

# Gradient Corporation



## CLIENT ALERT

### National Ambient Air Quality Standard for Lead to Decrease Dramatically

On October 16, the U.S. EPA announced a revised National Ambient Air Quality Standard (NAAQS) for lead of 0.15  $\mu\text{g}$  lead /  $\text{m}^3$  air. The new standard is a factor of 10 below the existing standard. EPA will require that all areas reach attainment by 2017, but many areas will be required to reach attainment before then. Areas with current air lead levels demonstrably above the new NAAQS may have as little as two to three years to reduce air lead levels to the new NAAQS.

Attainment with the new standard can be demonstrated with three years of air monitoring data for lead measured in total suspended particulate with a continuous three month rolling average below the revised level. This dramatic reduction in the lead NAAQS came about as a result of a large body of recent health studies and epidemiology literature suggesting that neurocognitive deficits (IQ loss) in young children occurs at much lower blood lead levels than previously understood.

Most areas of the U.S. have long been in attainment with the existing standard of 1.5  $\mu\text{g}/\text{m}^3$ , and the previous monitoring network has been largely dismantled. EPA is now calling for implementation of a new monitoring network, which will include:

- Source-oriented monitors at the point of maximum off-site impact for all facilities with lead emissions above **1 ton per year (tpy)**, and
- Non-source oriented monitors in areas with a population over 500,000.

Industries that may be the most affected by the new NAAQS include lead and copper smelters, coal-fired power plants, solid waste and hazardous waste incinerators, and some manufacturers of ceramics, glassware, synthetic rubber and other chemicals. Facilities who believe their lead emissions contribute to an air lead level at the point of maximum impact of less than 0.075  $\mu\text{g}/\text{m}^3$  can use air dispersion modeling to demonstrate that monitoring of their facility is not needed.

How does the new NAAQS affect you?

For questions or concerns on the new lead NAAQS, contact:

[Teresa S. Bowers, Ph.D.](mailto:tbowers@gradientcorp.com)  
Principal  
[tbowers@gradientcorp.com](mailto:tbowers@gradientcorp.com)

[Barbara D. Beck, Ph.D. DABT](mailto:bbeck@gradientcorp.com)  
Principal  
[bbeck@gradientcorp.com](mailto:bbeck@gradientcorp.com)

[Rosemary Mattuck, M.S.](mailto:rmattuck@gradientcorp.com)  
Senior Environmental Engineer  
[rmattuck@gradientcorp.com](mailto:rmattuck@gradientcorp.com)



Gradient Corporation  
20 University Road  
Cambridge, MA 02138  
Phone: 617-395-5000  
[www.gradientcorp.com](http://www.gradientcorp.com)

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- Have you monitored for lead in the past and stopped because air leads in your area were below the NAAQS?
- Do your raw materials contain lead?
- Can you quantify your lead emissions, from both stack and fugitive sources?
- Are you likely in a non-attainment area due to other nearby sources? If so, you may also be the focus of a State Implementation Plan (SIP) even if your emissions are below the 1 tpy threshold for monitoring in the new Rule.
- If your lead emissions are over 0.5 tpy and you are in a designated non-attainment area, your facility will be required to report emissions to the National Emissions Inventory (NEI) and conduct an analysis of Reasonably Available Control Technology (RACT). You may also want to develop an air dispersion model to assess your need for an air monitor.

What should you do now?

- Review your emissions inventory for lead and assess whether the new standard may affect you.
- Learn whether there are other sources of lead emissions in your area such that collectively you may contribute to a non-attainment designation.
- Update or perform air dispersion modeling to assess your need for a monitor.

Please feel free to contact us to discuss any questions or concerns about the new lead NAAQS.

