



Draft Guidance on Progress Tracking Metrics,
Long-term Strategies, Reasonable Progress Goals and Other
Requirements for Regional Haze
State Implementation Plans for the
Second Implementation Period

Discussion with NACAA's Criteria Pollutants Committee

July 28, 2016

You can get more information at <http://www.epa.gov/visibility>.

Organization of the Draft Guidance Document

- Sections 1-3: History of the CAA, regulatory and guidance provisions on regional haze, steps in SIP development and roadmap for the document.
- Section 4: Overarching Issues.
- Sections 5-11: A separate section for each of seven steps a state will take to develop its SIP revision. Next slide provides an overview.
- Appendices (one-half of the document)
 - A – Finer detail on the seven steps in SIP development.
 - B & C – EPA actions on SIPs and Circuit Court decisions in the 1st implementation period.
 - D, E, & F – Relevance of specific aspects of three previous EPA guidance documents and the BART Guidelines.
 - G – Relevant excerpts from 40 CFR 51.308 (in this draft version of the guidance document, these excerpts are as proposed in the NPRM).

Section 4 – Overarching Issues

Overview

- 4.1. Screening sources prior to the four-factor analysis and deferring some sources to later implementation period
- 4.2. Considering visibility impacts and benefits when screening sources and conducting the four-factor analysis
- 4.3. Focusing on the 20 percent most impaired days
- 4.4. Determining the measures “necessary to make reasonable progress”
- 4.5. The Relationship between the LTS and the RPGs
- 4.6. Comparing the RPGs to the URP
- 4.7. Documentation
- 4.8. Consultation

Section 4 – Overarching Issues, cont.

Recommendation on Consideration of Visibility

- A state may, but is not required to, consider visibility impacts and benefits when screening sources and conducting the four-factor analysis of emission reduction measures.
- EPA recommendation:
 - States should consider visibility impacts when screening sources and source categories.
 - States should not consider visibility benefits after the screening step.
- First alternative approach – Like the recommended approach, but without a screening step.
- Second alternative approach – After screening, a state would consider visibility benefits along with the four statutory factors

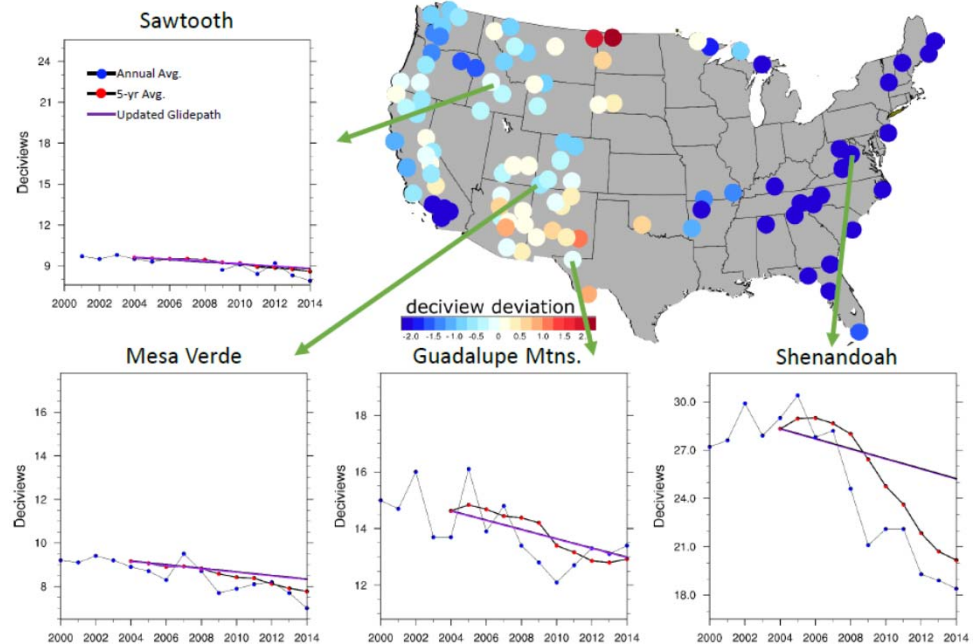
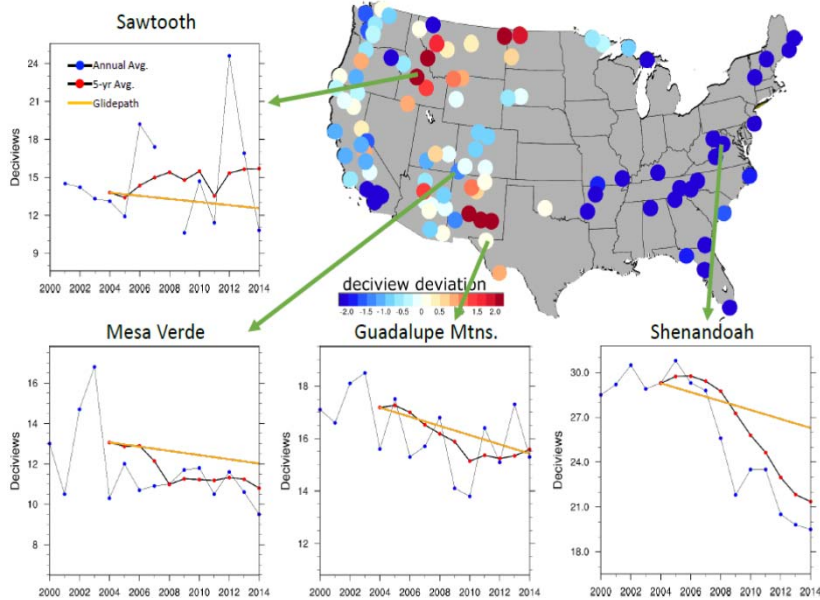
Section 5. Ambient Data Analysis

Overview

- The draft document assumes a state is using the 20 percent most anthropogenically impaired days as the “worst days.”
 - The key issue is then how to separate PM light extinction on a given day between natural and anthropogenic causes.
- The draft document presents draft recommendations for analyzing IMPROVE data in a new way to make this separation.
- It is a purely mechanical process to apply the approach to a particular Class I area.
- The draft document (with the TSD) shows the outcomes for the recommended approach for every Class I area, through 2014.

Section 5. Ambient Data Analysis, cont.

Results – 2014 Glidepath Comparisons



Section 6 - Screening of sources

- A state may screen sources and defer some sources to later implementation periods.
- Because screening is based on visibility impacts at Class I areas, the state must first establish which Class I areas are affected by sources in the state.
- When screening sources, a state should focus on impacts on the 20 percent most impaired days.
- EPA recommends that screening go “deep enough” to bring forward a large majority (e.g., 80 percent) of the impacts from in-state stationary sources.
- EPA is recommending that a state take a 2028 perspective when it screens sources.

Section 7 - Source and emission control measure characterization

- What measures should be considered for a given source?
- Establishing the facts about the four factors for those measures.
- Recommendations regarding using factual information from earlier work.
- Applicability of prior EPA guidance about how to establish the facts (appendices D, E, & F).
- States should consider information presented in FLM or public comments.

Section 8.1 – Recommendations for states following EPA’s recommendation to not consider visibility benefits

- After the screening step, a state should not reject a measure if the cost of compliance is within the range of reasonableness.
- EPA recommends that a state adopt the most effective control measure within the range of reasonableness, based on consideration of only the four statutory factors.
 - The state should not use the information regarding a source’s visibility impacts developed at the screening stage in evaluating the four factors.
 - Cost of compliance will often be the most critical factor.
- Cost/ton comparisons to past regulatory decisions for the same type of source, by EPA or a state, are a guide to whether the cost of compliance is within the range of reasonableness.
- Also addressed:
 - Recommendations on source aggregation issues when deciding on what measures are needed for reasonable progress.
 - Consideration of the viability of continued source operation.

Section 8.2 – Recommendations for states choosing to consider visibility benefits

- “[S]tates may determine *in the second implementation period* that the costs of compliance associated with a given control measure outweigh the visibility benefits of that measure and not include the measure in the LTS without contradicting the national goal.”
 - Do not reject a measure merely because its visibility benefit is not perceptible.
 - When considering visibility benefits along with the four statutory factors, consider the whole distribution of daily visibility benefits.
 - EPA does not recommend use of a cost/deciview metric.
 - Benefits at multiple Class I areas should be considered, but do not compare cumulative benefits to a perception threshold.
 - For the step that involves weighing the four factors and visibility benefits, these states should consider only past decisions in the visibility protection program that involved weighing the four factors and visibility benefits.
- States choosing this approach are not required to adopt a measure that is unreasonable assuming visibility benefits are not considered. See Section 8.1.
- “[This approach] presents considerable technical challenges.”
- Also addressed:
 - Recommendations on source aggregation issues when deciding on what measures are needed for reasonable progress.
 - Consideration of the viability of continued source operation.

Section 10 - Progress, degradation, and glidepath checks

- The Regional Haze Rule requires states to make some progress on the 20 percent most impaired days; there may be no predicted degradation on the 20 percent clearest days.
 - The NPRM proposed that 2000-2004 be the benchmark for both requirements.
- Being “on or below the glidepath” is not a requirement and also is not a safe harbor.
- When the RPG for the 20 percent most impaired days for a Class I area is above the glidepath:
 - NPRM: Each state with sources contributing to the Class I area must show that there are no other measures needed for reasonable progress.
 - Section 10.3 (pages 119-121) of the draft guidance document contains recommendations about how a state may make this showing.