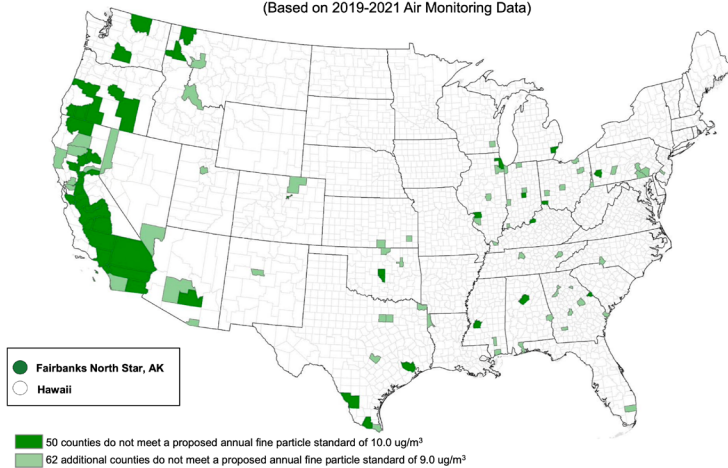


## THE EPA'S MAP SIGNIFICANTLY UNDERESTIMATES THE NONATTAINMENT IMPACT OF ITS PROPOSED PM<sub>2.5</sub> STANDARDS

### Current Air Monitoring Data from EPA Show Some Counties Would Not Meet Proposed Primary Fine Particle Standards

(Based on 2019-2021 Air Monitoring Data)

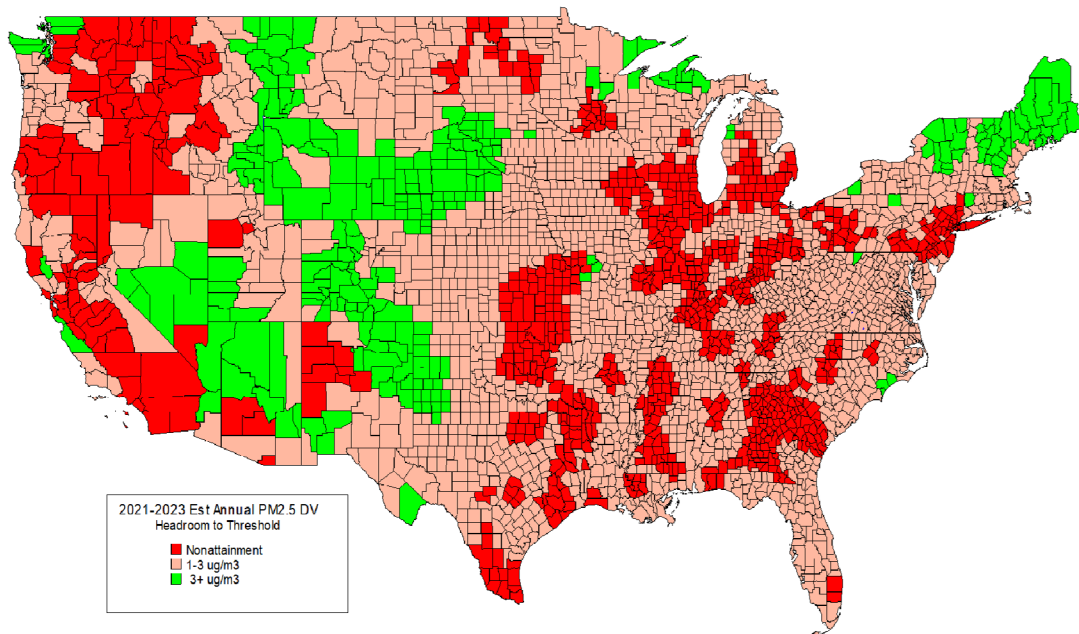


Note: Map reflects monitored counties with complete monitoring data. See accompanying table for more detail. Future area designations (attainment/nonattainment) will not be based on these data, but likely on monitoring data collected between 2021 and 2024. Of the 112 counties with 2019-2021 design values above 9 ug/m<sup>3</sup>, 24 counties are totally or partially contained in nonattainment areas for the current PM<sub>2.5</sub> standards.

This information is provided for illustrative purposes only and is not intended to project or predict the outcome of any forthcoming designations process.

- Does not reflect the EPA's own five-factor guidance for making designations
- Excludes surrounding counties in the metropolitan area that are likely to be included
- Omits more recent data (2022 and 2023) showing 60 additional monitors above proposed levels
- Does not indicate the impacts to attainment areas of diminished headroom needed to build new projects or new manufacturing plants
- Excludes the impact of new monitors, including near-road monitors, on number of nonattainment areas

Taking these factors into account, the following map more accurately depicts likely nonattainment designations and permitting impacts across the U.S. economy at 9 ug/m<sup>3</sup>\*



\*See EPA's Proposed Air Quality Standards Will Cause Permitting Gridlock Across Our Economy (November 2023), available at <https://www.globalenergyinstitute.org/sites/default/files/2023-11/Chamber%20PM2.5%20Report%20-%2011.8.23%20Final%20Draft.pdf>