



June 6, 2005

Attention: Docket ID No. OAR-2004-0013
U.S. Environmental Protection Agency
Mailcode 6102T
1200 Pennsylvania Ave., NW
Washington, DC 20460

The Western Regional Air Partnership (WRAP) is pleased to submit the following comments regarding EPA's proposal to revise the prevention of significant deterioration (PSD) regulations for nitrogen oxides (70 FR 8880 – February 23, 2005). The WRAP is a collaborative effort of Western states, Western tribes, and federal agencies working with business and environmental interests to address regional haze in Western Class I Areas. The following comments reflect a consensus of WRAP members and general agreement among WRAP stakeholders. However, we anticipate that some WRAP members and stakeholders will submit additional comments of their own.

In its proposal, EPA describes three alternatives for implementing PSD for nitrogen oxides (NO_x): (1) the current increment-based approach, (2) a cap and trade program in lieu of an increment system for NO_x, and (3) a state planning approach in lieu of an increment system.

The WRAP believes that the option of retaining the increment program is important and should be maintained. We also believe that the alternative approaches proposed by EPA have potential benefits and should be further explored as additional options for addressing PSD for NO_x. However, before finalizing either of these alternatives, EPA must provide more information on how they would work, including how they would protect ecological resources and prevent localized impacts. Therefore, we urge EPA to define the programmatic and implementation details of these options by issuing a supplemental notice of proposed rulemaking.

The WRAP sees either of the proposed alternatives as an opportunity to at least partially integrate PSD requirements with regional haze planning, fostering a more unified NO_x control program capable of achieving superior environmental results, greater regulatory certainty for sources, and improved administrative efficiency. Therefore, we encourage EPA in its rulemaking to consider how regional planning and regional control strategies can simultaneously satisfy or address regional haze and PSD requirements.

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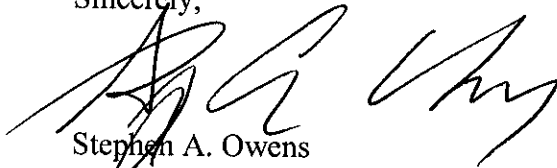
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It is our understanding (and recommendation) that only the increment portion of the PSD program would be affected by EPA's proposal and that the best available control technology (BACT) provisions for new sources would not be affected. Also, protection of air quality related values (AQRVs) remains an important objective of the program. EPA should elaborate on how AQRVs would continue to be protected under the options proposed.

The WRAP supports the concept of offering states and tribes options to implement PSD for NOx, provided that the options offer improvements as compared to the traditional increment-based approach.

The WRAP appreciates this opportunity to provide comments and urges EPA to work with states, tribes, and other interested parties in developing the detailed rules and guidance to implement the concepts embodied in the recently proposed rule.

Sincerely,



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of Environmental Quality



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