

ClearView

Air Managers Committee/State Caucus

Regional Haze/WRAP Activity Update
February-March, 2006

Planning Team Reviews WRAP Projects, Begins work on 2007 Workplan and Strategic Plan

The WRAP Planning Team membership consisting of co-chairs of the WRAP forums and workgroups, meets once or twice per year for a comprehensive assessment of near-term work products and to establish a broad outline of each year's workplan. The meeting in early February was different than previous meetings in that **funding support of RPO work on regional haze has been sharply reduced in the last year, and the WRAP will be finishing the contracted work for the 2007 round of regional haze plans with essentially the funding that is in hand.**

It looks like that is achievable. However several large questions must be dealt with in the next several months:

Essential work-plan elements needed to complete the regional technical and policy support;
Level and sources of support for the ongoing infrastructure needed for implementation of the regional haze plans, e.g.

- Emission Data Management System (EDMS)
- VIEWS (Monitoring data from the IMPROVE network)
- Fire Tracking (required under 309-needed for reasonable progress tracking)
- Technical Support System (updated as needed-used to support control strategies)

NOTE: The proposed reductions in RPO funding are among other Administration proposals for significant reductions in federal support of state air programs.

EDMS beta Test results under review-Refinements and Enhancements Underway

The EDMS workgroup is working with the contractor to repair bugs and enhance utility of the system. The EDMS is designed for continuing update of emissions data, as the National Emissions Inventory (NEI) is updated. Submittals to NEI and EDMS will be in the same format, to lessen duplication. EDMS will compile emissions data as submitted by

air agencies, into a variety of tabular and GIS formats oriented to meet regional haze emissions tracking and analysis functions.

Stationary Sources Joint Forum Working toward direction for 309 and 308

A general consensus has emerged that individual BART analyses will be needed to show compliance with BART requirements, regardless of which path may be chosen by each state and tribe. The choices are individual analyses to identify stationary sources subject to BART, or to participation in an alternative, "Better than BART" program. States and tribes are considering what assistance they may need from the Regional Modeling Center, either to perform the individual analyses, or to help reduce methodology conflicts among states and tribes that perform the modeling themselves. In any case, the cumulative benefits calculated using individual analyses need to be compiled and integrated into a showing of Reasonable Progress. Consultation among states and tribes is essential for this to succeed.

Comments on EPA proposed rulemakings, for PM NAAQS, Implementation and Monitoring

Many of the state and tribal WRAP members are preparing to submit comments on EPA's proposals for PM NAAQS revisions and changes to national monitoring strategies. Most of the members' comments on the PM NAAQS focus on opposition to:

- Definition of PM_{coarse} as...Any mix of PM_{10-2.5} that is **dominated** by Resuspended **dust from high-density traffic on paved roads and PM generated by industrial sources and construction sources**;
- **Excluding** any ambient mix of PM_{10-2.5} that is dominated by **rural windblown dust and soils and PM generated by agricultural and mining sources**;
- **Exempting agricultural and mining sources** from control measures to meet the NAAQS.

The proposed transition plan is to:

- **Revoke** the current annual and 24-hour **PM₁₀ NAAQS**, **except** in PM₁₀ non-attainment areas over **100,000** population (retaining 24-hour only) and;
- **Adopt** the **PM_{10-2.5} 24-hour NAAQS** of 70ug/m³.

This has the practical effect of not having a 24-hour PM_{coarse} NAAQS applicable to less populated areas (no annual NAAQS.)

The proposed national monitoring strategy for PM supports the NAAQS proposal with siting criteria that would emphasize PM_{coarse} air monitoring only in the populated areas over 100,000 population. Two states, Hawaii and Wyoming, and none of the tribes in the west would site PM_{coarse} samplers or PM₁₀ surrogate samplers within their areas of jurisdiction under these proposed revisions.

Some comments take note of the EPA proposals being contrary to the recommendations of CASAC. Comments are due before April 17, 2006.

Second Informational Workshop Scheduled

Planning is underway for a second WRAP workshop that presents “what we know” about each of the visibility-impairing air contaminants and how the information can be used to develop regional haze plans and demonstrate reasonable progress. The next workshop will focus on dust, carbon and fire. It is scheduled for Sacramento CA, on May 23-24. See: www.wrapair.org/cal/calendar.php?op=view&id=505 for the preliminary agenda and hotel accommodation information.

2004 Regional SO₂ Emission and Milestone Report Finalized

This is an annual report required of the 309 states to track progress on meeting the SO₂ emission reduction milestones. The report indicates that the reductions exceed (emissions are lower than) the projected milestones by about 25% for the average 2003-2004 reporting year. The report can be viewed at: [PDF](#) or [DOC](#)

Attribution of Haze II/Technical Support System (AofH/TSS) Make progress

Planning is underway for a hands-on training session for state and tribal planners to introduce them to elements of the Technical Support System (TSS), the data sets under development, and application of “Weight of Evidence” methodologies to support regional haze plans. This training is scheduled for Seattle, WA, on April 27, following the Attribution of Haze Workgroup meeting, April 25-26. For preliminary agenda and hotel accommodations see: <http://www.wrapair.org/cal/calendar.php?op=view&id=522>.