 

**Immediate Actions and Next Steps needed to stabilize IMPROVE monitoring data record and Regional Haze tracking statistics for western Regional Haze planning**

**Draft 1.0 – December 12, 2019**

Three key outstanding issues are impeding analyses and planning work by the WESTAR-WRAP region states. The responsible organizations to address those issues are the IMPROVE Steering Committee and EPA OAQPS. Addressing issues #1 through #3 below in a near-term timely manner will allow a stable database for use in the active Regional Haze planning efforts by western states for the 118 of the national total of the 156 Class I federal areas. Development of comprehensive State Implementation Plans with controls and 2028 Reasonable Progress Goals is required by July 31, 2021.

Please contact Tom Moore, WRAP Air Quality Program Manager (970) 491-8837 or [tmoore@westar.org](mailto:tmoore@westar.org) with plans by IMPROVE and EPA to address the needed actions listed below.

Immediate Needed Actions

1. The IMPROVE Committee needs to complete re-submittal of 2017 and 2018 data as noted by Scott Copeland, IMPROVE Steering Committee Chair, as soon as possible, preferably by Jan. 1, 2020.  These particular data are to be reported to CIRA air quality database and to AQS.
2. Corrections to 5-year average trend data 2000 through 2018 must then be made by OAQPS in a revision or correction to the [Technical Guidance on Tracking Visibility Progress](https://www.epa.gov/visibility/technical-guidance-tracking-visibility-progress-second-implementation-period-regional) memo (published December 20, 2018) to address and include data substitutions previously authorized by states for SIPs under the RHR; those are already completed and available through the FED and TSS websites using the CIRA air quality database, which also hosts the IMPROVE data.  The updated memo needs to reference use of data from CIRA air quality database that feeds FED and TSS, not from AQS.
3. The statistics in this corrected or revised EPA memo should not be changed even if IMPROVE later changes any of the 2000 through 2018 data record at some point in the planning cycle culminating in the July 2021 Regional Haze Round 2 SIP submittals and also would include the up-to-18-month subsequent period that EPA is allowed under the Clean Air Act to determine completeness and approve the SIPs, i.e., no changes to the data used in western U.S. Regional Haze plans through at least January 2023.  The 2000-18 monitoring data used in the SIPs must be stable and not changing from January 2020 until the SIPs are determined to be complete and approved.

Next Steps

The CIRA air quality database supporting Round 2 Regional Haze planning through TSS will immediately be frozen for those 2000 through 2018 data after the prior steps are completed.  It is urgent to complete the previous 3 steps so that the actual Regional Haze planning by each state can occur in the 2020 into 2021 timeframe as required in the RHR.