

Draft SIP Language for Regional Haze Plans – Long-Term Strategy Commitments for Monitoring, Emissions Inventories, and Ongoing Regional Analysis



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Background

Late 07/Early 08 Regional Haze SIPs are foundational – begin reasonable progress tracking toward 2018 milestone

- States must adopt Long-Term Strategies (LTS)
- Exact SIP language is up to each state
- Haze planners have reviewed language in document and are ready to use in their SIPs
- LTS related to monitoring, emissions inventories, and ongoing regional analysis are grouped for review
 - 6 LTS “technical analysis” elements are relevant

6 Key LTS “Technical Analysis” Elements for review

- 1) §308(d)(4) – *Monitoring strategy and other implementation plan requirements*
- 2) §308(d)(4)(i) – *The establishment of any additional monitoring sites or equipment needed to assess whether reasonable progress goals to address regional haze for all mandatory Class I Federal areas within the State are being achieved.*
- 3) §308(d)(4)(ii) - *Procedures by which monitoring data and other information are used in determining the contribution of emissions from within the State to regional haze visibility impairment at mandatory Class I Federal areas both within and outside the State.*
- 4) §308(d)(4)(iv) - *The implementation plan must provide for the reporting of all visibility monitoring data to the Administrator at least annually for each mandatory Class I Federal area in the State. To the extent possible, the State should report visibility monitoring data electronically.*
- 5) §308(d)(4)(v) – ... *Emissions inventory tracking and periodic updates ...*
- 6) §308(d)(4)(vi) - *Other elements, including reporting, recordkeeping, and other measures, necessary to assess and report on visibility.*

#1 - §308(d)(4) – *Monitoring strategy and other implementation plan requirements*

- States adopt IMPROVE program and operations as a SIP commitment
- State SIP goals for IMPROVE related to approval/ongoing implementation of regional haze SIPs
 - Maintain a stable configuration of the individual monitors and sampling sites, and stability in network operations;
 - Assure sufficient data capture at each site of all visibility-impairing species;
 - Comply with EPA quality control and assurance requirements; and
 - Prepare and disseminate periodic reports on IMPROVE program operations.
- Requires ongoing EPA funding for this activity
- What happens as IMPROVE changes over time !?!?

#2 - §308(d)(4)(i) – *The establishment of any additional monitoring sites or equipment needed to assess whether reasonable progress goals to address regional haze for all mandatory Class I Federal areas within the State are being achieved.*

- States adopt IMPROVE-designated reasonable progress tracking sites (110 nationwide) – minimum
- States may also adopt additional State/FLM protocol sites
- States may also adopt PM2.5 speciation and FRM mass monitors
- To be available on VIEWS/TSS – data not currently available would be added to conform with haze SIP commitments

#3 - §308(d)(4)(ii) - *Procedures by which monitoring data and other information are used in determining the contribution of emissions from within the State to regional haze visibility impairment at mandatory Class I Federal areas both within and outside the State.*

- States adopt VIEWS/TSS as regional resource for technical data as basis of analyses of implementation and reasonable progress
- States commit to participate in future regional analysis efforts by WRAP
- States may also do their own studies

#4 - §308(d)(4)(iv) - *The implementation plan must provide for the reporting of all visibility monitoring data to the Administrator at least annually for each mandatory Class I Federal area in the State. To the extent possible, the State should report visibility monitoring data electronically.*

- State adopts IMPROVE program providing timely, complete, accurate reporting to VIEWS and elsewhere
- Requires ongoing dedicated EPA funding for this activity

#6 - §308(d)(4)(vi) - *Other elements, including reporting, recordkeeping, and other measures, necessary to assess and report on visibility.*

- State adopts commitment to:
 - Meet emissions reductions obligations for sources under that state's control
 - Prepare inventories and track emissions for sources regulated by that state
- State adopts IMPROVE as provider for regional haze monitoring data and related records
- State points to WRAP to coordinate studies of implementation and reasonable progress