

# REGIONAL HAZE TIMELINES & PLANNING



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**MANE-VU Board Meeting**

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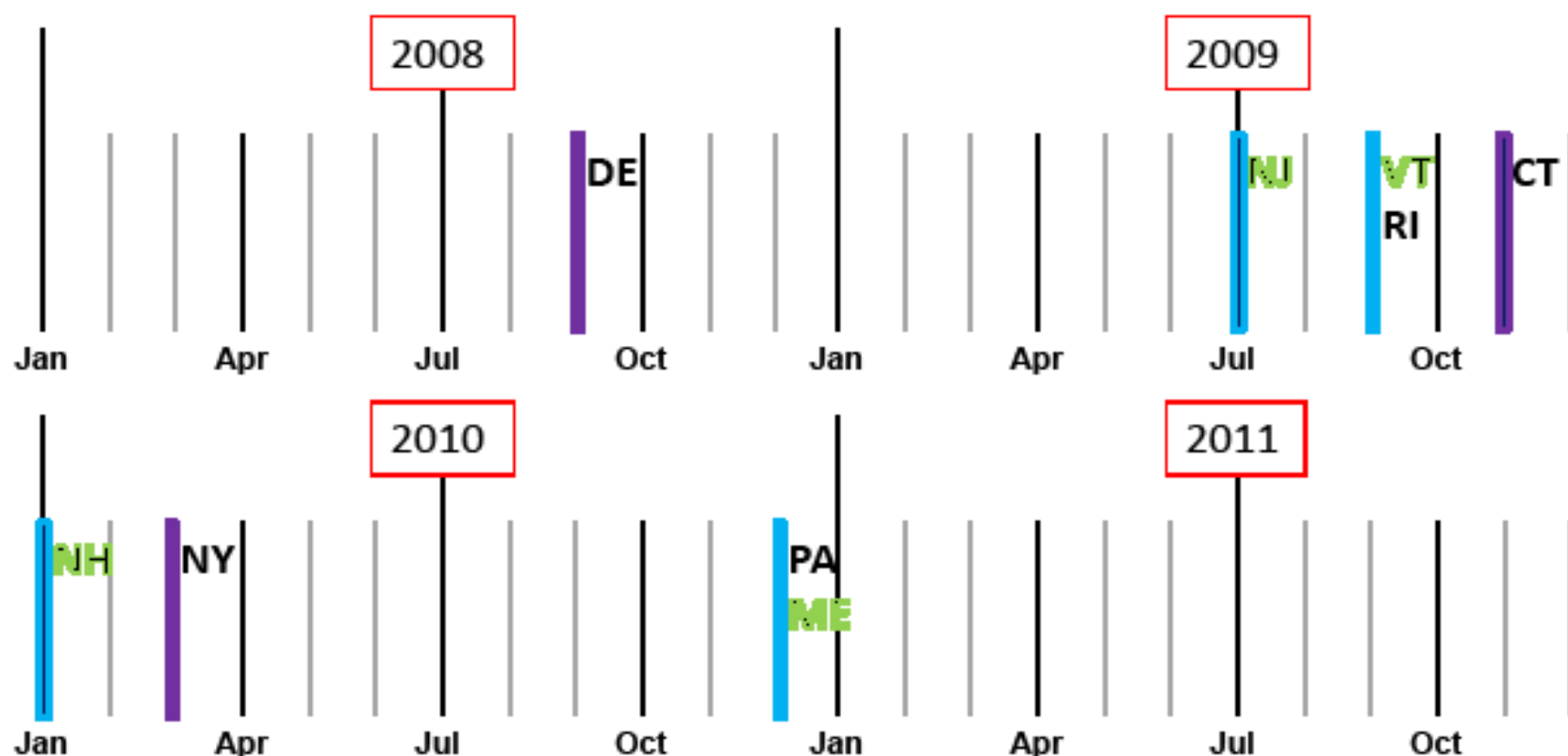
# Regional Haze Rule 40 CFR 51.308

- Outlines regional haze program requirements which establish obligations the states must meet
- Federal haze program established in 1999
- Goal: Return visibility in Class I areas to the pre-industrial state by 2064
- 156 Class I areas in the US and 11 in or near the MANE-VU Region

# Haze SIP Submission

- Rule required 12/17/07 submission of Haze SIP
  - Strategy for achieving the goal
    - Initial implementation period to 2018
    - First plan revision due to EPA by 7/1/2018 and every 10 years thereafter (required by 40 CFR Section 51.308(f))
    - Submit 5-year progress reports to EPA in form of a SIP revision following initial SIP submittal (required by 40 CFR Section 51.308(g))

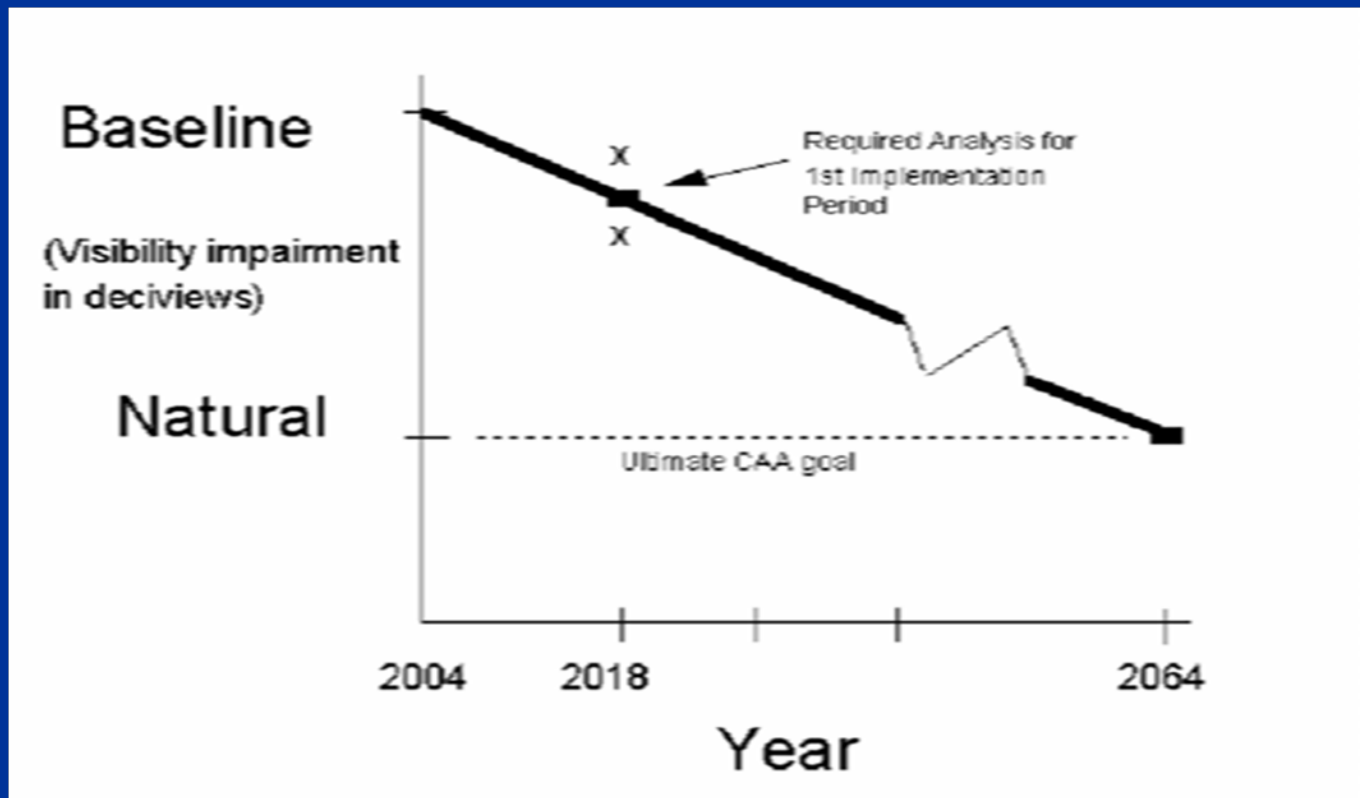
# Regional Haze Submittal Dates



MD and MA are expected to submit Haze SIPS later this year

# Reasonable Progress Goal

- Demonstrate reasonable progress toward the 2064 national visibility goal
  - “Glide Path” is the linear rate of improvement sufficient to attain natural conditions by 2064



# Reasonable Progress Goals

- Visibility improvements need to continue
- Reasonable progress must be made toward meeting improved visibility goals in Class I areas by milestone years
- Ensures continued protection of visibility of Class I areas

# Five-Year Progress Report

State must report on:

- Status of implementation measures included in RH SIP, including the emissions reductions achieved and the change in emissions.
- Current visibility conditions in the Class I areas affected by emissions from the state, and the change in the last 5 years.
- Whether the current strategy for improving visibility remains adequate to meet reasonable progress goals.

# Reporting Progress, in other words

- Did we do the control measures we said we'd do?
- Are we getting the reductions we said we'd get from the control measures?
- Are we on a path that gets us to 2064 goal?



# Five-Year Progress Report Content

States must determine adequacy of existing SIPs:

- Implementation of measures
  - BART
  - RPGs (Fuel S, 167 Stacks, additional measures)
- Inventory data for 2007 and 2011 to demonstrate changes in emissions by source category.
  - Where emissions from a major source or source category in the state have increased significantly, potential measures will be identified to reduce emissions through 2018.

# Five-Year Progress Report Content

- MANE-VU Ask - MW & SE States
  - BART, 167 Stacks, SO<sub>2</sub> reductions equivalent to our low S fuel, additional measures
  - What have they done?
- National Ask
  - CSAPR & more in 2018
  - What has EPA done?

# Five-Year Progress Report Content

- Visibility Improvement
  - June 2011 IMPROVE report shows progress
    - From the 5-year 2000-04 baseline to the next 5-year 2005-09 period at MANE-VU Class I Area IMPROVE sites, show progress at all areas.
  - 2007-2011 to be used for determining current visibility

# RH is affected by Pollutants of Interest for PM2.5 and Ozone

- Ozone (Organics and NO<sub>x</sub>)
- PM<sub>2.5</sub> (Organics, SO<sub>2</sub>, NO<sub>x</sub>, OC, EC, others)
- So, efforts to meet other NAAQS (Ozone, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>) impact RH
- CSAPR emission changes also a factor

# SIP Development Issues

- Controls for 2006 PM2.5 and 1997 ozone NAAQS (already OTB/OTW) will affect 2013 RH results
- Controls for 2011 PM2.5 and ozone will affect 2018 RH results, and
- Inventories and other background work for 2011 PM2.5 and ozone will be applicable to 2018 RH, so this work needs to be coordinated

# Withdrawal of Ozone Reconsideration

- EPA to implement the 2008 ozone NAAQS?
  - Designations were due 3.12.11
- EPA can complete designation process with 2008-2010 data
  - 120 day notice to states if designation different than recommendation
- Section 110(a) SIPs due 3.12.11

# Designation Timeline

- Designations trigger NAAQS attainment requirements
  - Attainment plans are due 3 yrs later
  - Deadline for meeting the NAAQS (3-20 yrs)
- States are required to submit infrastructure and transport SIP revisions 3 yrs after NAAQS promulgation
  - EPA can issue failure to submit findings
  - Finding triggers 2 year FIP clock for EPA

# Cross-State Air Pollution Rule

- CSAPR did not limit emissions to address the 2008 ozone NAAQS
- CSAPR 2 Timeline
  - Finding failure to submit 75 ppb transport SIP
    - 2 years to promulgate FIP (§ 110(c)(1))
  - CSAPR 2 SIP Call (§§ 110(k)(5), 176A & 184)
    - Finding that SIP is inadequate to address interstate transport
    - 18 months to submit SIP



# Present/Anticipated SIP Timelines

| <u>SIP</u>            | <u>2011</u>       | <u>2012</u>      | <u>2013</u>        | <u>2014</u>      | <u>2015</u> | <u>2016</u> | <u>2017</u>      | <u>2018</u>                        | <u>2019</u> | <u>2023</u>        | <u>2028</u>       |
|-----------------------|-------------------|------------------|--------------------|------------------|-------------|-------------|------------------|------------------------------------|-------------|--------------------|-------------------|
| <b>Haze</b>           |                   | Backgnd<br>Work* | 5-Year<br>Lookback |                  |             |             | Backgnd<br>Work* | SIP<br>Due                         |             | 5-Year<br>Lookback | Second<br>SIP Due |
| <b>2008<br/>Ozone</b> |                   | EPA<br>Designat. |                    |                  | SIP<br>Due  |             |                  | ←-----Attainment (2015-2035)-----→ |             |                    |                   |
| <b>2011<br/>PM2.5</b> | NAAQS<br>Proposal | Final<br>NAAQS   | State<br>Recomm    | EPA<br>Designat. |             |             | SIP due          | Attainment                         |             |                    |                   |
| <b>2006<br/>PM2.5</b> |                   | SIP<br>Due       |                    | Attainment       |             |             |                  |                                    |             |                    |                   |

\* Status of all RH SIP measures, emission reductions so far, visibility changes, determine if current RH SIPs enable meeting all established reasonable progress goals or if adjustments are necessary, assess monitoring strategy / sufficiency

# Key Considerations

- Align Inventory, Control Measure Development and Air Quality Modeling for the Ozone, PM2.5 and Haze SIP Efforts
  - Inventory Base & Future Year Selection (SIPs due 2015 – 2018) and Development.
  - Need to Provide Adequate Time for SIP Development (controls and modeling) and Processing
  - Need to be Done in Time for 1<sup>st</sup> SIP (Ozone?)

**Questions?**