

PREFACE

In 2004 the Western Regional Air Partnership's (WRAP) Dust Emissions Joint Forum (DEJF) selected Countess Environmental to prepare a fugitive dust handbook and an associated website (www.wrapair.org/forums/dejf/fdh) for accessing the information contained in the handbook. The material presented in the original handbook released on November 15, 2004 addressed the estimation of uncontrolled fugitive dust emissions and emission reductions achieved by demonstrated control techniques for eight major fugitive dust source categories. In 2006 WRAP hired Countess Environmental to update the handbook. The updates included revising each chapter in the handbook to reflect the new PM_{2.5}/PM₁₀ ratios developed for WRAP by the Midwest Research Institute (MRI) in 2005, addressing four additional major fugitive dust source categories as well as several minor source categories, and updating the existing chapters.

The material in this handbook focuses on fugitive dust emissions “at the source” and does not evaluate factors related to the transport and impact of emissions on downwind locations where ambient air monitoring occurs. The methods for estimation of dust emissions rely primarily on AP-42 with additional references to alternative methods adopted by state and local control agencies in the WRAP region. With regard to emission factor correction parameters, source extent/activity levels, control efficiencies for demonstrated control techniques, and emission reductions by natural mitigation and add-on control measures, sources of data are identified and default values are provided in tables throughout the handbook. Graphs, charts, and tables are provided throughout the handbook to assist the end user.

The handbook:

- (a) compiles technical and policy evaluations for the benefit of WRAP members, stakeholders, and other interested parties when addressing specific air quality issues and when developing regional haze implementation plans;
- (b) incorporates available information from both the public (federal, state and local air quality agencies) and private sectors (e.g., reports addressing options to reduce fugitive dust emissions in areas of the country classified as nonattainment for PM₁₀); and
- (c) serves as a comprehensive reference resource tool of currently available technical information on emission estimation methodologies and control measures for the following twelve fugitive dust source categories: agricultural tilling, agricultural harvesting, construction and demolition, materials handling, paved roads, unpaved roads, mineral products industry, abrasive blasting, livestock husbandry, and windblown dust emissions from agricultural fields, material storage piles, and exposed open areas.

This handbook is not intended to suggest any preferred method to be used by stakeholders in preparation of SIPs and/or Conformity analyses but rather to outline the most commonly adopted methodologies currently used in the US. The information contained in this handbook has been derived from a variety of sources each with its own

accuracy and use limitations. Because many formulae and factors incorporate default values that have been derived for average US conditions, area specific factors should be used whenever they are available. Additionally, the input terms (commonly referred to as “correction factors”) used in any given emission factor equation presented in this handbook were obtained using a specific test methodology and are designed to give an estimate of the emission from a specific activity or source under specific conditions. As a result the emission estimate must be used appropriately in any downstream application such as dispersion modeling of primary PM emissions.

It is important to note that EPA’s criteria for exceedances, violations, and model calibration and validation are based on ambient data from the National Ambient Air Monitoring Sites. It should be further noted that estimates of the relative contribution of fugitive dust to ambient PM concentrations based on chemical analysis of exposed filters are usually much lower than that based on emission inventory estimates, in some cases by a factor of 4. Part of this discrepancy between ambient measurements and emission estimates is due to the near source deposition losses of freshly generated fugitive dust emissions. It is not an objective of this handbook to resolve this modeling discrepancy issue. It is the role of modelers to incorporate deposition losses into their dispersion models and to account for the formation of secondary PM, which in many areas of the country are responsible for an overwhelming contribution to exceedances of the federal PM NAAQS.

Applicability to Tribes

The Regional Haze Rule explicitly recognizes the authority of tribes to implement the provisions of the Rule, in accordance with principles of Federal Indian law, and as provided by the Clean Air Act §301(d) and the Tribal Authority Rule (TAR) (40 CFR §§49.1– .11). Those provisions create the following framework:

1. Absent special circumstances, reservation lands are not subject to state jurisdiction.
2. Federally recognized tribes may apply for and receive delegation of federal authority to implement CAA programs, including visibility regulation, or "reasonably severable" elements of such programs (40 CFR §§49.3, 49.7). The mechanism for this delegation is a Tribal Implementation Plan (TIP). A reasonably severable element is one that is not integrally related to program elements that are not included in the plan submittal, and is consistent with applicable statutory and regulatory requirements.
3. The Regional Haze Rule expressly provides that tribal visibility programs are “not dependent on the strategies selected by the state or states in which the tribe is located” (64. Fed. Reg. 35756), and that the authority to implement §309 TIPs extends to all tribes within the GCVTC region (40 CFR §51.309(d)(12).
4. The EPA has indicated that under the TAR tribes are not required to submit §309 TIPs by the end of 2003; rather they may choose to opt-in to §309 programs at a later date (67 Fed. Reg. 30439).

5. Where a tribe does not seek delegation through a TIP, EPA, as necessary and appropriate, will promulgate a Federal Implementation Plan (FIP) within reasonable timeframes to protect air quality in Indian country (40 CFR §49.11). EPA is committed to consulting with tribes on a government-to-government basis in developing tribe-specific or generally applicable TIPs where necessary (see, e.g., 63 Fed. Reg.7263-64).

It is our hope that the findings and recommendations of this handbook will prove useful to tribes, whether they choose to submit full or partial 308 or 309 TIPs, or work with EPA to develop FIPs. We realize that the amount of modification necessary will vary considerably from tribe to tribe and we have striven to ensure that all references to tribes in the document are consistent with principles of tribal sovereignty and autonomy as reflected in the above framework. Any inconsistency with this framework is strictly inadvertent and not an attempt to impose requirements on tribes which are not present under existing law.

Tribes, along with states and federal agencies, are full partners in the WRAP, having equal representation on the WRAP Board as states. Whether Board members or not, it must be remembered that all tribes are governments, as distinguished from the “stakeholders” (private interest) which participate on Forums and Committees but are not eligible for the Board. Despite this equality of representation on the Board, tribes are very differently situated than states. There are over four hundred federally recognized tribes in the WRAP region, including Alaska. The sheer number of tribes makes full participation impossible. Moreover, many tribes are faced with pressing environmental, economic, and social issues, and do not have the resources to participate in an effort such as the WRAP, however important its goals may be. These factors necessarily limit the level of tribal input into and endorsement of WRAP products.

The tribal participants in the WRAP, including Board members, Forum and Committee members and co-chairs, make their best effort to ensure that WRAP products are in the best interest of the tribes, the environment, and the public. One interest is to ensure that WRAP policies, as implemented by states and tribes, will not constrain the future options of tribes who are not involved in the WRAP. With these considerations and limitations in mind, the tribal participants have joined the state, federal, and private stakeholder interests in approving this handbook as a consensus document.