



ADDITIONAL METHODS, DETERMINATIONS, AND ANALYSIS TO MODIFY AIR QUALITY DATA BEYOND EXCEPTIONAL EVENTS

WESTAR Comment Letter

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Main Areas Covered

- EPA identified multiple situations where data exclusion may apply and clarified if the Exceptional Events rule would be applicable.
 - *Modeling Analysis (PSD, O₃ and PM_{2.5} SIP Attainment, Interstate Transport, Conformity)*
 - *Regional Haze Most Impaired Days Selection*
 - *Limited Maintenance Plan Qualification*
 - *Monitoring Requirements*

Modeling Analysis

- EPA agrees that some data should be excluded from modeling analyses if the data is not representative (i.e., for background concentrations)
- These exclusions would not change the design value in AQS
- States should include justification for removal in a modeling protocol and have early discussion with EPA, they should not submit an EE demonstration.
- EPA will determine if the data exclusion has been properly documented and justified when acting on the permit action or SIP submittal.

No major concerns from WESTAR states

Regional Haze

- Data impacted by natural events could impact the selection of the 20% most impaired or clearest days
- States should follow the guidelines in the Regional Haze Rule and not submit an EE demonstration.
- EPA will evaluate if a state has appropriately justified the selection of 20% most impaired or clearest days when it acts on the Regional Haze SIP.

Asked for additional clarification as to how Regional Haze data is treated vs. traditional NAAQS compliance monitoring data

Limited Maintenance Plans

- Design value calculations for the purpose of LMP qualification can exclude data influenced by exceptional events.
- States should submit an EE demonstration
- These exclusions would not change the design value in AQS

Supports using EE demonstrations for LMP qualification, but clarified that it should be for initial qualification and not annual status updates.

Monitoring

- Data can not be excluded for the purpose of determining monitoring requirements
- Days impacted by an Exceptional Event still count towards data completeness
- Data can not be excluded for determining priority classification of areas and adequacy of actions of emergency episode planning.

Disagreed with EPA regarding monitoring requirements, believed EE should be taken into account.

Additional WESTAR Comments

- Desire for guidance on a stream-lined submission process for straight-forward events
- Encouraged EPA to update electronic data systems to help improve efficiency in the EE process.
- Requested continued flexibility in the interpretation of ‘case-by-case’ situations.
- **Desire for guidance to cover more situations where data exclusion may be applicable**
 - *Consistency in design value calculations*
 - *How data from AQS should be used for health studies, modeling, public reports, and petitions*
 - *How to communicate air quality data to the public*
 - *International source contributions*
 - *State/EPA Performance Partnership Agreement reporting requirements*

Timeline

- Draft Guidance released on October 9, 2018
- WESTAR Council approved comment letter on December 12, 2018
- EPA Releases final guidance on April 4, 2019