

May 2, 2002

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Office of Transportation and Air Quality
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Dear Mr. Seitz, Mr. McLean and Ms. Oge:

The purpose of this letter is to request emissions inventory improvement assistance from and identify potential areas of collaboration with the Office of Air Quality Planning and Standards, the Office of Transportation and Air Quality and the office of Atmospheric Programs. As part of our duties in the Regional Planning Organization (RPO) process, each RPO is assisting states and tribes to develop plans to reduce visibility impairment across its region. States (and tribes that elect to do so) are required to submit implementation plans to the U.S. Environmental Protection Agency (EPA), under the federal regional haze rule.

Emission inventories will be an essential component of these plans. To prepare the most accurate inventories possible, states will need assistance from EPA on the tasks listed below. A useable, high-quality emissions inventory is needed to adequately understand the sources of regional haze and the relationships between those emissions sources that cause visibility degradation.

We are asking that EPA follow through on their responsibility for the following 4 projects. These projects have three characteristics that make them fit as EPA projects. First, the RPOs do not have access to the data or expertise to accomplish these tasks. Second, they are well-defined projects with a clear product. Third, they have a well-defined delivery date. We would like to stress that these products are very time sensitive, and their timely delivery is critical for the RPOs to accomplish their work:

1. Prepare hour specific and boiler specific CEM records for the years 2001 through 2003 in NEI version 2 format. Release the 2001 data by December 2002, the 2002 data by December 2003, and the 2003 data by December 2004.
2. Release a final regulatory version of the Non-Road Model by December 2002.

3. Develop PM_{2.5} emission factors (as opposed to the percentages of PM₁₀ or TSP currently in use) and publish by December 2003. Prioritize emission factor development based on estimated contribution to total PM_{2.5} emissions.
4. Provide data sets used to calculate the 1999 NEI by October 2002 (in particular, for those source categories listed in Attachment 1) so that states can understand and check the calculations. Numerical values for each variable and the associated reference document citation should be included in the data sets. The Emission Factor and Inventory Group (EFIG) group at OAQPS has expressed a desire to assist the RPOs in obtaining this data, and your support for their efforts would be valuable.

Your assistance in this matter is greatly appreciated and will provide a tremendous benefit to all of the participants in the RPO process across the nation. We look forward to your timely response to our requests. If you have any questions concerning this request for assistance please contact these technical coordinators at these RPOs: Mark Janssen, Midwest RPO (847-296-2184); Ray Malenfant, MANE-VU/State of Delaware (302-739-4791); or Tara Marie Kully, MANE-VU/MARAMA (410-467-0170).

Thank you for your efforts.

Sincerely,

The Regional Planning Organization Directors

Larry Byrum
Central Regional Air Planning Association

Bruce Carhart
Mid-Atlantic/Northeast Visibility Union

Patrick Cummins
Co-Director, Western Regional Air Partnership

Bill Grantham
Co-Director, Western Regional Air Partnership

John Hornback
Visibility Improvement State and Tribal
Association of the Southeast

Mike Koerber
Midwest Regional Planning Organization

cc: David Mobley, EPA OAQPS
William Becker, STAPPA/ALAPCO

Attachment 1. Key Area and Off-Road Emission Source Categories

- Agricultural Production – Livestock – Cattle (NH₃)
- Agricultural Production – Livestock – Hogs (NH₃)
- Agricultural Production – Livestock – Poultry (NH₃)
- Agricultural Production – Livestock – Other (NH₃)
- Aircraft (PM₁₀, PM_{2.5}, NH₃, SO₂)
- Commercial Marine (PM₁₀, PM_{2.5}, NH₃, SO₂)
- Fugitive Dust – Construction (PM₁₀, PM_{2.5})
- Industrial – Mining and Quarrying (SIC 14. PM₁₀)
- Locomotives (PM₁₀, PM_{2.5}, NH₃, SO₂)
- Miscellaneous Area Source – Agricultural Production – Crops (PM₁₀, PM_{2.5}, NH₃)
- On-site Incineration – Waste Disposal, Treatment, Recovery (PM_{2.5})
- Open Burning – Land Clearing Debris (PM_{2.5})
- Open Burning – Waste Disposal, Treatment, Recovery (PM₁₀, PM_{2.5})
- Paved Roads (PM₁₀, PM_{2.5})
- Prescribed Fire – Forest and Grassland Burning (PM₁₀, PM_{2.5})
- Residential Wood Combustion (PM_{2.5})
- Stationary Source Fuel Combustion – Commercial/Institutional (SO₂)
- Stationary Source Fuel Combustion – Industrial (SO₂)
- Stationary Source Fuel Combustion – Residential (SO₂)
- Unpaved Roads (PM₁₀, PM_{2.5})
- Wastewater Treatment (NH₃)
- Wildfire – Forest and Grassland Burning (PM₁₀, PM_{2.5})