

STAPPA / ALAPCO

STATE AND TERRITORIAL  
AIR POLLUTION PROGRAM  
ADMINISTRATORS

ASSOCIATION OF  
LOCAL AIR POLLUTION  
CONTROL OFFICIALS

S. WILLIAM BECKER  
EXECUTIVE DIRECTOR

August 20, 2004

Air Docket  
U.S. Environmental Protection Agency  
Attention Docket ID No. OAR-2003-0053  
Mail Code: 6102T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

To Whom It May Concern:

The State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO) are writing to submit these comments on the U.S. Environmental Protection Agency's (EPA's) Availability of Additional Information Supporting the Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule or CAIR) as published in the *Federal Register* on August 6, 2004 (69 *Federal Register* 47828). In these comments we will refer to this notice as the CAIR Notice of Data Availability or NODA.

We have several concerns with the NODA, but our primary ones are these: the lack of time to review the information and the lack of context for the information in the NODA. We will address each of these in turn.

EPA did not notify STAPPA and ALAPCO in a timely way of the CAIR Notice of Data Availability and has provided insufficient time to review the information in the NODA. The NODA states that documents were placed on the CAIR docket on or about July 27, 2004. STAPPA and ALAPCO's Criteria Pollutants Committee held a call on July 28, 2004 during which one of the scheduled agenda items was when the NODA would be available. When EPA staff taking part in the call were specifically asked when the NODA would be released, they responded that they did not know. However, just two days later, on July 30, 2004, the NODA was filed for publication in the *Federal Register*. STAPPA and ALAPCO are extremely disappointed that we were not apprised of this imminent action and, moreover, are very troubled that EPA is providing only 21 days to review and comment on the voluminous and complex material placed on the docket.

STAPPA and ALAPCO are also concerned that EPA has not published the results of using the new modeling inputs (and of using the Community Multiscale Air Quality model for PM<sub>2.5</sub>,

visibility and acid deposition). According to the NODA, EPA has made many changes to the modeling platform and inputs to the CAIR modeling. However, no results of modeling runs have been provided to indicate what impact these changes and revisions have. For example, the revised emissions from the modeling runs may change which states are included in the scope of CAIR. STAPPA and ALAPCO request that EPA make available the results of the Community Multiscale Air Quality model run and the new Integrated Planning Model run prior to finalizing CAIR and provide an opportunity for comment on EPA's interpretation of the modeling results.

Sincerely,



Brock M. Nicholson  
STAPPA Chair  
Criteria Pollutants Committee



Lynne A. Liddington  
ALAPCO Chair  
Criteria Pollutants Committee