



Western Regional Air Partnership

February 10, 2006

Kathy Kaufman
EPA/OAQPS
Mail Code C504-02
Research Triangle Park, NC 27711

RE: WRAP comments on draft guidance for setting reasonable progress goals

Dear Ms. Kaufman:

On behalf of the Western Regional Air Partnership (WRAP) we are submitting the attached comments on the "Draft Guidance for Setting Reasonable Progress Goals Under the Regional Haze Program," dated November 28, 2005. As you know, approximately 75% of the nation's Class I areas are located within the WRAP region. Regional haze in these areas is caused by a variety of sources that must be addressed by western states and tribes without benefit of a federal regulatory framework such as CAIR. This makes it especially important that federal guidance on any aspect of regional haze address the issues that affect western Class I areas.

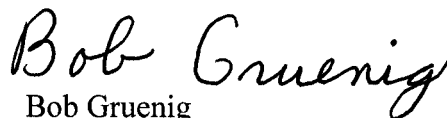
These comments were prepared by the Implementation Work Group of the WRAP's Air Managers' Committee-the state and tribal planners within the WRAP region who will be working with the guidance. We appreciate the opportunity to provide these comments and hope our suggestions, along with appropriate follow-up, will help make the guidance a more useful tool for states and tribes to meet the requirements of the Regional Haze Rule.

We would welcome the opportunity to discuss these comments with you and others at EPA, along with approaches EPA could employ to address them.

Sincerely,



Patrick Cummins
WRAP Co-Director



Bob Gruenig
WRAP Co-Director

February 10, 2006

WRAP Comments on "Draft Guidance for Setting Reasonable Progress Goals Under the Regional Haze Rule, November 28, 2005"

General:

In the draft Reasonable Progress Goal guidance, EPA notes that it is beyond the scope of the document to discuss the various technical documents and guidance relating to the demonstration of reasonable progress. However, this leaves the reader (the state or tribe) with a limited perspective on the rationale EPA has used in developing this policy document. It would be useful to see a narrative describing how the suite of modeling and other guidance documents were used in developing the draft.

Comments on specific parts of the draft guidance:

The Process of applying the Four Statutory Factors needs restructuring to account for technical analysis and ambient monitoring issues

Section 5.1 and later sections describe a step-by-step process for applying the reasonable progress factors. The process outlined will work only if a number of technical and intergovernmental barriers are addressed. These are briefly listed below.

The relationships between the regional and source-specific models are unclear.

For example, showing the benefits of controls like BART and the regional effects on haze are two separate modeling exercises. While the CALPUFF model is the approved model for showing benefits of BART controls from a single source, it is not intended to demonstrate the effects of a number of sources installing BART. The model for this is the regional model. The guidance should consider the transition from single source analysis of air quality benefits to the cumulative benefit demonstrated by the regional model.

The WRAP is in the process of preparing its own modeling guidance for western states and tribes that have elected to use CALPUFF to analyze benefits of individual BART controls. One goal of this guidance is to facilitate the transition from individual CALPUFF results to regional modeling of the collective benefits.

Discussion of the application of factors to Non-traditional sources should be expanded

The Clean Air Interstate Rule (CAIR) provides a strategy for meeting the Reasonable Progress Goals for eastern states where sulfates from stationary point sources appear to be the dominant factor in regional haze. In the West, point source controls, including BART, are one of several strategies that are likely to show up in the long-term plan for improving visibility. The others include non-traditional source categories such as fire,

dust and area sources. The draft guidance recognizes that some or all of the statutory factors are not applicable to these source categories, but provides very little guidance on what “reasonableness” factors should be applied to them. Further, since non-traditional sources affect Western Class I areas to varying degrees, our approach to applying the factors will rely on an array of tests and analyses, and not on a single-track, linear process. The guidance mentions the need for an iterative process, but only in terms of more strategies, not the analysis process itself.

Variability and magnitude of impacts from international and natural sources beyond the control of states and tribes should be recognized in establishing the Uniform Rate of Progress and setting Reasonable Progress Goals.

Under subsection 2.3 of the draft Reasonable Progress Goals guidance, the Uniform Rate of Progress is defined as the linear rate of improvement from baseline to natural conditions, which is consistent with the EPA’s *Guidance on Tracking Progress Under the Regional Haze Rule*¹. However, it would be reasonable to acknowledge that “natural conditions” is a theoretical statistical calculation that may not represent reality for some Class I areas, particularly those in the West that are impacted by international and natural emissions. These emissions, such as international transport of dust, maritime emissions, emissions from Canada and Mexico, wildfires and local windblown dust are generally beyond the control of any state or tribe. Therefore, it seems appropriate to provide more discussion on how such influences might be addressed in the calculation of Uniform Rate of Progress. If these impacts are disaggregated at the beginning of the process rather than at the end, as the document seems to imply, the planning agencies will be able to better understand the relative effects of alternate long-term control strategies.

In addition, the year-to-year variability of species impacts on Western monitoring sites is well established. The effects of dust, fire, and other natural factors create a range of monitored impacts from year to year. The natural variability of these impacts will influence whether or not the reasonable progress goal can be met at particular Class I areas in any planning period. Some discussion in the guidance is needed to address the demonstration of reasonable progress when these factors are prevalent.

Interstate consultation process – needs more detail

A brief mention of the consultation process is included under subsection 1.1 of the draft Reasonable Progress Goals guidance. However, more detail on the consultation process would be helpful, particularly for Class I areas where the majority of visibility impacts are from another state or country. The Regional Haze Rule establishes the basic consultation framework under the concept of Regional Planning Organizations such as the Western Regional Air Partnership (WRAP) but the rule doesn’t provide specific detail on how the consultation process would resolve disagreements among the States. Nor does the draft guidance address tribes, TIPs or states with no Class I areas. We suggest that the guidance more explicitly address requirements for tribes (where

¹ EPA-454/B-03-004, September 2003

they differ from state requirements) and include provisions that states without Class I areas, but which may have sources that affect Class I areas in other jurisdictions are involved in the consultation process.

The meaning of the term “Reasonable Progress Goal” needs to remain consistent with Regional Haze Rule Preamble

In the preamble of the Regional Haze Rule, the EPA clearly articulated, “the reasonable progress goal is a *goal* and not a mandatory standard which must be achieved by a particular date as is the case with the NAAQS².” However, under subsection 2.4 of the draft Reasonable Progress Goals guidance, the reasonable progress goal is described as a standard that must be met or exceeded through an iterative process. For the western states, it appears that uniform rates of progress may not be achieved for many Class I areas because wildfires, windblown dust and other sources beyond the control of a state or tribe at times will overwhelm any progress achieved in stationary and mobile source emission reductions. Thus “reasonable” progress for the western states may differ considerably from what is reasonable for the eastern states where sulfate dominates visibility degradation.

The guidance should clarify how the proposed PM_{coarse} NAAQS is factored in setting reasonable progress goals

PM_{coarse} is a significant contributor visibility impairment in many of the western Class I areas. Recent WRAP technical studies provide strong evidence that about 90% of PM₁₀ emissions are in the PM_{coarse} size range. EPA’s proposal to rescind the current PM₁₀ secondary NAAQS in rural areas would create large legal and policy uncertainties in existing regulatory authorities to address PM_{coarse} for haze where it is a significant issue, using the control measures needed to maintain the current PM₁₀ NAAQS. What assumptions should be made about a reasonable progress goals where authority for existing control measures for PM₁₀ may no longer be exist? Regardless, the guidance should provide a clear rationale and legal basis for addressing reasonable progress with respect to PM_{coarse} in the event that the proposed NAAQS revisions are adopted.

² 64 FR 35733, July 1, 1999 Regional Haze Regulations