

September 12, 2022

Peter Tsirigotis, Director
OAQPS
109 T.W. Alexander Drive
RTP, NC 27711

Dear Director Tsirigotis,

We come to you today to emphasize the need for the development of the next emissions modeling platform (EMP). As you know, the 2016 EMP Collaborative¹ was formed to involve multi-jurisdictional organizations (MJOs), state, local, and tribal (SLT) air agencies in the development of national emissions modeling inventories and EMPs. The benefits of early engagement with SLTs in the process improved the quality of the data, provided SLT staff an opportunity to learn how EPA develops emissions data for various sectors, and provided the opportunity for EPA and SLTs to closely collaborate throughout the process. This close collaboration was beneficial because it provided SLT staff with multiple and continuous opportunities to provide input to the EMP. While we understand that the 2016 EMP Collaborative process was slower and more deliberate than in the past, the time spent was worthwhile as the quality of the final product was improved through inclusion of MJO and SLT agency perspectives and input.

As everyone is well aware, the SIPs for the 3rd regional haze planning period are due July 2028, necessitating a start to the planning process in 2024 or 2025 at the latest. This will allow the SLTs adequate time to meet the interstate and interagency consultation requirements of the Regional Haze Rule (RHR). Due to the COVID-19 pandemic, we have seen anomalies in emissions inventory data. For this reason, an EMP based on the triennial 2020 National Emissions Inventory (NEI) is not a feasible candidate for air pollution planning. An EMP based on the triennial 2023 NEI that becomes available in 2025 would come too late in the 3rd haze planning period to ensure that states could submit their SIPs on time.

Since a collaborative EMP development process requires more time to create than one built solely as an EPA in-house effort, we encourage EPA to commit to begin working with the MJOs and SLTs on a new EMP collaborative as soon as practicable. The relationships developed during the 2016 EMP Collaborative are strong, and we should take advantage of the trust and familiarity among the EPA, MJO, and SLT staff to define and implement the next EMP process. The MJOs and SLT air agencies cannot produce a national EMP on their own; the extensive expertise and knowledge at EPA needs to be leveraged to achieve the goal of a new collaborative EMP. We ask that EPA commit resources to initiating the next collaborative process now so that we can all work together efficiently and effectively to improve air quality nationally.

¹ <http://views.cira.colostate.edu/wiki/wiki/9169>

We look forward to continuing this discussion with you and members of your staff to ensure that the next EMP reflects the best efforts of the collaborative team and provides the best data available for air quality planning.

Sincerely,

Mary A. Uhl, Executive Director, WESTAR



Zac Adelman, Executive Director, LADCO



Michael Vince, Executive Director, CENSARA



Marc Allen Robert Cone P.E., Executive Director, MARAMA



Paul Miller, Executive Director, NESCAUM



