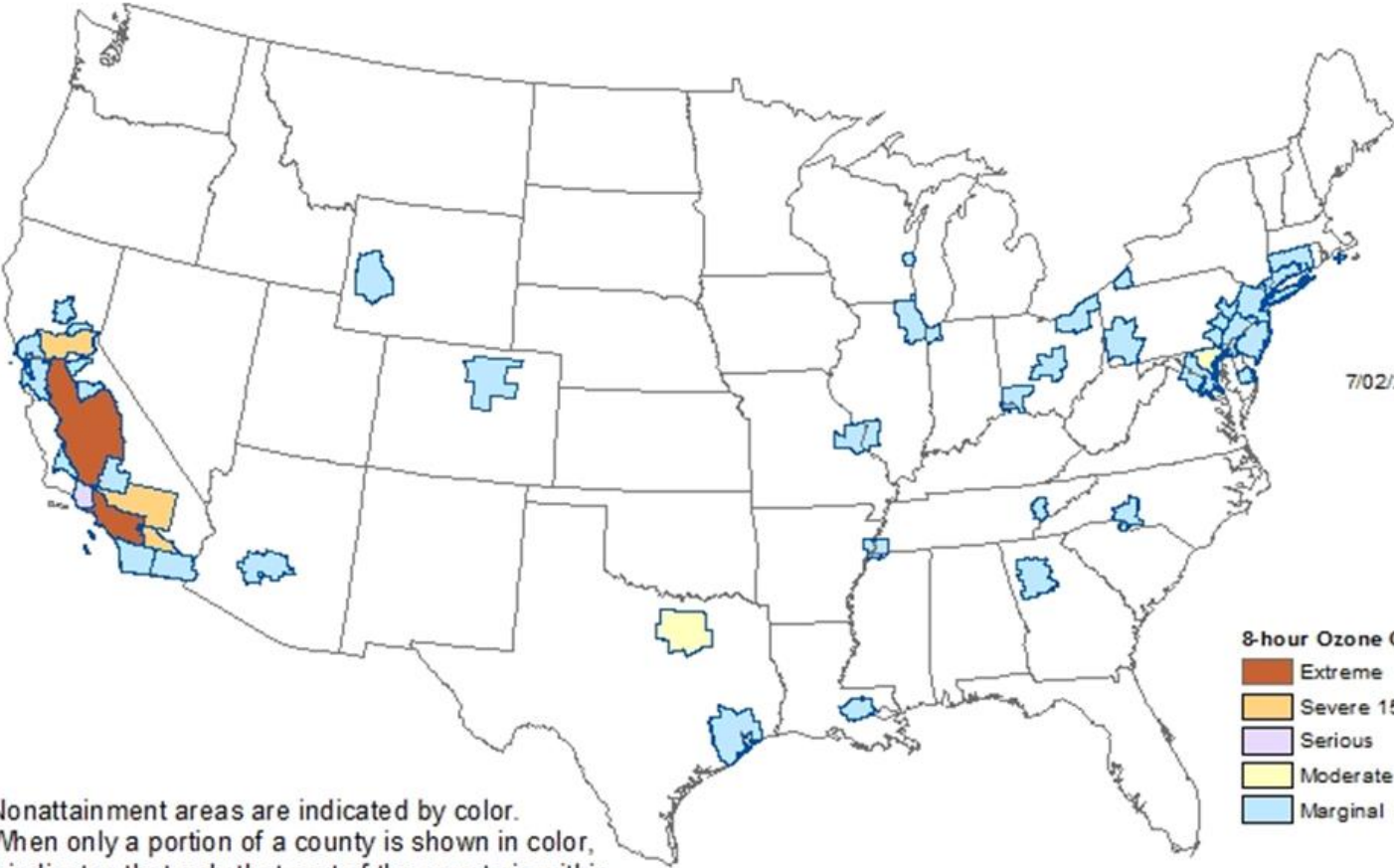


# EPA Proposed Tightening National Ambient Air Quality Standard (NAAQS) for Ozone

- Ground-level ozone, often referred to as smog, forms when Nitrogen Oxides (NOX) and Volatile Organic Compounds (VOCs) interact with sunlight
- 5-year deadline for reviewing the ozone NAAQS was March 2013
- Nov. 26, 2014 EPA proposed tightening standard from 75 parts per billion (ppb) to between 65 – 70 ppb
  - Accepting comments down to 60 and up to 75
- 90-day comment period
- Final rule October 1, 2015
- Likely the most expensive regulation ever



# 8-Hour Ozone Nonattainment Areas (2008 Standard)



Nonattainment areas are indicated by color. When only a portion of a county is shown in color, it indicates that only that part of the county is within a nonattainment area boundary.

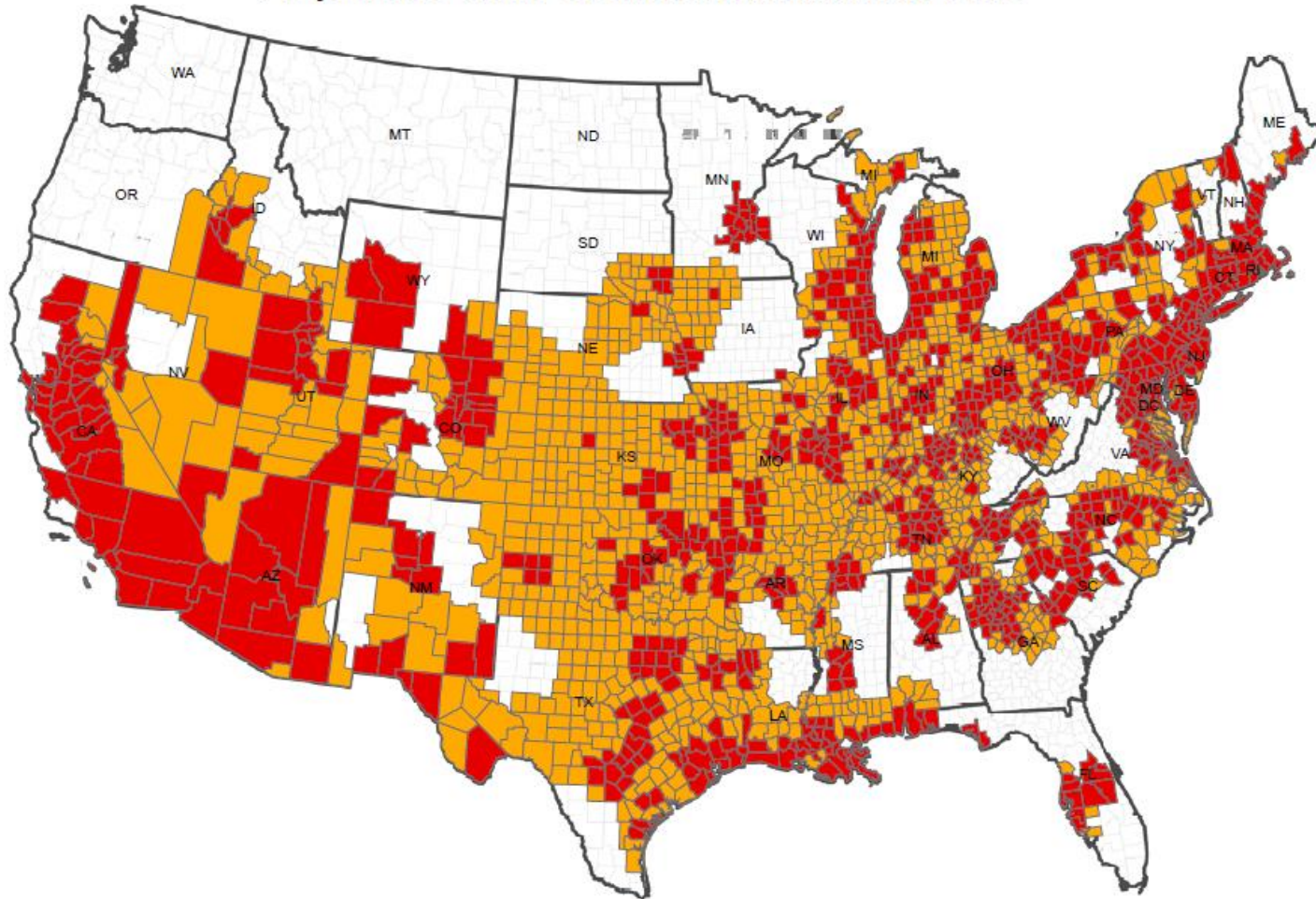
Source: Environmental Protection Agency





# Nonattainment at 65 ppb

Projected 8-Hour Ozone Nonattainment Areas

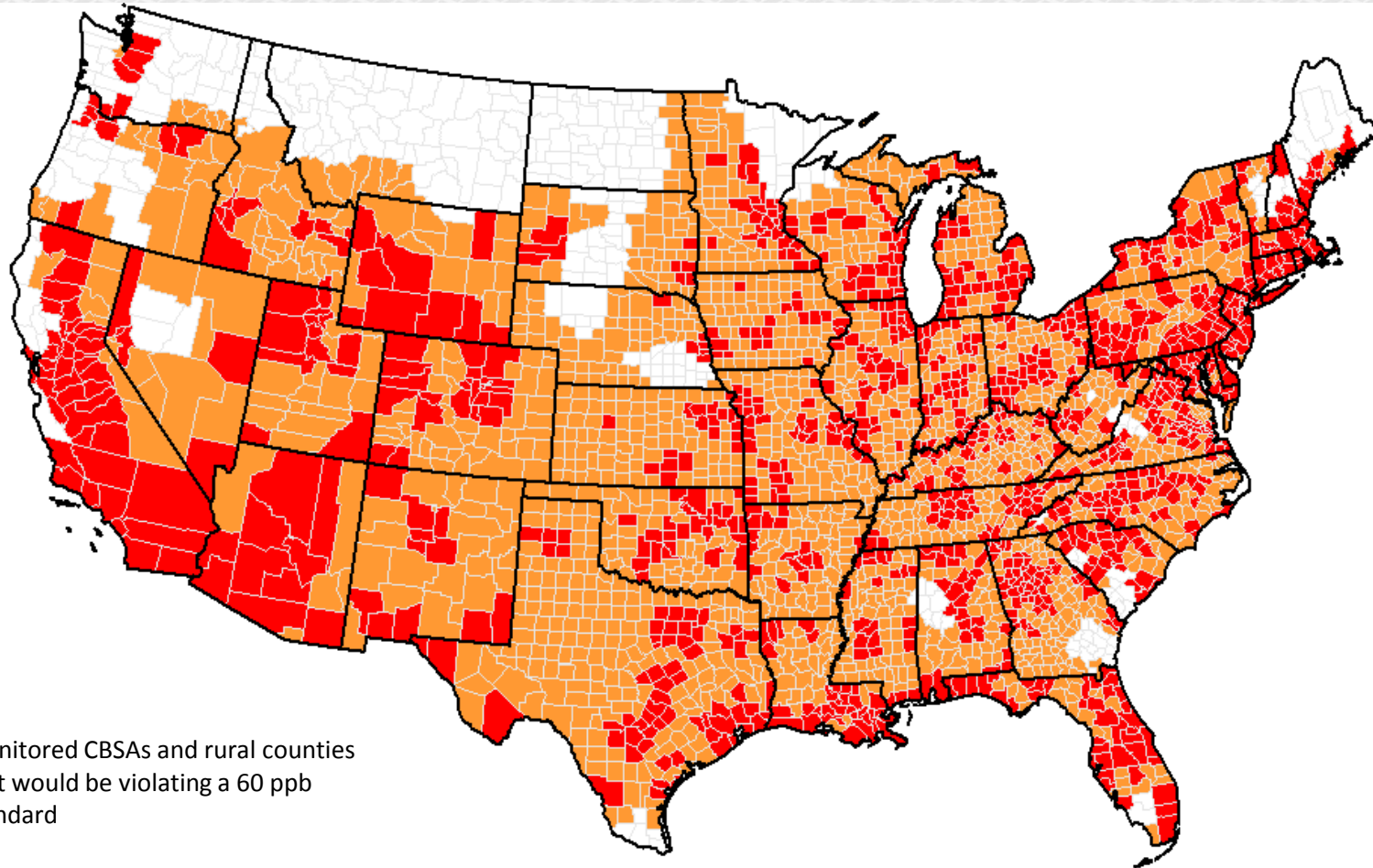



- Monitored CBSAs and rural counties that would be violating a 65 ppb standard
- Unmonitored areas that are anticipated to violate a 65 ppb standard based on spatial interpolation


Based on a survey period 2011-2013

Based on 2011-2013 data accessed from <http://www.epa.gov/airtrends/> and <http://www.epa.gov/airdata/> on 6/2/2014

# Nonattainment at 60 ppb



 Monitored CBSAs and rural counties that would be violating a 60 ppb standard

 Unmonitored areas that have estimated ozone levels that would be violating a 60 ppb standard (based on spatial interpolation)

Based on 2011-2013 data accessed from <http://www.epa.gov/airtrends/> and <http://www.epa.gov/airdata/> on 6/2/2014



## Potential Impacts of New Ozone Regulation Analysis Performed by NERA Economic Consulting (60 ppb)

- Reduce U.S. GDP by \$270 billion per year and as much as \$3.4 trillion over the period from 2017 to 2040;
- Result in 2.9 million fewer job-equivalents per year on average through 2040;
- Cost the average U.S. household \$1,570 per year in the form of lost consumption;
- Retirement of 101 GW of Coal-Fired Capacity
- Increase natural gas costs up to 52% and electricity up to 23%

# Most Expensive Regulation of All Time

EPA **2025** Compliance Cost Estimate 2014 Proposed Rule

Ozone Standard	Cost Estimate in 2025
70 ppb	\$3.9 billion
65 ppb	\$15 billion
60 ppb	\$39 billion

Source: EPA Proposed Ozone Rule, RIA (Nov. 2014)

Comparison of **Total** Cost Estimates EPA 2011 v. NERA Economic Consulting (2017 – 2040)

EPA Cost Estimate 60 ppb	NERA Economic Consulting 60 ppb
~\$900 Billion	\$2.2 Trillion

Source: EPA 2011 Ozone RIA and NERA Economic Consulting July 2014 Study





# Why EPA's \$15 Billion/Year Vastly Underestimates the True Costs of 65 ppb

- Only considers counties that are currently monitored – ***excludes ~76% of U.S. counties***
- Includes emission reductions from ***proposed*** Clean Power Plan
- Does not consider costs of states attaining standard ***before 2025***
- ***Excludes*** California
- Assumes ***unknown controls are less expensive*** than known controls (\$/ton).





# Final Thoughts on Ozone Regulation

- Parts of the country and industries that traditionally have not had ozone issues, will have new and increased compliance burdens
- Costs slope upwards as the ozone standard is lowered – little low hanging fruit
- Congress will get engaged; states will get engaged; end-game is getting Administration to land at a reasonable place





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# The NAM Agenda



**Goal 1:** The United States will be the best place in the world to manufacture and attract foreign direct investment.

**Goal 2:** Manufacturers in the United States will be the world's leading innovators.

**Goal 3:** The United States will expand access to global markets to enable manufacturers to reach the 95 percent of consumers who live outside our borders.

**Goal 4:** Manufacturers in the United States will have access to the workforce that the 21st-century economy demands.

