



## Key point analysis of [August 20, 2019 EPA Regional Haze Planning Guidance](#)

with respect to Regional Haze planning activities in the WESTAR-WRAP region and the analysis activities in the [WRAP 2018-2019 Workplan update](#) of April 3, 2019

August 28, 2019

### Key points

1. The guidance purports to "reduce state planning burdens". Coming this late in the process, it only creates an additional burden on states to determine if what they have done is within the scope of the guidance. The comprehensive regional Workplan does not conflict with, addresses a number of regional haze analysis topics more robustly than the guidance "suggests is needed", and the Workplan and guidance conform.
2. The 2017 announcement of reconsideration further threw a wrench in the works by creating continuing uncertainty, much like the late-breaking guidance and yet to be revealed national regional haze modeling (with undocumented emissions inventory changes).
3. On selection of sources, the review of 80% of in-state sources guidance is gone, as is the 1% contribution threshold. The WESTAR-WRAP workplan processes for 4-factor analysis and our Q/D analysis fit right in with what EPA suggests. EPA suggests that states may leave some sources for analysis in future planning periods. The western modeling and source apportionment plans fits right in the EPA guidance as well.
4. The guidance persists in clinging to the belief that there should be no safe harbor even if the glidepath is met. It says that states are not exempted from including enforceable emissions limits and schedules if 20% most impaired is below the glidepath. This somewhat contradicts EPA's suggestion that state could leave some sources for analysis in future planning periods.
5. Kindly, the guidance acknowledges that RPGs are still not an enforceable requirement.

### Detailed citations related to key points

Pg. 33 (of 87 pages in document) – linkage of NEPA to aspects of 4-factor analysis, relevant to projections O&G and other energy development through federal lease projects

Pg. 35 – evaluation of individual source contributions and visibility benefit from prospective additional controls continues to rely upon modeling but suggests no model. WRAP guidance ([WRAP Reasonable Progress Source Identification and Analysis Protocol](#)) provides further considerations and more applied approaches.

Pg. 45 – focus on enforceable controls to operate 24/7/365, short-term episodic controls not for use in context of regional haze program.

Pg. 47 – numerous recommendations about applying results from regional photochemical grid models to set Reasonable Progress Goals, these should be carefully analyzed for presentation of modeling, monitoring, and visibility projections results on [Technical Support System v2](#) display tools.

Pg. 48 – visibility improvement analysis of visibility projections to reference the individual monitored days from the 2000-04 baseline period and suggest those exact days are the dates in 2028 at each Class I areas. Further analysis of model performance is needed to determine if “locking in” those dates is meaningful.

Pg. 55 – emissions inventories used in regional and state analyses are not subject to EPA review.

Pg. 69 – specific suggestions for adding prescribed fire and international contributions to the glide path. Evaluation of this language for use in TSSv2 tool displays is needed. Also, the need for states to include SIP revisions addressing monitoring strategy of using IMPROVE is noted.

Pgs. 70 through 76 – Appendix B nicely summarizes 2017 RHR changes overall.

Pg. 74 – confusing language from §308(f)(1)(i) about characterizing data for baseline monitoring period, does not recognize Round 1 work. Outreach to EPA about western Class I areas’ data is needed.

Pg. 74 – note additional factors for the state Long-Term Strategy that “must” be considered in preparation of each SIP, from Clean Air Act.

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