

2024 NAAQS Revisions: Review and Discussion

Air Quality Client Contact Meeting
November 12, 2025

National Ambient Air Quality Standards

- Maximum permissible pollutant concentration limits (in ambient air)
 - Set by EPA for six criteria pollutants: O₃, PM, SO₂, NO₂, CO, and Pb
 - Primary standards – set to protect public health
 - Secondary standards – set to protect public welfare (examples [not exhaustive]: effects on soils, water, crops, vegetation, man-made materials, wildlife, and visibility)
 - Clean Air Act (CAA) mandates that EPA review each NAAQS every 5 years
- A NAAQS revision triggers certain mandatory actions (per CAA)
 - Designations process (attainment, nonattainment, & unclassifiable areas)
 - State Implementation Plan (SIP) revisions (Infrastructure SIPs)
- Iowa Code contains an additional requirement for DNR

HF2418 (2010) – IA Code 455B.134(14)

- After a NAAQS revision, DNR must:
 - Convene stakeholder meetings (by June 1 of 2nd calendar year after revision)
 - To review emission limitations or standards relating to the maximum quantities of air contaminants that may be emitted from air contaminant sources
 - Submit a report to the Governor & Generally Assembly (by Nov 1 of that year)
 - Recommendations for law changes necessary to attain that NAAQS
- Historically, if rule revisions were needed, they might involve:
 - Construction permitting exemptions – [567 IAC 22.1\(2\)](#)
 - Permit by rule requirements – [567 IAC 22.8\(1\)](#)
 - Title V insignificant activities – [567 IAC 24.103\(2\)](#)

Recent (2024) NAAQS Revisions: PM_{2.5}

- EPA strengthened the annual primary standard
 - Lowered from 12.0 to 9.0 $\mu\text{g}/\text{m}^3$ (3-year average)
 - Promulgated Feb 7, 2024
- All applicable Iowa monitors currently (2022-2024) meet the standard
 - Governor recommended each county be designated attainment
- EPA is planning to revisit the 2024 decision (no other details known)
 - DNR tabling this review given the uncertainty
 - Stakeholders still welcome to submit suggestions for code or rule changes

Recent (2024) NAAQS Revisions: SO₂

- EPA added a new annual secondary SO₂ standard of 10 ppb (3-yr avg)
 - To protect sensitive [aquatic] ecosystems from acidification
 - EPA retained the existing (1971) 0.5 ppm 3-hour secondary standard
- IA's monitored SO₂ design values (2022-2024) meet the new standard
 - Governor will recommend each county be designated attainment
- EPA not reconsidering this NAAQS; stakeholder discussion needed
 - Implementation requirements the same as primary NAAQS
 - (Except attainment deadlines are not fixed: "as expeditiously as practicable")

2024 Secondary SO₂ NAAQS Revision

- Implementation Timeline

Item	Date	Notes
NAAQS promulgated:	Dec 11, 2024	Published Dec 27, 2024 (89 FR 105692)
Effective date:	Jan 27, 2025	PSD applies (1-hr “surrogate” memos)
State designation “ask” due:	Dec 11, 2025	Will recommend attainment
HF2418 meetings due:	Jun 1, 2026	Addressing today (and next time)
HF2418 report due:	Nov 1, 2026	
EPA designations due:	Dec 11, 2026	EPA can take an additional year
Infrastructure SIP due:	Dec 11, 2027	Show Iowa can administer NAAQS (minor NSR permitting deadline)

Stakeholder Discussion

- For the new (2024) 10 ppb annual secondary SO₂ NAAQS:
 - DNR has not identified any changes needed to Iowa code or DNR rules for purposes of HF2418 / [455B.134\(14\)](#)
 - 2010 1-hour SO₂ standard (75 ppb) largely protective of new standard
- Do you have suggestions for revisions to laws, rules, forms, or guidance?
 - Feel free to provide now, or
 - Email matthew.johnson@dnr.iowa.gov, or
 - Bring to the May 2026 AQ CC meeting
- Questions?