

Chapter 2 Foundational Regional Haze State Implementation Plan Development

Just the term *regional haze* suggests the need for a *regional* approach to visibility impairment. This chapter provides background on regional planning to address regional haze, the role of the Western Regional Air Partnership (WRAP) in the development of this first—foundational—Regional Haze (RH) State Implementation Plan (SIP), and Washington State’s consultation with other states, tribes, and Federal Land Managers (FLMs) on foundational RH SIP development.

2.1 Regional Planning

The pollutants that lead to regional haze can originate from numerous sources located across broad geographic areas and be transported long distances. In recognition of the regional nature of haze, the Environmental Protection Agency (EPA) encouraged states to organize Regional Planning Organizations (RPOs) to coordinate regional activities related to the Regional Haze Rule (RHR). Ultimately states formed—and EPA funded—five RPOs, which collectively cover the 48 contiguous states, Alaska, and Hawaii (Figure 2-1).



Figure 2-1 Regional Planning Organizations

2.2 Western Regional Air Partnership

WRAP is a voluntary organization of western states, tribes, and federal agencies that work collaboratively to address visibility impairment in mandatory Class I Areas. The WRAP was formed in 1997 as the successor to the Grand Canyon Visibility Transport Commission (GCVTC). The 1990 Amendments to the Clean Air Act authorized the formation of visibility transport commissions and required EPA to establish the GCVTC.

The WRAP promotes, supports, and monitors the implementation of the GCVTC's June 1996 recommendations for improving visibility in the 16 national parks and wilderness areas on the Colorado Plateau. The recommendations developed by the GCVTC represent a significant milestone in the study of regional haze¹. The GCVTC's technical analysis found the customary focus on mitigating visibility impairment from stack plumes associated with stationary-point sources was insufficient to address the wide range of pollutants and sources that caused or contributed to visibility impairment across the Colorado Plateau. The GCVTC's air quality monitoring and modeling showed that part of regional haze is caused by the long-range transport (more than 100 miles) of emissions from numerous and widespread sources.

The RHR expanded the focus of regional visibility planning processes in the West from the Colorado Plateau to all western Class I Areas. The WRAP embraced this geographic expansion by expanding its role to address regional haze in all 13 contiguous western states, Alaska, and Hawaii.

The focus of the WRAP for this foundational RH SIP is regional technical analysis. The WRAP has engaged in compilation of ambient monitoring, emission inventories, air quality modeling, and data analysis. The result is a regionally consistent body of technical data and analysis to address regional haze in the West. The WRAP also provides a forum for coordination and consultation between states, tribes and FLMs.

The WRAP accomplishes this work through committees, forums, and workgroups composed of states, tribes, FLMs, EPA, and environmental, industry, and public representatives. Staff-time for these activities is contributed by the organizations. The work is supported by WRAP staff from the Western Governors' Association and the National Tribal Environmental Council. The WRAP also contracts with environmental consulting firms for analysis of air pollution data, compilation and preparation of data, and analyses of natural and/or uncontrollable air pollution sources.

2.3 Consultation

Because of its very nature, addressing regional haze involves discussions between states, tribes, and FLMs. These discussions can be as informal in nature as a discussion within a WRAP forum, committee, or workgroup or they can be a structured, formal meeting. The RHR generally allows for both and one does not preclude the other. The RHR has formal

¹ The Grand Canyon Visibility Transport Commission, *Recommendations for Improving Western Vistas*, June 10, 1996. <http://www.wrapair.org/WRAP/reports/GCVTCFinal.PDF>

requirements for a state's consultation with the FLMs administering mandatory Class I Areas within the state. This section discusses the role of consultation between the state of Washington and other states, tribes, and FLMs in the development of this foundational RH SIP.

Consultation with Other States

The RHR requires consultation between states on the development of coordinated emission management strategies.² This requirement applies both to mandatory Class I Areas within Washington, where emissions from other states are reasonably anticipated to contribute to visibility impairment, and to mandatory Class I Areas outside Washington, where emissions from Washington are reasonably anticipated to contribute to visibility impairment.

Participation in the WRAP has fostered a regionally consistent approach to haze planning in the western states and provided a sound mechanism for consultation. Consultation among the fifteen western states within WRAP has occurred through meetings of WRAP committees, workgroups, and forums with participation by conference calls, face-to-face meetings, and workshops.

Through participation in the WRAP, the western states have agreed upon the overall goals set for 2018 and the appropriateness of the strategies to achieve these goals for all mandatory Class 1 Areas in the WRAP region. Coordination through WRAP resulted in resolution of technical tasks and policy decisions in such areas as monitoring, emissions, fire tracking, BART, source attribution, modeling, and control measures. Due to this extensive coordination, this foundational RH SIP reflects Washington's implementation of a regionally consistent approach to addressing visibility impairment in the West.

WRAP staff have compiled extensive documentation on WRAP meetings and work products (through October 2007) that provides an overview of the breadth of the coordinating role of the WRAP in the planning process for foundational RH SIPs (Appendix A).

In addition to consultation through the WRAP, Ecology met with the Oregon Department of Environmental Quality at its headquarters in Portland, Oregon on January 9, 2008 for a general discussion on RH planning.

Consultation with Tribes

The WRAP recognizes the unique legal status and jurisdiction of tribes and seeks to promote policies that ensure fair and equitable treatment of all participating members of the WRAP. The WRAP also recognizes the authority and responsibility of states and tribes to develop, adopt, and implement individual state and tribal implementation plans.

Ecology's consultation with tribes during the development of its foundational RH SIP has been solely through WRAP participation. Both EPA Region 10 and the National Tribal Environmental Council (NTEC) have offered assistance in making tribes aware of the Washington State's RH SIP. However NTEC, which made its offer of assistance in August

² 40 CFR 51.308(d)(1)(iv) and 51.308(d)(3)(i)

2007, has expended its federal RH funds and there is no EPA funding currently available to NTEC for the WRAP project. The RHR has no formal requirement for consultation with tribes.

Consultation with Federal Land Managers

The RHR requires consultation between the State of Washington and FLMs on development and implementation of the RH SIP. Ecology must provide FLMs with an opportunity to comment in person at least 60 days prior to holding a public hearing on this draft foundational RH SIP. The RHR specifies that the consultation must provide an opportunity for affected FLMs to comment on the state's assessment of visibility impairment in each mandatory Class I Area and provide recommendations on the reasonable progress goals and the development and implementation of visibility control strategies to address visibility impairment.

Formal consultation requirements do not preclude informal consultation. Ecology had a number of meetings with state and national representatives of the U.S. Department of Agriculture Forest Service (USDA-FS) and the U.S. Department of Interior National Park Service (USDI-NPS) between 2007 and 2009 (see Table 2-1). The major focus of these meetings was Ecology's Best Available Retrofit Technology (BART) determinations. These discussions were helpful to Ecology. Ecology used the discussions and informal written comments from FLMs to review and revise its draft BART determinations and associated draft compliance orders. A national representative of the U.S. Department of Interior Fish and Wildlife Service (USDI-FWS) participated in a number of the meetings as a representative of the U.S. Department of the Interior (USDI).

Ecology held a formal consultation with the USDA-FS, USDI-NPS and USDI represented by the USDI-FWS on May 18, 2010. Information on Ecology's formal consultation with the FLMs on this foundational SIP is found in Appendix B. Appendix B includes the formal written comments submitted to Ecology along with a synopsis of FLM comments accompanied by Ecology's response. This information was made available to the public as part of this foundational RH SIP when Ecology issued its public hearing notice for this foundational SIP.

The continuing role of the FLMs in regional haze planning is discussed in Chapter 12, Continuing Planning Process for RH.

Table 2-1 Informal Ecology-Federal Land Managers Regional Haze State Implementation Plan Consultation

Date	FLMS	Arrangements	Topics
1/18/07	USDA-FS	Lacey, WA ³ meeting	<ul style="list-style-type: none"> • State BART activities • Potential state involvement in the Regional Haze SIP and funding
8/13/07	USDA-FS USDI-NPS	Lacey, WA meeting	<ul style="list-style-type: none"> • State plans for Regional Haze SIP and BART • Informal consultation v. Regional Haze Rule consultation requirements
11/16/07	USDA-FS USDI-NPS	Lacey, WA meeting	<ul style="list-style-type: none"> • BART-eligible sources – emission rates, exemption modeling, potential controls • FLM-suggestions for future monitoring
4/30/08	USDA-FS USDI-NPS	Lacey, WA meeting	<ul style="list-style-type: none"> • Baseline Washington Class I Areas IMPROVE monitoring • BART status • Alcoa Wenatchee primary aluminum plant exemption modeling • Draft BART determination for Alcoa Intalco primary aluminum plant • Draft BART technical analysis for Lafarge cement plant
11/20/08	USDA-FS USDI-NPS USDI-FWS	Lacey, WA meeting plus call-in	<ul style="list-style-type: none"> • Draft BART determinations: <ul style="list-style-type: none"> ○ Lafarge cement plant ○ Port Townsend Paper Corporation pulp & paper mill ○ Alcoa Intalco primary aluminum plant
2/13/09	USDA-FS USDI-NPS	Conference call	<ul style="list-style-type: none"> • Draft BART determination: TransAlta Centralia Generation coal-fired power plant
3/16/09	USDA-FS USDI-NPS USDI-FWS	Lacey, WA meeting plus call-in	<ul style="list-style-type: none"> • Revised draft BART determination for Alcoa Intalco primary aluminum plant • Draft BART determinations: <ul style="list-style-type: none"> ○ Weyerhaeuser Longview pulp & paper mill ○ BP Cherry Point oil refinery
3/23/09	USDA-FS USDI-NPS USDI-FWS	Conference call	<ul style="list-style-type: none"> • Revised draft BART determination: TransAlta Centralia Generation coal-fired power plant
8/12/09	USDA-FS USDI-NPS	Conference call	<ul style="list-style-type: none"> • Revised draft BART determination for Port Townsend Paper Corporation pulp & paper mill • Draft BART determination for Tesoro oil refinery
10/6/09	USDA-FS USDI-NPS USDI-FWS	Conference call	<ul style="list-style-type: none"> • Revised draft BART determination: TransAlta Centralia Generation coal-fired power plant
11/3/09	USDA-FS USDI-NPS USDI-FWS	Lacey, WA meeting plus call-in	<ul style="list-style-type: none"> • Revised second draft BART determination: TransAlta Centralia Generation coal-fired power plant • Cumulative visibility impacts • Washington's BART process

³ The Washington State Department of Ecology is headquartered in Lacey, WA.