

Chapter 12 Continuing Planning Process for Regional Haze

The Regional Haze Rule (RHR) requires each state to prepare a long-term monitoring strategy and commit to the periodic collection, reporting, and analysis of monitoring and emissions inventory data. The RHR also includes other requirements regarding periodic progress reports, State Implementation Plan (SIP) revisions, and continuing consultation. This chapter addresses these future planning requirements:

- Submitting with the SIP a monitoring strategy
- Including a commitment to update the statewide emissions inventory of visibility impairing pollutants
- Submitting periodic reports evaluating progress towards the Reasonable Progress Goals
- Determining the adequacy of the existing SIP
- Revising the SIP in 2018 and every ten years thereafter
- Continuing interstate coordination and consultation
- Continuing consultation with the Federal Land Managers (FLM)

12.1 Monitoring Strategy

Washington State will rely upon the continued existence of Western Regional Air Partnership (WRAP) and upon WRAP's provision of adequate technical support to meet its commitment to conduct the analyses necessary to meet the requirements of¹.

Washington State will depend on the Inter-Agency Monitoring of Protected Visual Environments (IMPROVE) monitoring program to collect and report aerosol monitoring data for long-term reasonable progress tracking as specified in the RHR. Because the RHR is a long-term tracking program with an implementation period nominally set for 60 years, the state expects that the IMPROVE program will provide data based on the following goals:

- 1) Maintain a stable configuration of the individual monitors and sampling sites, and stability in network
- 2) operations for the purpose of continuity in tracking reasonable progress trends
- 3) Assure sufficient data capture at each site of all visibility-impairing species
- 4) Comply with Environmental Protection Agency's (EPA) quality control and assurance requirements
- 5) Prepare and disseminate periodic reports on IMPROVE program operations

Washington State is relying on the IMPROVE program to meet these monitoring operation and data collection goals, with the fundamental assumption that network data collection operations will not change, or if changed, will remain directly comparable to those operated by the IMPROVE program during the 2000-04 RHR baseline period. Technical analyses and reasonable progress goals in this implementation plan for regional haze are based on data from

¹ 40 CFR 51.308(d)(4)

these sites. As such, the state asks that the IMPROVE program identify potential issues affecting RHR implementation trends and/or notify the state before changes in the IMPROVE program affecting a RHR tracking site are made.

Further, Washington State notes that the human resources to operate these monitors are provided by Federal Land Management agencies. Beyond that in-kind contribution, resources for operation and sample analysis of a complete and representative monitoring network of these long-term reasonable progress tracking sites by the IMPROVE program in the WRAP region are a collaborative responsibility of members of the WRAP (EPA, states, tribes, and FLMs) and the IMPROVE program steering committee. Washington State will collaborate with the EPA, FLMs, other states, tribes, and the IMPROVE committee to assure adequate and representative data collection and reporting by the IMPROVE program.

Washington State depends on the following IMPROVE program-operated monitors at the following sites for tracking RHR reasonable progress:

IMPROVE Monitoring Sites	OLYM1, NOCA1, SNPA1, MORA1, WHPA1, PASA1
Mandatory Class I Areas	Class I Area - Olympic NP, WA; Class I Areas – North Cascades NP, WA; Glacier Peak W, WA; Class I Area – Alpine Lakes W, WA; Class I Area – Mount Rainier NP, WA; Class I Areas – Goat Rocks W, WA; Mount Adams W, WA; Class I Area – Pasayten W, WA

Washington State will use data reported by the IMPROVE program as part of the regional technical support analysis tools found at the Visibility Information Exchange Web System (VIEWS) and the Technical Support System (TSS), as well as other analysis tools and efforts sponsored by the WRAP. Washington State will participate in the ongoing regional analysis activities of the WRAP to collectively assess and verify the progress toward reasonable progress goals, also supporting interstate consultation as the RHR is implemented, and collaborate with WRAP members (EPA, states, tribes, and FLMs) to ensure the continued operation of these technical support analysis tools and systems.

Washington State may conduct additional analyses as needed.

Washington State will depend on the routine timely reporting of haze monitoring data by the IMPROVE program for the reasonable progress tracking sites to the EPA air quality data system, VIEWS, and TSS. Washington State will collaborate with WRAP members (EPA, states, tribes, and FLMs) to ensure the continued operation of these technical support analysis tools and systems.

Washington State will track data related to RHR haze plan implementation for sources for which the state has regulatory authority, and will depend on the IMPROVE program and WRAP sponsored collection and analysis efforts and data support systems for monitoring and emissions inventory data, respectively. To ensure the availability of data and analyses to report on visibility conditions and progress toward Class I Area visibility goals, Washington State will

collaborate with WRAP members (EPA, states, tribes, and FLMs) to ensure the continued operation of the IMPROVE program and the WRAP sponsored technical support analysis tools and systems.

12.2 Statewide Emissions Inventory Updates

Washington State has prepared a statewide inventory of emissions that can reasonably be expected to cause or contribute to visibility impairment in Class I Areas. Chapter 5 of this plan summarizes the emissions by pollutant and source category.

Washington State commits to updating statewide emissions periodically. The updates will be used for states tracking of emission changes, trends, and input into WRAP's evaluation of whether reasonable progress goals are being achieved and other regional analyses. The inventories will be updated every three years on the same schedule as the every three-year reporting required by EPA's Consolidated Emissions Reporting Rule.

As a member of the WRAP, the state will continue to use the WRAP sponsored Emissions Data Management System and Fire Emissions Tracking System to store and access emission inventory data for the region. Washington State will also depend upon and participate in additional periodic collective emissions inventory efforts by the WRAP. Further, Washington State will continue to depend on and use the capabilities of the WRAP's regional modeling to simulate the air quality impacts of emissions for haze and other related air quality planning purposes. Washington State will collaborate with WRAP members (EPA, states, tribes, and FLMs) to ensure the continued operation of these technical support analysis tools and systems.

12.3 Periodic Reports

The RHR requires states to submit a progress report to EPA every five years evaluating progress towards the reasonable progress goals. The first progress report is due five years from the submittal of the initial implementation plan and must be in the form of an implementation plan revision that complies with EPA's public hearing and plan submittal requirements². At a minimum, the progress reports must contain the elements in paragraphs³ for each mandatory Class I Area, as summarized below:

1. Implementation status of the current SIP measures for achieving reasonable progress goals
2. Summary of emissions reductions achieved
3. Assessment of visibility conditions and changes for the most and least impaired days
4. Analysis of emission reductions of pollutants contributing to visibility impairment from all sources within the state based on the most recent updated emissions inventory, with estimates projected forward to account for emission changes during the applicable five year period

² 40 CFR 51.102-103

³ 40 CFR 51.308(g)(1-7)

5. Assessment of significant changes in anthropogenic emissions that have occurred during the five year period that have limited or impeded progress in reducing pollutant emissions and improving visibility
6. Assessment of the current SIP sufficiency to meet reasonable progress goals
7. Review of the State's visibility monitoring strategy and any modifications to the strategy as necessary.

In accordance with the requirements listed in section⁴ of the RHR, Washington commits to submitting a report on reasonable progress to EPA every five years following the initial submittal of the SIP. The reasonable progress report will evaluate progress made towards the reasonable progress goals for each mandatory Class I Area located in Washington State and located outside Washington which may be significantly affected by emissions from Washington. Washington State's review will address each of the required elements listed above. The state will also evaluate the monitoring strategy adequacy in assessing reasonable progress goals.

12.4 Determination of State Implementation Plan Adequacy

The RHR⁵ requires a state to make a determination of the adequacy of the current implementation plan as part of its five year progress report. Based on the findings of the five year progress report, the state must take one or more of the actions summarized below at the same time the state submits its five year progress report:

1. If the state finds that no substantive SIP revisions are required to meet established visibility goals, the state shall provide a negative declaration that no implementation plan revision is needed.
2. If the state finds that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from sources in another state that participated in a regional planning process, the state shall notify EPA and the other contributing state(s). The plan deficiency shall be addressed through the regional planning process to develop additional strategies through the planning efforts described in the progress report(s).
3. If the state finds that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from another country, the state shall notify EPA and provide the available supporting information.
4. If the state finds that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from within the state, the state shall revise its implementation plan to address the plan's deficiencies within one year.

Washington commits, in accordance with⁶, to make an adequacy determination of the current SIP at the same time its five year progress report is due and to comply with the requirements of⁷. If Washington determines that the current implementation plan is or may be inadequate due to emissions from within the state itself, Washington will develop additional strategies to address the plan deficiencies and revise the SIP within one year from the date that the progress report is

⁴ 40 CFR 51.308(g)

⁵ 40 CFR 51.308(h)

⁶ 40 CFR 51.308(h)

⁷ 40 CFR 51.308(g)

due. If Washington determines that the plan is or may be inadequate due to emissions from other state(s), Washington will collaborate with the other state(s) through the regional planning process for the purpose of developing additional strategies to address the plan's deficiencies. If Washington determines that the current implementation plan is or may be inadequate due to emissions from sources in another country, Washington shall notify EPA and provide the available information.

12.5 State Implementation Plan Revisions in 2018 and Later

In addition to a SIP revision made for plan inadequacy⁸, requires a state to revise and submit a comprehensive Regional Haze (RH) implementation plan revision to EPA by July 31, 2018 and every ten years thereafter. Future SIP revisions must evaluate and reassess all of the elements required under⁹ and specifically address the items listed in¹⁰. The plan revision must take into account improvements in monitoring data collection and analysis, control technologies and other relevant factors. Washington's commitments to comply with RHR requirements for future plans follow.

By July 31, 2018 and every 10 years thereafter, Washington commits to completing and submitting a comprehensive RH SIP revision to EPA, evaluating and reassessing all of the elements required under¹¹. In evaluating and reassessing these elements, Washington commits to:

1. Determining current visibility (most recent five year period preceding the required date of the SIP submittal for which data is available) conditions for the most impaired and least impaired days and determine the actual progress made towards natural conditions.
2. Determining the effectiveness of the long-term strategy for achieving the reasonable progress goals for the prior SIP period as well as include enforceable emission limitations and compliance schedules.
3. Affirming or revising the current reasonable progress goals based on assessment of new or updated information, improved technologies and on-going legislation. If the reasonable progress goal is found to be insufficient to attain natural conditions by 2064, Washington will look at additional or new control measures that could be adopted to achieve the degree of visibility improvement projected by the analysis contained in the first SIP.

12.6 Continuing Interstate Coordination and Consultation

In accordance with¹², Washington commits to continue consultation with other states which may reasonably be anticipated to cause or contribute to visibility impairment in Washington's mandatory Class I Areas. Washington will also continue consultation with any state for which Washington's emissions may reasonably be anticipated to cause or contribute to visibility impairment in those states' mandatory Class I Areas.

⁸ 40 CFR 51.308(f)

⁹ 40 CFR 51.308(d)

¹⁰ 40 CFR 51.308(f)(1-3)

¹¹ 40 CFR 51.308(d)

¹² 40 CFR 51.308(d)(3)(i)

With regard to the established or updated goal for reasonable progress, should disagreement arise between another state or group of states and Washington, Washington will describe the actions taken to resolve the disagreement in its RH SIP submittal for EPA's consideration. With regard to assessing or updating long-term strategies, Washington commits to coordinate its emission management strategies with affected states and will continue to include in its future RH SIP revisions all measures necessary to obtain its share of emissions reductions for meeting other states' reasonable progress goals.

Washington commits to continued participation in the WRAP, to the extent appropriate, and to coordinating future plan revisions with other WRAP member states in addressing regional haze. This involvement in the WRAP will contribute significantly to Washington's inter-state and FLM coordination for future SIP revisions and progress reports.

12.7 Continuing Consultation with the Federal Land Managers

Section 51.308(i)(2) of the RHR requires that the state provide FLMs the opportunity for consultation in person and at least 60 days prior to holding any public hearing on plan revisions.

Washington commits to continuing to provide FLMs the opportunity for consultation in person and at least 60 days prior to holding any public hearing on plan revisions in accordance with¹³.

Section 51.308(i)(4) requires procedures for continuing consultation between the State and FLMs on the implementation of the visibility protection program including development and review of implementation plan revisions and five year progress reports and on the implementation of other programs having the potential to contribute to impairment of visibility in mandatory Class I areas. Washington will consult with the FLMs as required by Section¹⁴. At a minimum, Washington will meet with the FLMs on an annual basis through the WRAP, as long as the WRAP continues to provide this forum. All SIP revisions will include a description of how the state consulted with and addressed any comments provided by the FLMs.

The consultation will be coordinated with the designated visibility protection program coordinators for the National Park Service and the U.S. Forest Service.

12.8 Tribal Consultation

Washington will continue to remain in contact, via the WRAP, with the National Tribal Environmental Council to keep track of possible impacts from tribes and to provide the opportunity for consultation regarding any tribal Class I Areas that Washington's emissions may impact.

¹³ 40 CFR 51.308(i)(2)

¹⁴ 40 CFR 51.308(i)(4)