



MANE-VU

Mid-Atlantic/Northeast
Visibility Union

Developing the Reasonable Progress Goal

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Step 1: Establish the Baseline for Each Class I Area

- Baseline value 1 = average of deciview values for 20% best days in each year, using 2000-2004 IMPROVE data
- Baseline value 2 = average of deciview values for 20% worst days in each year, using 2000-2004 IMPROVE data

Step 2: Develop Control Measures Using the Statutory Factors

- Identify sources and source categories
- Determine key pollutants contributing to regional haze at each Class I area on both the “worst” and “best” days
- Need to determine control strategies to achieve the RPG for BOTH the 20% best days and 20% worst days
- Identify control measures and associated emission reductions that:
 - Are “on the books” or “on the way” from existing and promulgated rules at Federal, State and local levels
 - Are potential measures for the sources that significantly contribute to visibility impairment at each Class I area, beyond OTB and OTW
 - Apply the four statutory factors to sources and control measures in each source category



Step 3: Determine Uniform Rate of Progress for Each Class I Area

- Determine natural conditions
- Using baseline values from step 1, determine the uniform rate of progress that results from each baseline value to natural conditions by 2064
- Determine the visibility improvement that the uniform rate of progress will achieve by 2018

Step 4: Select RPG and Measures to Achieve the Goal

- Combine control measures from OTB and OTW, beyond OTB/OTW that satisfy the four statutory factors, and BART into an overall control strategy and determine the visibility improvement that results from these strategies by 2018
- Compare the amount of improvement that occurs from this control strategy with that which occurs from the uniform rate of progress
- If the projected improvement is equal to/better than that achieved from the uniform progress rate, then this is the reasonable progress goal
- If the projected improvement is less than that achieved via the uniform rate of progress:
 - Consider additional measures that can be identified and that are reasonable;
 - If there are no additional measures that are reasonable, then justify why the SIP can't meet an RPG that is equal to/greater than the uniform rate of progress



Questions

- Is this process an appropriate one for the MANE-VU states with Class I areas?
 - If not, what alternatives might be better?
- What information will the Class I states need in each step of the process?
- What approaches do we need to outline for each step?
- How will non-Class I states be involved in the process?



Step 1: Establish the Baseline for Each Class I Area

- NESCAUM developing estimates of baselines for 20% worst and best days, and estimates for natural conditions
- New IMPROVE methodology due out this year for calculating natural conditions
- EPA leaving the selection of the method for calculating natural conditions to the states
- How should non-Class I states be involved in this step?



Step 2: Develop Control Measures Using the Statutory Factors

- MARAMA completed OTB/OTW analysis
- OTC workgroups and committees are now developing information on potential ozone control measures
- TSC & states to identify other possible beyond OTB/OTW control measures that will reduce haze emissions
 - Have we identified all possible sources/source categories?
 - How extensive should this list of possible measures be, given the resources we have to do this?
 - Are Class I states determining what the reasonable control measures are for all contributing states (prior to consultation)?
- Class I states to “flesh out” statutory factors
 - What is the process for this, and what information do we already have that will help satisfy this requirement?
 - Which ozone measures will need to have statutory factor information developed for them?
- How will non-Class I states be involved?



Step 3: Determine Uniform Rate of Progress for Each Class I Area

- NESCAUM developing baseline and natural condition estimates
- Calculation of glide path improvement between the baseline and natural conditions = uniform rate of progress
- What is the role of Class I and non-Class I states?

Step 4: Select RPG and Measures to Achieve the Goal

- What approach will Class I states take to decide which measures will comprise the control strategy for a Class I area, e.g.:
 - All possible measures
 - Measures above some minimum level of emission reductions/improvement
 - Particular sources/source categories based on their share of contribution
 - Some other approach
- What approach to take for identifying other reasonable measures if $RPG < \text{uniform rate}$
- How do we deal with the justification if no other measures are reasonable? Who develops it and how is it vetted?
- How will non-Class I states be involved?

Next steps

- What tools can we develop to be most helpful in the RPG development process?
- When needed?