

## Notarianni, Michele

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**Subject:** FW: Regional haze SIP expectations

Begin forwarded message:

**From:** "Wayland, Richard" <[Wayland.Richard@epa.gov](mailto:Wayland.Richard@epa.gov)>  
**Date:** January 29, 2018 at 7:26:10 PM EST  
**To:** "[hornback@metro4-sesarm.org](mailto:hornback@metro4-sesarm.org)" <[hornback@metro4-sesarm.org](mailto:hornback@metro4-sesarm.org)>  
**Cc:** "Wood, Anna" <[Wood.Anna@epa.gov](mailto:Wood.Anna@epa.gov)>, "Jones, Rhea" <[Jones.Rhea@epa.gov](mailto:Jones.Rhea@epa.gov)>, "Fox, Tyler" <[Fox.Tyler@epa.gov](mailto:Fox.Tyler@epa.gov)>  
**Subject:** Regional haze SIP expectations

Dear John,

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You asked about the "formal acceptability of 2011 base year emissions" for SESARM states' 2021 regional haze SIPs. In general, we think 2011 base year modeling will be appropriate for most or even all of your states for the reasons provided below. Please note that I plan to share this same information with my peers in Regions 3 and 4 so that they are aware of our position with respect to this aspect of your states' SIP development efforts.

First, there are some helpful statements in the EPA overview presentation at the December regional haze workshop in Denver (which you attended). Here is the presentation: [http://www.westar.org/Docs/regional%20haze%20workshop%202017/2017\\_12%20WESTAR%20RHR%20presentation%20Werne%20EPA%20final%20for%20distribution.pdf](http://www.westar.org/Docs/regional%20haze%20workshop%202017/2017_12%20WESTAR%20RHR%20presentation%20Werne%20EPA%20final%20for%20distribution.pdf). Specifically, on slide 9, we clearly state that "*There is no rule requirement regarding the base year for regional photochemical modeling*". The regional haze rule does not have any specific requirements as to the base modeling year used to project visibility to the future. The selection of the base year should be justified based on considerations of timing, appropriateness of emissions and meteorology, and any other relevant factors. For example, EPA does not yet have a more recent modeling platform available for state use. If SESARM states have already begun the technical work, it seems reasonable that 2011 would be the platform on which to base that technical work. Each SIP should justify the use of any particular base year based on the facts relevant to the particular state/area.

Second, the 2028 EPA regional haze modeling transmittal memo ([https://www3.epa.gov/ttn/scram/reports/2028\\_Regional\\_Haze\\_Modeling-Transmittal\\_Memo.pdf](https://www3.epa.gov/ttn/scram/reports/2028_Regional_Haze_Modeling-Transmittal_Memo.pdf)) contained many caveats about the use of the associated EPA modeling results, which were projected from a 2011 base case. However, the memo also contained the following statement:

*“For example, model performance is relatively good and model uncertainty is relatively low for some Class I areas, particularly in the eastern US. The modeling results for some of these sites may provide a reasonably accurate initial assessment of 2028 visibility levels and source sector contributions.”*

As you can see, we anticipate that 2028 visibility information projected from a 2011 base case may be useful in many areas, especially in the east where model performance was relatively good and the projections were less sensitive to inputs and uncertainties. For visibility projections to 2028, the important consideration is the credibility of the emissions inputs, meteorology, and boundary conditions. The base modeling year could be 2011 or any other more recent year, but again, should be justified and documented on a case-by-case basis.

Additionally, we think a rule provision in the regional haze rule concerning emissions inventory requirements for the long-term strategy (40 CFR 51.308(f)(2)(iii)) might be causing some confusion. EPA’s overview presentation also tried to clarify this provision, with the following statements:

*“Removed the presumption that the year of the most recent ‘consolidated periodic emissions inventory’ is the year of the baseline emission inventory on which the long-term strategy is based. This was replaced with a requirement for the state to use, but not necessarily to only use, information from the year of the state’s most recent submission to the triennial NEI, with a 12-month grace period.”*

This rule provision impacts how states develop their long-term strategies (based on four-factor analyses), but this provision does not directly apply to or affect the choice of the base modeling platform year. We would be happy to have a conversation with you and EPA Regions 3 and 4 about the ways a state could meet the requirement of 51.308(f)(2)(iii) in the context of using a 2011-based modeling platform.

You may also find the preamble discussion at 82 FR 3100-3101 informative.

If you have further questions, please let us know.

Thanks,

Chet