

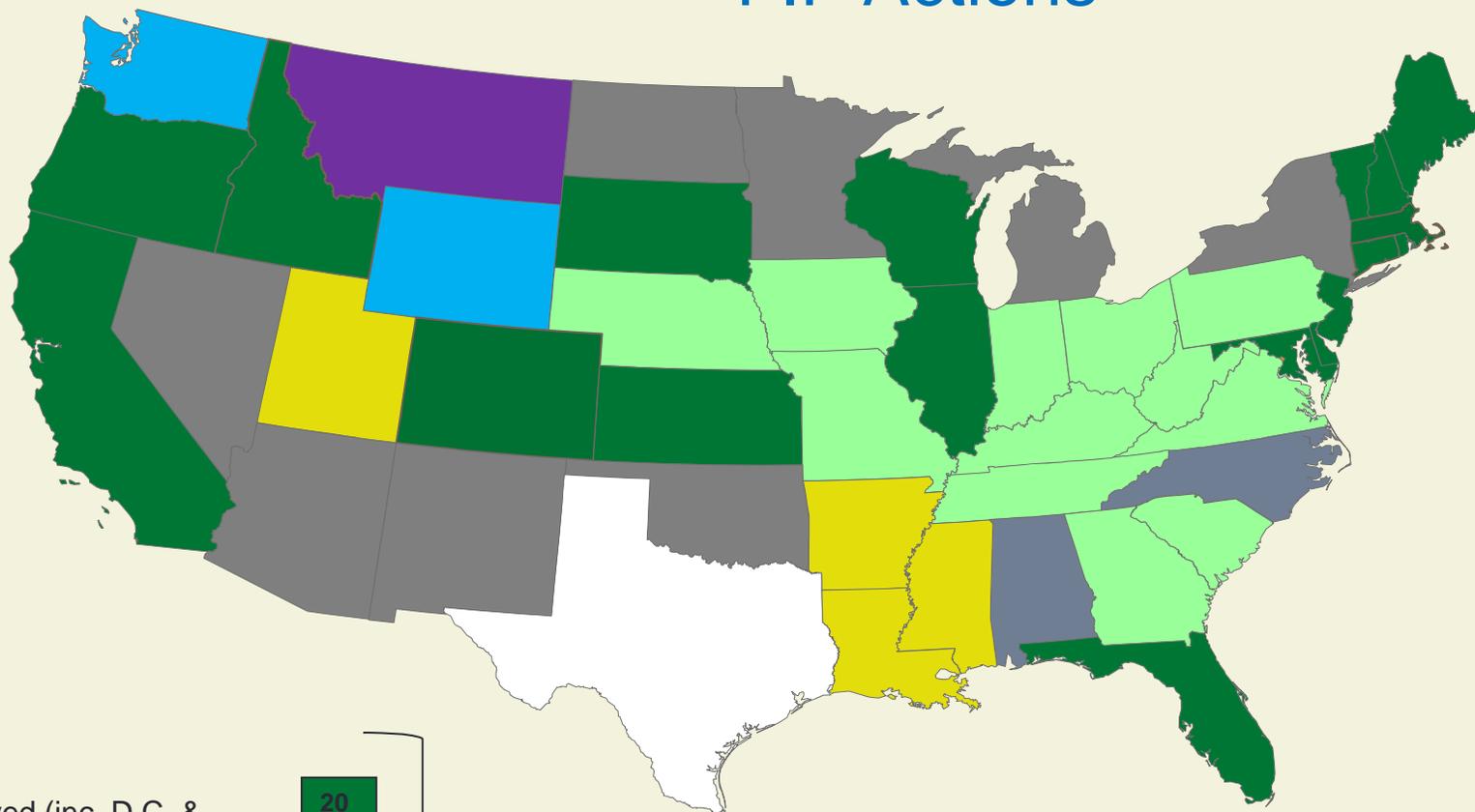
***WESTAR Concerns and Recommended
Improvements to the Regional Haze Rule***

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IMPROVE Steering Committee Meeting

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Current Status of Regional Haze SIP and FIP Actions



Approved (inc. D.C. & AK)

20

Approved + CSAPR FIP

12

Approved but needs CSAPR SIP within 2 years

2

SIP Approval Actions

Partial disapproval w/ 2-year FIP clock

4

Limited disapproval for CAIR. No other action.

1

Full FIP (MT & HI & VI)

3

Final Partial FIP* (inc. FCPP)

9

Proposed Partial FIP*

2

FIP Actions (*status of rest of SIP varies)

Recommendations from WESTAR Regional Haze Workgroup

WESTAR recommended improvements in the following areas;

- **5 - Year Progress Reports**
 - **Achieving Natural Conditions & Reasonable Progress**
 - **Developing Effective Long-Term Strategies after BART to Achieve Reasonable Progress**
 - **Integrate Planning**
 - **Class I Area Visitation as a Consideration**
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- ***Regional Haze Rule Requirements***
 - ***Issues and Concerns***
 - ***Recommendations***

Recommendations from Regional Haze Workgroup

Core Issue 1: 5 - Year Progress Reports

The RHR requires

- Comprehensive SIP revision every 10 years (first in 2018)
- Progress report every 5 years in the form of SIP revision
- Determination of adequacy of the existing SIP every 5 years
- If existing SIP inadequate (to ensure reasonable progress) - a SIP revision within one year

Issues and Concerns

- A progress report should not require SIP revision
- Excessive workload burden
- 5 years too short to show valid trends in West + too short for determination of adequacy

Recommendations

1. Eliminate SIP revision requirement
2. Eliminate determination of adequacy
3. Synchronize RH progress reports with other EPA programs

Recommendations From Regional Haze Workgroup

Core Issue 2: Natural Conditions & Reasonable Progress

The RHR Requires

- Achieve *Natural Conditions* by 2064 , and show *Reasonable Progress* improving 20% worst days.

Issues and Concerns

- Eliminating all anthropogenic impairment by 2064 not possible.
- Some anthropogenic sources are beyond State control: offshore shipping, international and global emissions.
- Natural sources interfere with State's ability to show RP.

Recommendations

1. Greater focus on “controllable” sources
2. Allow an “affirmative demonstration” for RP
3. Treat some forestry burning as “natural” (like wildfire)
4. Recalculate or redefine Natural Conditions
5. Clarify how to set Reasonable Progress Goals after 2018
6. Consider emissions-based approach similar to Section 309

Recommendations From Regional Haze Workgroup

Core Issue 3: L-T Strategy to Achieve Reasonable Progress

The RHR Requires

- States to identify **all** anthropogenic sources of visibility impairment (major, minor, mobile and area sources).
- States to consider the costs, time necessary for compliance, energy and non-air quality impacts, and remaining useful life.
- States to include enforceable emissions limits, compliance schedules etc., including measures to obtain share of reductions to meet reasonable progress in other states.

Issues and Concerns

- No clear process to identify sources needing emission controls.
- No requirement to show how sources affect Class I visibility.
- No threshold or legal basis on what's "reasonable progress."

Recommendations

1. Provide clear criteria for identifying sources to be controlled.
2. Add a 5th Factor to show contribution to haze.
3. Clarify how to measure reasonable progress; include legal basis.

Recommendations from Regional Haze Workgroup

Core Issue 4: Integrate Planning

The RHR requires

- A SIP revision by July 31, 2018 and every 10 years thereafter
- Reasonable progress goals for the 10 year planning period

Issues and Concerns

- State programs are focused on health-based NAAQS
- Major NAAQS SIP deadlines are out of sync with RH SIP
 - Flexibility under section 169A of Act
- Most significant causes of haze in the west can't be resolved in a 10-year planning period

Guiding Principles

1. Allow States to focus on NAAQS-related controls
2. Integrate RHR and NAAQS planning efforts and timing
3. Identify strategies to improve haze not addressed through NAAQS.
4. Extend 10 year planning period if needed

Recommendations from Regional Haze Workgroup

Core Issue 5: Visitation as an option

The RHR requires

- Improving haze on 20% worst days - regardless of time of year, and the number of people affected.

Issues and Concerns

- Nothing in Section 308 of RHR addresses visitation.
- In many western Class I areas - summer visitation far exceeds other seasons - due to elevation and weather.

Recommendations

1. RHR should encourage States to develop haze strategies for high visitation periods (where applicable).
2. States should get more credit for improving 20% worst days during high visitation periods.
3. Similarly, RHR should consider improving haze for Class I areas with higher **annual** visitation.