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October 30, 2000

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Dr. Ned Meyer  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711

Dear Dr. Meyer,

Thank you for offering WESTAR an opportunity to review and comment on the first draft of *Guidance for Demonstrating Attainment of Air Quality Goals for PM<sub>2.5</sub> and Regional Haze*. Members of the WESTAR Modeling Committee have reviewed the document and participated in a series of phone conferences, and the opinions of the WESTAR states are represented in this letter.

First, we commend you on writing such a well-organized and detailed draft guidance document. We found the draft to be easy to understand and thorough. We appreciate the flexibility that EPA has proposed for modeling analyses, such as choice of models and episodes to model. This flexibility is greatly appreciated and will likely result in better analyses. We also like the weight-of-evidence analysis and feel that it will enable states to make better decisions about control strategies by providing flexibility.

We encourage EPA to finalize this guidance quickly, as many of the WESTAR states participating in the Western Regional Air Partnership (WRAP) are evaluating their choice between meeting the section 308 or 309 requirements of the regional haze rule. This choice needs to be made by the end of 2003, and the analysis supporting the choice should be performed consistent with EPA guidance. We are currently beginning analyses related to this SIP submittal deadline, whereas other regions of the country are not required to submit their SIPs until 2008. We would like the guidance to be final as quickly as possible, so that our analyses can conform to the guidance.

We agree that the use of the models in a relative sense will minimize errors and provide a better base for the estimate of reduction necessary to meet PM<sub>2.5</sub> standards and regional haze goals. However, we do have some reservations about the use of relative reduction factors (RRF), in that some feel this is an inappropriate "calibration" of the model. Use of the RRF may also be problematic if the chosen model performs poorly or monitoring data is not available and complete.

Because of the critical need for monitoring data with the RRF approach, we believe that there must be better coordination between monitoring and modeling staff, and that this coordination must start at the national level and "trickle down" to the state level. This coordination will be especially important in the siting of monitors to collect speciated data.

The accuracy of the emissions inventory is very important to obtain good results from modeling analyses. We urge EPA to continue the development of emissions modeling tools and emission factors, especially for  $PM_{2.5}$ .

The guidance document should address the issue of how states significantly impacted by international sources are to determine reasonable progress and natural background. States have limited (if any) leverage with respect to controlling international source emissions; thus it will never be possible to achieve true natural background in some areas (barring some unlikely treaty), particularly for some Class I areas in the west. Further, it may be prohibitively difficult for domestic emission reductions to achieve reasonable progress goals if foreign emissions dominate the 20 percent worst visibility days. Based on limited CALPUFF modeling, this is the case in Medicine Lake (MT) and Lostwood (ND) Wilderness Areas.

The simplest solution would be to simply omit international sources from the emissions inventory for reasonable progress modeling, and somehow incorporate the contribution of international sources in a "pseudo" natural background. Of course, this would affect the chemistry in the model. Another solution would be to change the definition of reasonable progress to account for the contributions of international sources. Given the likelihood that reasonable progress demonstrations will be based on regional-scale modeling, it could be argued that accommodations necessary for some states will affect other states; thus it seems logical to address this issue in the guidance document.

There will be a continuing need for training in the use of the various models (MODELS-3, CAMx, REMSAD, etc.) and for assistance in choice of models by individual states. We appreciate the recent training and workshops that EPA has offered on MODELS-3, and hope that EPA will continue with training and workshops related to the models. Although much of the regional haze modeling will likely be performed by regional centers, there may be a need for individual states to analyze state-specific cases. These models are quite resource-intensive and some state modeling programs are not yet up to the task.

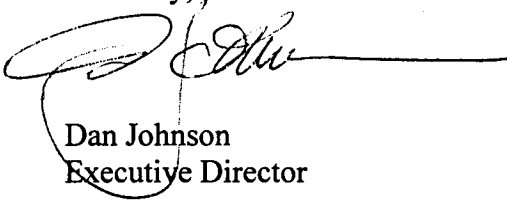
Although the guidance is sufficiently thorough on most issues, we would like more guidance and advice on the stakeholder involvement process discussed in Section 11. It is difficult to inform stakeholders about very complex technical methods. The role of EPA regional offices should be clearly defined. For example, the WRAP states answer to four different regional offices. There is a need for coordination and consistency between the regional offices.

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Clarification on the regional office role (and the necessity of timeliness of review by regional offices) would certainly aid the process.

Thank you for your consideration of our comments. We look forward to seeing the revised draft.

Sincerely,



Dan Johnson  
Executive Director

Cc: WESTAR Council  
Modeling Committee