

# WESTAR PSD Reform Recommendations

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# Topics

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- Background
  - Issues
  - Recommendations
    - PSD Permitting
    - Increments
    - Air Quality Related Values
  - Status and Next Steps
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# WESTAR PSD Reform Initiative Workgroup

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- Workgroup membership
    - Western states
    - Federal land management agencies
    - EPA HQ and 3 Regional Offices in a consulting capacity
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# Technical Issues

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- Meteorological issues
  - 12-km grid in complex terrain
  - Limited on-site met data
- Modeling issues
  - Conducting increment analyses on a fixed schedule cannot always be justified

# Technical Issues (cont'd)

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- Emission inventory issues
  - Including area, mobile, and temporary sources in an increment analysis can greatly complicate the analysis
  - Class I increment consumption analysis - interstate and state/tribal coordination



# Policy Issues

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- Policy issues include...
  - Return on resources invested
  - Relationship between regulated pollutant and impacts
  - Time allowed to respond
    - "The cliff"
- Policy resolution » technical focus

# Recommendations Related to *Permitting*

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It ain't broke – don't need to fix it



# Recommendations Related to *Increments*

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- Manner in which increment status is determined
  - Cumulative increment analysis
    - When permit would exceed SIL
    - Periodic (5 year benchmark)
  - Emissions to exclude
    - Portable, temporary, intermittent including prescribed fires for forest health
    - Some agricultural emissions

# Recommendations Related to *Increments* (cont'd)

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- Deny permit if increment exceeded unless:
  - Mitigation
  - Enforceable emission reduction plan
- Opportunity to re-evaluate using more rigorous analysis (tiered approach)
- Sufficient time to develop emission reduction plan (> 180 days)

# Recommendations Related to *AQRVs*

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- Explicit rule language is needed to:
  - Clarify when cumulative AQRV analysis is required, and the authority permitting agencies have to address an adverse finding
  - Acceptable range of options to conduct cumulative AQRV analysis
- Flexibility in responding to cumulative AQRV adverse impact finding, but the problem must be addressed

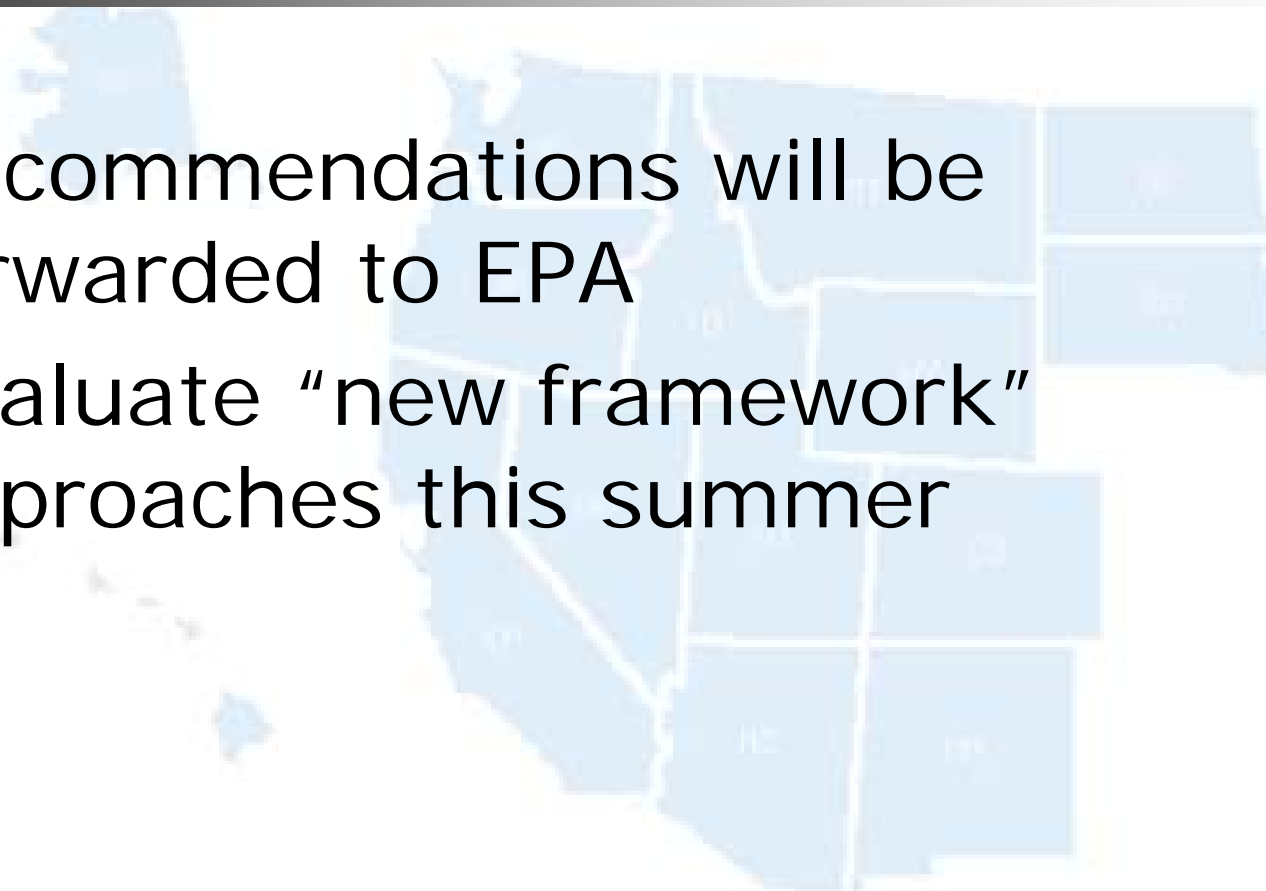
# Recommendations Related to *AQRVs* (cont'd)

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- Recognition of the FLAG guidance as an important tool, not a regulation
- Support for establishing “critical loads” to support AQRV decision-making

# Status and Next Steps

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- Recommendations will be forwarded to EPA
  - Evaluate “new framework” approaches this summer
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# Contact Information



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