



2007 Regional Haze Plans in the WRAP Region - Technical Support System Background Tom Moore – March 24, 2006

(major selections borrowed from Tom Webb, EPA Region IX, January 2006 draft)

Goals & Objectives

The shared goal of the state and federal agencies, in planning and coordinating their activities, is to produce effective regional haze implementation plans from states and EPA regional offices that meet all federal requirements, fully utilize the WRAP organizational structure and approach, and are based on regional technical data collection and analysis. A number of important objectives in support of this goal are outlined below.

Environmental Protection

- RH plans ensure reasonable progress to improve visibility in all western class I areas;
- RH plans are legally defensible, federally enforceable and consistent with applicable legal requirements; and
- RH plans do not set a negative legal precedent in any area.

Regional Collaboration

- RH plans reflect collaboration with other states, tribes, and federal agencies;
- RH plans reflect results of consultative process with FLMs;
- RH plans reflect inter-state agreement on reasonable progress goals and respective contributions to reasonable progress; and
- The individual RH plan development and review process is an efficient use of resources.

Regional Consistency

- RH plans incorporate WRAP products, strategies and control measures;
- RH plans have consistent technical support documentation;
- RH plans have coordinated goals and strategies for a given Class I area;
- States identify early on where RH plans deviate from model rules and templates;
- FLMs are consistent in reviewing and commenting on RH plans; and
- EPA regional offices are consistent in evaluating and acting on RH plans.

Definitions

Reasonable Progress Goals: “In developing each reasonable progress goal, the State must consult with those States which may reasonably be anticipated to cause or contribute to visibility impairment in the mandatory Class I Federal area. In any situation in which the State cannot agree with another such State or group of States that a goal provides for reasonable progress, the State must describe in its submittal the actions taken to resolve the disagreement. In reviewing the State’s implementation plan submittal, the Administrator will take this information into account in determining whether the State’s goal for visibility improvement provides for reasonable progress towards national visibility conditions” (51.308(d)(1)(iv)).

Long-Term Strategy: “Where the State has emissions that are reasonably anticipated to contribute to visibility impairment in any mandatory Class I Federal area located in another State or States, the State must consult with the other State(s) in order to develop coordinated emission management strategies. The State must consult with any other State having emissions that are reasonably anticipated to contribute to visibility impairment in any mandatory Class I Federal area within the State” (51.308(d)(3)(i)).

State and Federal Land Manager Coordination: The State must provide the Federal Land Manager with an opportunity for consultation, in person and at least 60 days prior to holding any public hearing on an implementation plan (or plan revision) for regional haze required by the subpart” (51.308(i)(2)). This consultation includes the opportunity to discuss:

- Assessment of visibility impairment in any mandatory Class I area;
- Recommendations on the development of Reasonable Progress Goal; and
- Recommendations on implementation of strategies to address visibility impairment.

Further, a State must include in its SIP a description of how the State addressed any comments provided by the FLMs (51.308(i)(3)). The SIP must also include procedures for continuing consultation between the State and FLMs on implementation of visibility protection program, including development and review of SIP revisions and 5-year progress reports, and any other program having potential to contribute to visibility impairment in Class I areas (51.308(i)(4)).

Concepts for Collaboration on Regional Haze Implementation Plans

Key Requirements: For each Class I area, or cluster of areas, states, in consultation with their federal and tribal partners, should agree on four key regional haze planning requirements: 1) Visibility Conditions; 2) Sources and Control Strategies; 3) Reasonable Progress Goal; and 4) Long-Term Strategy. Reaching agreement on these requirements (i.e., an area’s planning profile) would form the basis for a consensus regarding a state’s plan. See *Class I Area Profile* for a more detailed outline of the key requirements (Appendix A).

Targeted Approach: A targeted approach should focus on those areas impacted by emissions from more than one state. These areas are likely the most complex and contentious due to the number of parties involved in the negotiations, and number of sources of haze. Among these areas, some are potentially more critical than others depending on whether additional control measures are needed or perhaps more in-depth analysis of the situation.

Criteria: In addition to multi-state impacts, other unique Class I areas, or clusters of areas, may require special consideration. Additional criteria may include areas where the haze has unique characteristics due to chemical composition, unusual sources, complex meteorology, or other unusual factors. In cases where a Class I area appears to have singular issues, regulatory parties may want to conduct separate negotiations or group similar yet independent areas together to ensure a consistent approach.

Thresholds: A possible step in developing a list of areas with multi-jurisdictional or state impacts is reaching agreement on a threshold level of a state’s contribution to haze. While the rule does not specify levels of impact for this purpose, parties may want to negotiate an agreed upon level of emissions or a percentage of deciviews to determine a state’s involvement in the plan for a particular Class I area.

Process Management: States, tribes, and federal members of the WRAP need to define clearly the roles and responsibilities of all participants in this collaborative process. These participants include regulatory parties, various WRAP work groups and committees, and the services of the WRAP co-chairs – Western Governors Association and National Tribal Environmental Council.

Schedule (first draft March 2006)

2006 – Develop Support Information and Regional Haze Plan Draft

Supporting Information and Documents

- State & Federal Protocol
- §308 SIP Template
- §309 Strategy
- Regional Technical Support Information Resources and Documentation
- Policy documents
- Policy and technical tools

Class I Area Profiles [Appendix A]

- Visibility conditions
- Sources of haze
- Pollutant mix
- Reasonable progress goals
- Visibility benefits from existing/known sources
- Areas impacted by one state
- Areas impacted by more than one state
- Applicable control strategies

State Obligations

- BART determinations
- Alternative programs for SO₂ or NO_x
- Emission reduction obligations by state and area
- Negotiation of emission budget discrepancies
- Regional review of program effectiveness

2007 – Review Draft Regional Haze Plans

- States request preliminary review by EPA and FLMS
- EPA and FLMS complete review (regional, state by state, area by area)
- States address federal comments
- States conduct public notice and review
- States revise plans
- States adopt plans
- States submit plans to EPA

Appendix A

Class I area Profile

March 2006 version

Visibility Conditions (for most and least impaired days)

- Establish current/baseline visibility conditions;
- Determine natural background visibility conditions;
- Project visibility conditions in 2018 (based on existing and known control programs); and
- Calculate number of deciviews by which baseline conditions exceed natural conditions.

Sources and Control Strategies

- Identify man-made emissions sources of haze;
- Develop control measures;
- Evaluate sources to control based on four factors;
- Identify the likely emission reductions and range of visibility improvement;
- Determine what measures are reasonable; and
- Consider trading program for SO₂ and NO_x.

Reasonable Progress Goal

- For each WRAP region Class I area, calculate the uniform rate of progress (glide path) from monitored 2000-04 baseline conditions for each IMPROVE light extinction species (Mm^{-1}) and the associated total visibility metric (deciviews) to default natural light extinction species and natural visibility conditions in 2064;
- Calculate the likely range of visibility conditions in 2018 (based on analyses of monitoring data, emissions projections estimates assessing existing, known and planned controls, and integrating modeling results);
- Assess additional source categories and controls if appropriate;
- For each WRAP region Class I area, set a 2018 reasonable progress goal for each IMPROVE light extinction species (Mm^{-1}) and the associated total visibility metric (deciviews); and
- Explain the relationship of each 2018 Reasonable Progress Goal selected for individual Class I areas to uniform rate of progress number above.

Long-Term Strategy

- Identify Class I areas for which more than one state is “reasonably anticipated to contribute to visibility impairment”;
- Identify states which have an obligation to reduce emissions in those Class I areas;
- Agree on state apportionment of emission reduction obligations;
- Coordinate emission management strategies to achieve Reasonable Progress Goals;
- Include in SIP all measures necessary to obtain share of emission reductions; and
- Assess IMPROVE network, identify needed modifications, and adopt a monitoring strategy covering each Class I area through 2018.