**NACAA Members’ Questions for EPA on**

**Draft Regional Haze Guidance**

**For July 28, 2016 NACAA-EPA Conference Call, 1-2 PM Eastern Time**

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**Wisconsin**

1. Can EPA please explain why the 2007 Guidance will no longer be applicable, as you did for the applicable portions of the 2003 Guidance, 2006 Q&A document, and BART Guidelines?
2. The guidance is setting a default approach for screening sources based on thresholds.  There are two particular questions:
3. What is the substantiation for using an 80% threshold?  The 80% could potentially be far in excess of that required to meet the next URP requirement or after.
4. In order for a state to establish a visibility impact threshold for screening purposes (e.g. a specific dv level), what is the metric EPA used to establish an 80% inclusion level of particulate matter (or PM species) emissions that collectively account for contributing to the anthropogenic extinction budget from a combination of major/minor/area source and/or categories to be considered for screening? The guidance acknowledges that in order “To show that this coverage has been achieved, *a state could first determine the aggregate light extinction impact of all in-state stationary sources averaged over the 20 percent most impaired days,* *for example through source apportionment modeling* (emphasis added), and then compare the sum of the impacts from the sources being brought forward from the screening process to this aggregate impact.”  Is EPA saying that the visibility impact threshold for screening be established by running a source apportionment modeling exercise on all PM/PM species from all major and minor sources in the state and then establish the screening threshold so that 80% of those sources are captured (e.g. a threshold of 0.07 dv would be needed in order to capture 80% of all sources)? How would inclusion of area sources (as stated in the guidance verbiage above and which do not fall under typical regulatory regimes and in some cases are regulated through federal requirements) be considered?
5. EPA provides an alternative screening approach where the state can use visibility as a criteria when evaluating potential control measures.  EPA’s discussion indicates this would be a high hurdle.  Can EPA describe how this would be different from following a BART-type of analysis where sources were identified by visibility impact and then a similar four-factor analysis that allowed for considering $/dv cost average and marginal cost were then applied?
6. EPA claims that a state may deviate from its recommendations in the proposed guidance for determining the measures necessary to make reasonable progress, but must justify any approach that contradicts a specific recommendation. Can EPA provide any more clarity (such as examples) on how far a state can deviate from its recommendations and still have an approvable SIP, and what kind of justification is required for this deviation?

**Missouri**

1. Although this question isn’t directly related to the draft guidance it is related to RH:

We have heard that EPA will be releasing modeling by the end of this year for RH.  Could EPA share any more information on what kind of modeling this will be?  Does EPA expect that states will use/build upon this technical work to end up with an approvable LTS/RPGs?   Does EPA plan to address how states should establish their goals if no further controls are found to be ‘reasonable’ and they are below the glidepath in EPA’s modeling (i.e. is EPA’s modeling going to be sufficient to set goals if no further controls warrant a separate modeling exercise)?