

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

May 10, 2005

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

Dan Johnson
Executive Director
Western States Air Resources Council
500 Union Street
Suite 640
Seattle, WA 98101

Dear Dan:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), thank you for the opportunity to review the PSD Reform Recommendations (hereafter "the Recommendations") developed by the Western States Air Resources Council (WESTAR). STAPPA and ALAPCO value their relationship with WESTAR and were pleased that air quality professionals from the rest of the country were able to contribute to this important regional effort.

At the outset, we wish to commend WESTAR for the initiative and effort that went into developing the Recommendations. Moreover, we appreciate the effective and well-communicated process WESTAR used in including STAPPA and ALAPCO in all stages of this project.

Following the STAPPA and ALAPCO Membership meeting in Coeur d'Alene, the associations, at the direction of their Boards of Directors, sought volunteer members from the Permitting and Emissions & Modeling Committees to evaluate the Recommendations. The PSD Reform Subcommittee ("the Subcommittee") that emerged consisted of specialists in permitting and modeling from the States of Alabama, Florida, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, South Carolina, Texas, Vermont, and Virginia. In addition, there were local participants from Allegheny County (PA), Manatee County (FL), Pima and Pinal Counties (AZ). The group was chaired by David Thornton, Manager of Air Analysis and Environmental Data Management for the Minnesota Pollution Control Agency.

The Subcommittee held a series of five conference calls, discussing in depth several of the WESTAR Recommendations in each call. There is no doubt that the collective experience of the group with PSD increment issues was impressive. Many of the participants had been working for 15-20 years on implementing PSD, and had a wealth of experience with the increment issues raised by WESTAR relating to modeling, emissions inventories, and increment calculation. In the course of our review, several Subcommittee members, including members from Maine, Florida, Iowa, New Jersey and New York, voluntarily drafted written explanations detailing their reactions and opinions on such issues as the use of monitoring data, actual vs. allowable emissions data in emissions inventories, short-term averaging calculation methodology, data hierarchies, and periodic reviews. These papers were shared with WESTAR.

The Subcommittee shared WESTAR's basic concern that the PSD program is in need of change. As STAPPA/ALAPCO stated in our recent comments on EPA's proposed rule on NO_x Increments, "...the PSD program is difficult to administer for major sources and nearly impossible for tracking increment consumption for mobile and area sources. In fact, as the PSD program has matured, we have learned that technical compliance with the requirements of the PSD increment tracking rules has nonetheless failed in many cases to protect Class I areas. EPA should undertake a comprehensive review of the PSD program and modify the structure so as to more effectively accomplish long-term protection of Class I areas and allow for consistent and predictable analysis of emissions that impact these areas." (Emphasis added)

The Subcommittee agreed with many of the Recommendations, and strongly supported two of them. Specifically, the Subcommittee supported Recommendation #1, which states that EPA should promulgate the significant impact levels for Class I, II, and III areas that are contained in EPA's 1996 proposed PSD rule. In addition, the members expressed enthusiasm concerning Recommendation #7, which advocates that "an explicit consultation relationship be established between States and FLMs to develop policy approaches for the use of "critical loads" in Class I areas." The Subcommittee was particularly interested in collaborating with the federal land managers as a part of the Federal Land Managers Air Quality Related Values (AQRV) Group (FLAG) process when Class I areas are in issue.

However, the Subcommittee was unable to reach agreement on the Recommendations as a package. Subcommittee members thought the recommendations raised concerns about national consistency and predictability of emissions analysis and also expressed concerns about the adequacy of air quality protection that would be achieved by adjustments to modeling data and methodologies traditionally utilized for calculating increment consumption.

While the Subcommittee is not able to support the Recommendations at this time, it wishes to actively participate in any reform process that EPA initiates in the future related to PSD reform, including further discussion of the WESTAR Recommendations. Fundamental reform of this important program for preservation of air quality in our national parks and other attainment areas is long overdue, and it is likely that replacement

of the current increment system—such as critical loadings analysis for ecosystems in Class I areas—may be needed in the long term.

Thank you for this opportunity to comment on the WESTAR Recommendations. We look forward to further steps in this process and trust that we will all have an opportunity to contribute to EPA's redesign of this important Clean Air Act program.

Sincerely yours,



Roger Westman
ALAPCO Co-Chair
Emissions and Modeling Committee



David Thornton
STAPPA Co-Chair
Emissions and Modeling Committee
Chair, PSD Reform Subcommittee



John Paul
ALAPCO Co-Chair
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