United States Department of the Interior

FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:
FWS/ANWS-AR-AQ

August 1, 2006

Subject: Regional Haze Rule Consultation with Federal Land Management Agencies

Dear Mr. Bates:

Over the past several years, the U.S. Fish and Wildlife Service (FWS), National Park Service (NPS), and Forest Service have participated in regional planning efforts addressing ways for States, and Tribes if they so choose, to protect and improve visibility in Class I national parks and wildernesses through implementation of the Regional Haze Rule (RHR). Along with other stakeholders, we have had many opportunities to contribute to ongoing Regional Planning Organization (RPO) development of policy guidance and technical information. As States begin to develop their regional haze State implementation plans (SIPs) based on RPO work, we are interested in working directly with your staff to offer our perspective as managers of affected Class I areas and to maintain our support for an effective national regional haze program.

The primary purpose of this letter is to provide you general insights about FWS and NPS interests with respect to upcoming SIP development and consultation activities. It is not intended to dictate policy or guidance. Rather, in the enclosure to this letter we include discussion on a list of topics to enhance your understanding of our views on key SIP components. We also provide lead contacts for FWS and NPS staff that will be available to work with your staff during early phases of SIP development as well as coordinate the required formal 60-day review/consultation with the official Federal Land Manager (FLM) for the Department of the Interior.

The RHR requires States to inform the FLMs of the appropriate State contact for exchange of information regarding SIP development. Many States provided us with a contact person shortly after the RHR was published. It would be helpful if you could confirm your contact or provide a current single point of contact for your State to the individuals noted in the enclosure. Additional information regarding your SIP timelines would also be very helpful.

Our highest priority in working with you over the course of the next year and a half will be to help you develop a successful SIP. We understand the complexities of developing a plan reliant on non-linear relationships between emissions and subsequent visibility improvements. Our emphasis is to work with you and, as your partners, to ensure each plan utilizes all reasonable means to obtain realistic goals. We share the common goal of improving visibility in all Class I areas throughout the United States, and we would like to use this planning process to maximize goal achievement. Our hope is that through this communication we can complete the RHR requirement of formal consultation with ease and productivity.

We are looking forward to continuing our work with you and your staff as the regional haze SIPs are developed. Please don't hesitate to contact us with questions.

Sincerely,

Sandra V. Silva
Chief, Air Quality Branch
U.S. Fish and Wildlife Service

Christine L. Shaver
Chief, Air Resources Division
National Park Service

Enclosure

cc:
Forest Service: Rich Fisher, Donna Lamb
EPA Regional Air Division Directors
Regional Planning Organization Directors

Regional Haze State Implementation Plan Coordination
Fish & Wildlife Service and National Park Service
August 1, 2006

This document is designed to provide you general insights about U.S. Fish and Wildlife Service (FWS) and National Park Service (NPS) interests with respect to upcoming Regional Haze Rule (RHR) State Implementation Plan (SIP) development and consultation activities. It is not intended to dictate policy or guidance.

Baseline, Natural Condition, and Uniform Rate

These factors apply mainly to States that have Class I areas. Other States that contribute to visibility impairment in Class I areas should consider including discussion and conclusions on these factors in their individual plans.

As you know, the basic calculation of baseline, natural condition, and uniform rate builds the foundation for the entire RHR SIP process. Considerable discussion and debate at the science and policy level has occurred regarding appropriate methods to be used. As a consequence, several equations that include varying parameters or multipliers are available. Because these calculations can have a significant effect on the resulting progress goal, it is critical that the State provide a detailed description of the methods used in its SIP. If calculations include only portions of established methods or utilize previously undocumented or unsupported approaches, more justification should be included in the SIP or its supporting documentation. We encourage States to consider calculations that are based on equations recommended by the IMPROVE steering committee and that are consistent with recommended approaches from the appropriate RPO and Environmental Protection Agency (EPA) region.

Emission Inventories

Given the complexities associated with modern, comprehensive emission inventories, considerable effort should be placed on describing how these inventories were developed and used. We would like to see emission descriptions demonstrate an evolution that includes: an actual, base-year inventory used to evaluate model performance; a typical, base-year inventory that represents the five year, average condition which establishes modeled visibility impacts; and various future year, control scenarios (e.g., for required air pollution control programs or long term strategy measures) that demonstrate future visibility conditions. It would assist our review if future year inventories were clearly partitioned to delineate source types (by text, charts, or graphics) that are included in each model simulation. Improved future visibility conditions claimed in the SIP that are not also clearly identified in a future inventory or are not clearly included in future model analysis, will likely need additional and possibly considerable, attention and justification.

One part of your emission inventory includes the implementation of "Best Available Retrofit Technology" (BART) on a subset of pre-Prevention of Significant Deterioration sources. BART source identification, elimination, and control determinations will be of particular interest for review. We would prefer to see a clear progression through the

three basic BART phases and a thorough description of the RHR prescribed factor analysis (if applicable). Discussions should clearly identify whether BART control levels apply to individual or grouped source categories.

Area of Influence

As you are aware, the area of influence of significant, visibility-impairing sources is an important SIP element. This area should clearly be identified or apportioned by State, or other geographic means, to encompass emission sources that contribute significant levels of pollutants to each Class I area as identified in your regional haze SIP. As such, these areas should be developed in conjunction with neighboring States and Tribes. Discussions of source areas of influence at both the base- and future-year levels can help establish a strong showing for SIP progress. States should consider the benefits of presenting this information in the form of transported mass by pollutant or through individually calculated visibility impairment indices. Using a percentage or "Top 10" ranking for current contributions by geographic area may not clearly describe progress over time.

Reasonable Progress Goals and Long Term Strategy

As you also know, establishing reasonable progress goals for Class I areas in your State and/or acknowledging reasonable progress goals for Class I areas in other States that are affected by emissions from your State, as well as defining associated emissions strategies to meet these goals, form the basis of the SIP process under the RHR.

In developing the Long Term Strategy (LTS) required by the RHR, your State has broad flexibility when determining reasonable progress goals and associated emissions. As noted earlier, the RHR includes a requirement for States to assess a uniform rate of progress and compare that rate to the reasonable progress goals set by those States with Class I areas. We believe that this uniform rate of progress assessment is useful in determining the geographic and economic extent a State should consider when developing the LTS associated with the reasonable progress goals.

In general, we are looking at the degree to which the LTS is supported by RPO technical work and at the level of consistency among the contributing States. For Class I areas where the State is setting a 2018 reasonable progress goal of equal or less impairment compared to the uniform rate of progress, it would assist our review to present information on how local, regional, and national emission strategies were considered and applied to address visibility impairment broken down by source category.

For Class I areas where the reasonable progress goal is more impaired than the uniform rate of progress, States should consider presenting additional information on a component basis. Components could consist of emission source categories as before, but also include contributions from individual pollutants or by geographic source area. Our intent is to better understand where and why a strategy falls short of the uniform progress rate goal. Because each region has focused their emission control strategy on different conditions, presenting results in a component format may assist in showing what level of progress was made in the focus area, versus other less controllable factors.

Fire

Your State has considerable flexibility as it addresses all anthropogenic sources of visibility impairment, including fire. The RHR requires consideration of smoke management techniques for agricultural and forestry management practices in the development of the LTS part of the SIP. On a short-term basis, fire, both natural and anthropogenic, has the potential to cause significant visibility reduction in Class I areas. If anthropogenic fire contributes to the index used to track long-term, reasonable progress in a Class I area, the visibility SIP should identify how it will be addressed. Your State may already have a smoke management program (SMP) that adequately describes how visibility impairment from fire will be addressed. If fire has been determined to contribute to visibility impairment, the SIP should contain a comprehensive emissions inventory for all fire emissions and a statement relating to its accuracy. It should also identify whether or not fire emissions are projected to increase, decrease, or stay the same, and how these projections were determined. For those States with a SMP, the SIP should identify its type, i.e., a basic smoke management program or an enhanced smoke management plan, and if the plan has been certified consistent with EPA's *Interim Air Quality Policy on Wildland and Prescribed Fire*. It would also be useful to know specific SMP requirements for minimizing visibility impairment in Class I areas and classification of the various types of wildland fire (wildfire, prescribed fire, and wildland fire use fire) as either natural or anthropogenic. Any differences regarding the regulation of agricultural burning versus prescribed burning by private, State or Federal land managers should also be identified with discussion of the basis for any differences provided.

Regional Consistency

The Regional Planning Organizations (RPOs) have been working toward regionally-consistent approaches to address visibility impairment throughout the SIP development process. There may be circumstances when different methods were used or impairment assessments reached different conclusions. We understand that each State knows what emission control methods or air quality management strategies work best for its areas. Each State may wish to develop strategies that are independent from their RPO or neighboring areas.

In this context, our review of "regional consistency" will have less to do with individual discretion each State has in making decisions, and more on how well a group of States identifies and addresses similar goals for each Class I area within a common area of influence.

Regional consistency can also be difficult to evaluate if neighboring SIPs (or portions of SIPs) are released for review at different times. It is our hope that thorough inter-State consultation processes will lead to consistent descriptions of apportionment and emission control goals, thus resulting in development of similar progress goals, regardless of release dates.

Verification and Contingencies
Little emphasis has been placed in the RHR on verification and even less on contingency planning. Each SIP must identify monitoring data as part of the original baseline and should include continued monitoring data collection and assessment as part of an ongoing progress review at five year intervals. Given the uncertain future of any individual monitoring site, the SIP should address the representativeness of both primary and alternative data sites.

We encourage States to not only consider the need for these data to measure progress, but also how the plan accounts for and reconciles both unexpected and reasonably foreseeable emissions growth, changes to the geographic distribution of emissions, and substantive errors that may be found in emission inventories or other technical bases of the SIPs. These factors, as well as other unanticipated circumstances, may adversely affect your State's ability to achieve the emissions reductions projected by the SIP. Considering these factors through adaptive management or routine review processes may assist in mitigating these circumstances.

Coordination and Consultation
The 1999 RHR requires States to consult with the Federal Land Management agencies at least 60 days prior to holding any public hearing on a RHR SIP or SIP revision (40 CFR 51.308(i)). Specifically, the Federal Land Manager (FLM) for the Department of the Interior (DOI) is the Assistant Secretary for Fish and Wildlife and Parks. However, assistance in the development and technical review of Regional Haze SIPs will be conducted by the FWS Branch of Air Quality and NPS Air Resources Division.

To help facilitate consultation with the FLMs, each Bureau has developed a review strategy that includes a single point of contact for all interaction with us. For your State, primary DOI contact names are:

Tim Allen
U.S. Fish & Wildlife Service

Mailing Address:
7333 W. Jefferson, Suite 375
Lakewood, CO 80235
Phone: 303-914-3802 Fax: 303-969-5444
Email: Tim_Allen@fws.gov

Bruce Polkowsky
National Park Service

Mailing Address:	Overnight Packages:
NPS-ARD	NPS-ARD
P.O. Box 25287	12795 W. Alameda Parkway
Denver, CO 80225	Lakewood, CO 80228
Phone: 303-987-6944	Fax: 303-969-2822

Email: Bruce_Polkowsky@nps.gov

All questions and inquires regarding formal or informal consultation can be directed to these contacts. We would appreciate communications in electronic form as much as possible. This will allow us to quickly share appropriate documents among staff and between agencies. The contacts listed above will also be able to inform you of additional resources and information we can provide. Resource and information examples include progress reports, discipline experts, or implementation advice. Although the RHR places a strong emphasis on individual discretion in developing these plans, the NPS and FWS would be happy to provide more specific suggestions or information, in a form most useful to you, upon request.

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United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

August 9, 2007

N3615 (2350)

Mr. Glenn Shankle, Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Shankle:

We are writing concerning our mutual interest in protecting visibility in Clean Air Act-designated Class I national parks and wilderness areas in and near Texas. The State of Texas invited the National Park Service (NPS) and Fish and Wildlife Service to review and comment on its efforts to develop a State Implementation Plan (SIP) addressing the requirements of the Federal Regional Haze Rule (RHR) (40 CFR 51.300-51.308). Our review identified potential inconsistencies between the objectives of the RHR and the procedures the State of Texas uses for notifying the Federal Land Management (FLM) agencies of potential effects on Class I areas from new or modified major stationary sources.

SIPs developed under the RHR are designed to make reasonable progress toward the national visibility goal of no manmade impairment in Class I areas. The timeline is to achieve the goal by 2064. The SIPs, however, have incremental planning cycles of ten years, with midcourse five year reviews to ensure that the plans are on track. A key element of these plans and the midcourse reviews is continued communication with the FLM agencies on progress toward the visibility goal and updated information on the veracity of the original assumptions in the plan, including the emission projections and new source growth.

The ongoing consultation is a mechanism for Texas and the FLM agencies to work together to ensure that future changes in air pollution emissions are reflected in the SIP and are not impeding progress toward the visibility goal. One key mechanism for this ongoing collaboration already exists through the Prevention of Significant Deterioration (PSD) program, but is not being effectively communicated to the FLM agencies. The RHR anticipated that states could rely on a strong visibility analysis in PSD permitting as the basis for assuring that new and modified major stationary sources would not interfere

with the goal of improving visibility. As part of this consultation process, notification should be provided to the FLM agencies on all major stationary source permits that have the potential to affect air quality related values, including visibility, in Class I areas in the state and in neighboring states. However, Texas, unlike most States, only notifies the applicable FLM agency of these major industrial sources on a limited basis.

Given our mutual interest in protecting the visibility of Class I areas in and near Texas, we would ask that our agencies be notified of PSD permits that have the potential for impacting Class I national parks and wilderness areas, commensurate with the consultation we have had with the regional haze plan. Current guidance would suggest that the State should notify the appropriate FLM agency of any proposed PSD source located within 100 kilometers of a Class I area, and of "very large" sources located greater than 100 kilometers away. We have a number of workable suggestions for how to quickly evaluate which sources to consider and would appreciate the opportunity to discuss this with your staff.

We appreciate working with your agency to improve visibility in our Class I areas and hope to strengthen that working relationship in the PSD arena. If you have any questions regarding this matter, please contact Bruce Polkowsky at 303-987-6944 or Tim Allen at 303-914-3802.

Sincerely,

for

Christine L. Shaver, Chief
National Park Service
Air Resources Division

Sandra V. Silva

Sandra V. Silva, Chief
Fish and Wildlife Service
Branch of Air Quality

cc:
Greg Nudd
Texas Commission on Environmental Quality
MC 206
P.O. Box 13087
Austin, Texas 78711-3087

Follow-up on Texas' Consultation Conference Calls on
Big Bend and Guadalupe Mountains National Parks in Texas
September 24, 2007

Areas and Pollutants Important in Contributing to Haze in the Two Texas Class I Areas

Figures 1and 2 show the modeled pollutant contributions to Big Bend and Guadalupe Mountains National Parks and the areas to which the modeling attributes the contributions.

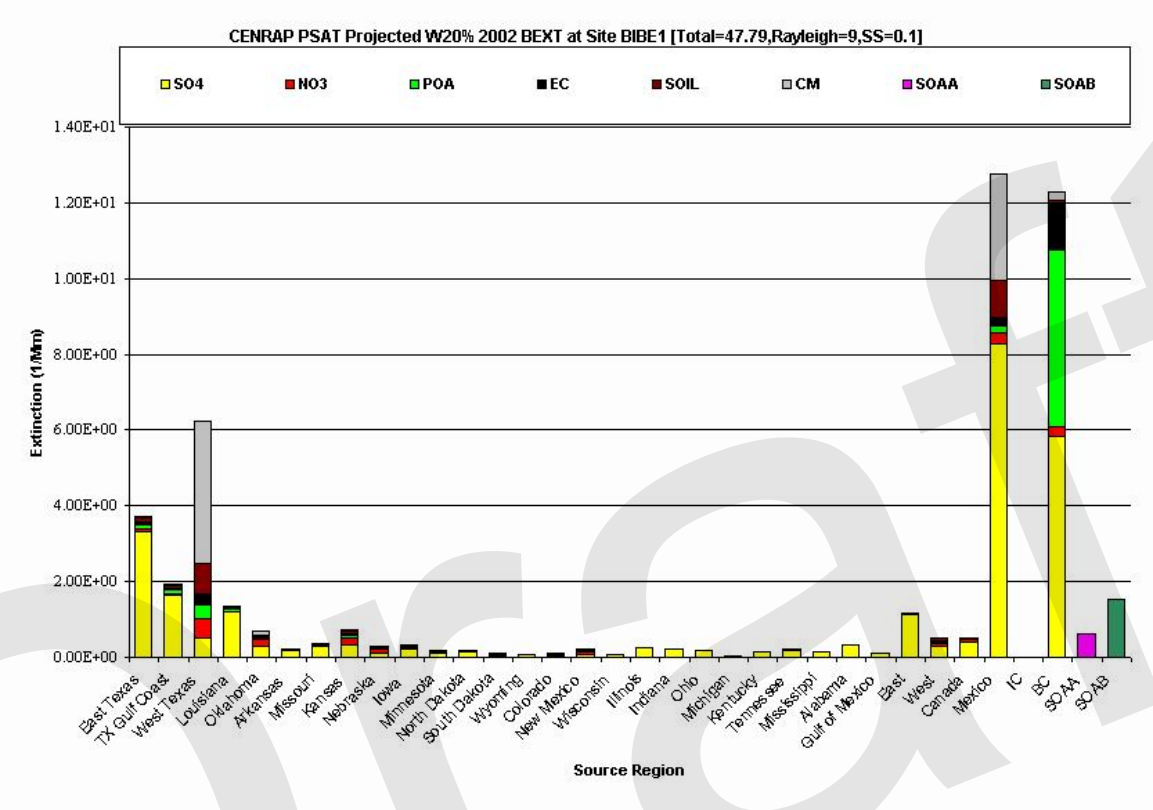

Figure 1: Areas and Pollutants Causing Regional Haze on the Worst 20 Percent of Days at Big Bend in 2002

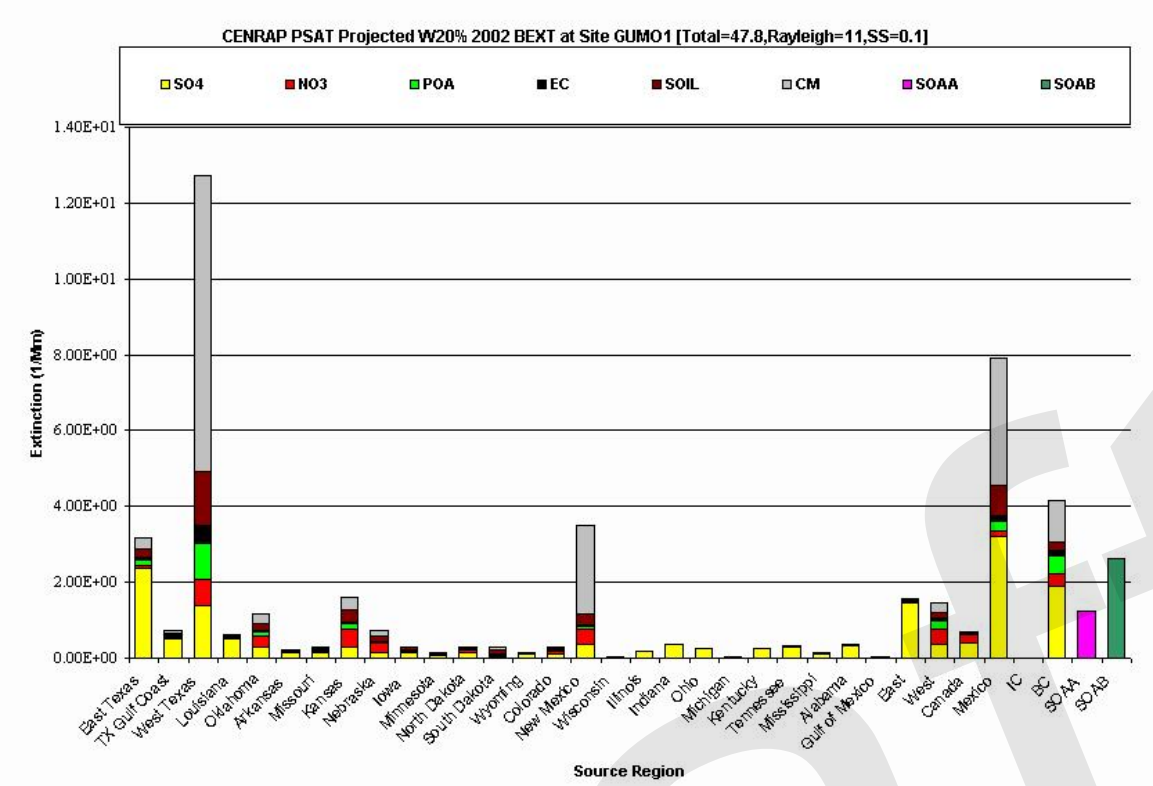

Figure 2: Areas and Pollutants Causing Regional Haze on the Worst 20 Percent of Days at Guadalupe Mountains in 2002

The main anthropogenic emissions that affect visibility Class I areas in Texas and neighboring states are SO_2 and NO_X. There is a much smaller anthropogenic PM impact in Texas from stack, engine exhaust, and fine soil emissions compared to SO_2 and NO_X. Although the contribution of anthropogenic VOC to the formation of secondary organic carbon PM is small, there is a contribution. The impact of coarse mass and fine soil at the two Texas Class I areas comes primarily from natural dust storms and dust blowing from the Chihuahuan Desert, which the modeling does not represent well. Dr. Halliday's paper on *Estimating Natural Conditions Based on the Revised IMPROVE Algorithm* discusses and documents the predominance of these natural impacts (http://www.tceq.state.tx.us/implementation/air/sip/bart/haze_sip.html). The modeled impact of wild fire and prescribed burning emissions on primary organic carbon is uncertain because of questions about the accuracy of fire emission inventories, but the modeled results projected to measured organic carbon concentrations shows that fires are the main source of the impacts that the modeling calculates.

Figure 1 shows the modeled impact of different areas and pollutants to visibility impairment at Big Bend on the worst 20 percent of monitored days in 2002. The projected impact shown in the figure uses the modeling results scaled to measured pollutant concentrations according to the EPA's modeling guidelines. The primary organic carbon captured in the modeling is largely from fire. The term "primary" refers to a pollutant emitted directly to the atmosphere. The term "secondary" refers to a pollutant formed in the atmosphere by reaction, condensation, or both. The modeling indicates that primary organic carbon at Big Bend comes overwhelmingly from boundary

conditions, which include the areas of the Yucatan and Central America with extensive agricultural burning and sometimes wildfire emissions each April and May.

Baseline and Natural Visibility Conditions, Uniform Rates of Progress and Reasonable Progress Goals for Texas' Class I Areas

Figures 3 and 4 below show the uniform rate of progress (URP or glide path) lines for each park calculated using the best available site-specific estimates the TCEQ had for 2064 natural conditions. To select the worst 20 percent days for 2064, the TCEQ presumed that the anthropogenic impacts are zero by 2064. This left a set of worst 20 percent days that have higher dust impacts than the base period worst 20 percent days. For the Big Bend and Guadalupe Mountains conference calls, the TCEQ distributed a technical analysis that documents the large impact of natural blowing dust conditions in West Texas. This technical paper is at the TCEQ website: http://www.tceq.state.tx.us/implementation/air/sip/bart/haze_sip.html

Because of these considerations and because of the sparse population and human activity in areas near these parks, the TCEQ is using the approximation that coarse mass and fine soil at the two West Texas Class I areas are natural for the worst 20 percent days. For the other $PM_{2.5}$ components the TCEQ used the Natural Conditions II estimates, although there is substantial uncertainty about the natural portion of organic carbon. The EPA's *Guidance for Estimating Natural Visibility Conditions Under the Regional Haze Program* (EPA-454/B-03-005), Section 3, "Refined Estimation Approaches Regional and Site-Specific Application" allows site-specific estimates of natural conditions. The TCEQ plans to revisit the natural condition estimates for the five-year review and the 2018 regional haze state implementation plan (SIP) revision.

Table 1 shows the site-specific estimates the TCEQ has developed for natural conditions at the two Texas Class I areas. The graphs in Figure 5 and Figure 6 compare the glide paths using Natural Conditions II natural conditions estimates with the TCEQ site specific estimates.

Table 1: Site-Specific Estimates of Natural Conditions at the Two Texas Class I Areas

Estimate of Natural Visibility Conditions		
Class I Area	**Haze Index (deciviews)**	
	Most Impaired	**Least Impaired**
Big Bend	10.1	2.3
Guadalupe Mountains	12.3	2.1

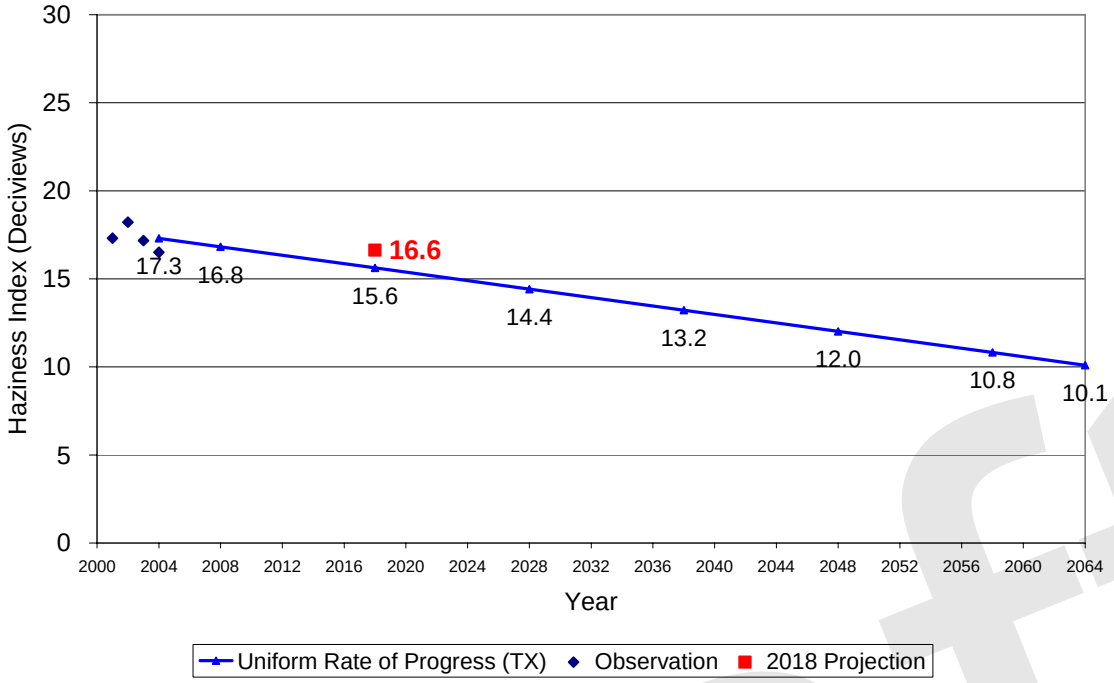

Figure 3: Glide Path for Big Bend Worst 20% Days

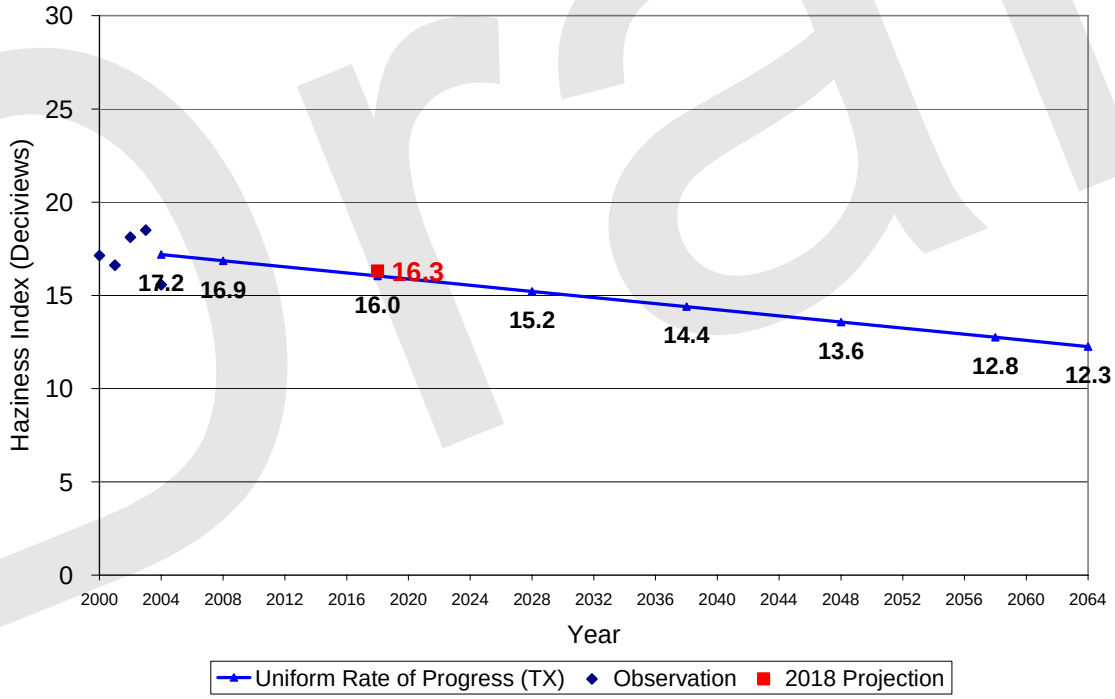

Figure 4: Glide Path for Guadalupe Mountains Worst 20% Days

The 2018 reasonable progress goals (RPGs) use 2018 CENRAP modeling projections for all components except coarse mass and fine soil. For these two components, the TCEQ projected average 20 percent worst day conditions as unchanged in 2018 from the average for the base period. The RPGs include all on-the-books emission limitations the TCEQ had adopted at the time the states submitted their emission inventories for

CENRAP modeling. The CENRAP emission inventory for this modeling has been updated to include the available EPA's estimates of the refinery SO_2 reductions that will result from the EPA refinery consent decrees.

The CAIR estimates used to develop the RPGs are from the CENRAP modeling, which included issued permits in addition to the Integrated Planning Model 2.1.9 estimates. The CENRAP IPM plus permitted SO_2 emissions estimate for electric generating units in Texas for 2018 is approximately 350,000 tons per year. The CAIR 2015 cap is approximately 225,000 tons per year for Texas.

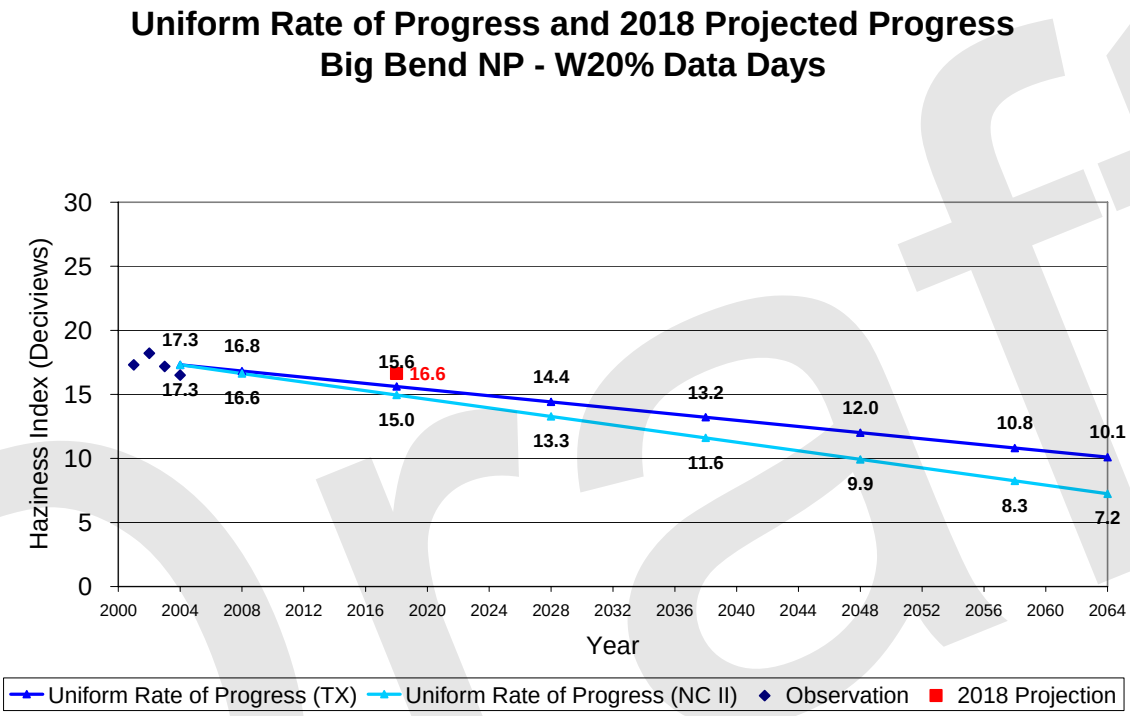

Figure 5: Glide Paths for Big Bend National Park Calculated Using Site-Specific 2064 Natural Conditions Estimates and Natural Conditions II Committee Estimates

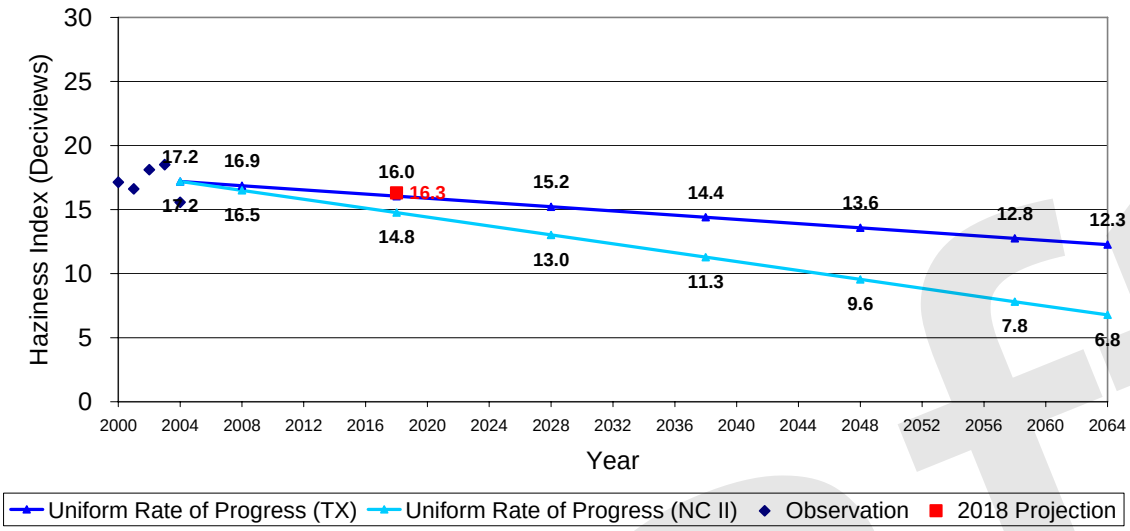

Figure 6: Glide Paths for Big Bend National Park Calculated Using Site-Specific 2064 Natural Conditions Estimates and Natural Conditions II Committee Estimates

Table 2: Reasonable Progress Goals for Class I Areas (Best 20 Percent Days)

Class I Area	Baseline Visibility (dv)	Projected 2018 Visibility (RPG) (dv)	Improvement by 2018 at RPG (dv)
Big Bend	5.8	5.6	0.2
Guadalupe Mountains	5.9	5.7	0.2

These RPGs reflect visibility improvements from emissions reductions associated with the FCAA, the Texas Clean Air Act, Texas' ozone SIP revisions and rules, and agreements between EPA and oil refineries for SO_2 emission reductions. These RPGs do not include additional emissions reductions from implementing the Texas BART rule and new rules adopted in the recent May 23, 2007, Dallas-Fort Worth eight-hour ozone attainment demonstration SIP revision. Adoption of all of these emissions reductions requirements occurred after the time cutoff for the modeling to calculate the RPGs for the worst 20 percent days and the best 20 percent days.

Setting the Reasonable Progress Goals for the Texas Class I Areas

Some of the TCEQ's emissions reductions requirements have gone beyond FCAA requirements and continue to go beyond some federal requirements. Texas requirements that go beyond federal requirements include:

- opacity limits and sulfur compound emission limits on grandfathered facilities and best available control technology (BACT) requirements for new and modified sources that typically go beyond EPA new source performance standards (NSPS) and cover more sources than the federal requirements.

Texas' requirements adopted since EPA issued the July 1, 1999, Regional Haze Rule include:

- extensive NO_X emission limits on existing and new sources including major, minor, and area sources including some on a statewide basis;
- financial incentive programs to accelerate the implementation of new, cleaner diesel engine technologies in on-road and non-road applications (TERP);
- CAIR for both SO_2 and NO_X (CAIR requirements in Texas extend over 480 miles west of the CAIR requirements in other states. Texas is the only CAIR state not bordering or east of the Mississippi River.),
- financial incentives for scrappage of older gasoline-powered on-road vehicles.

The TCEQ considered additional controls beyond those already adopted. Given the cost and insignificant effect of additional controls, uncertainty of CAIR impacts, and significant international sources of visibility impairment (all discussed below), the TCEQ considers it unreasonable to require additional controls at this time.

Reductions Required to Meet the Uniform Rate of Progress

The TCEQ's analysis of point source reductions, extrapolated to estimate the amount of reductions that would be required to meet the URP for the Texas Class I areas produces the results (Table 3).

Table 3: Emissions Reductions Required to Meet Uniform Rate of Progress

Class I Area	Additional Improvement Needed to Meet URP (dv)	Approximate Additional Pollutant Reductions SO_2 and NO_X (tpy)	Estimated Cost of Additional Reductions
Big Bend	1.0	3,700,000	$6,500,000,000
Guadalupe Mountains	0.3	1,100,000	$1,900,000,000

Table 3 assumes that all of the reductions needed to meet the URP would come from Texas. These additional reductions would require significant overcontrol in order to compensate for the impacts of international pollution. The preamble to the July 1, 1999, issuance of the Regional Haze Rule clearly says that states are not required to carry out compensatory overcontrol to make up for the lack of progress in reducing the impacts of international transport.

To meet the goal of natural visibility at Big Bend, a better understanding of how pollutants are brought into the area is needed so that the correct sources can be addressed. (This also reinforces the point that progress at the Texas Class I areas, especially at Big Bend, is dependent upon reducing emissions from Mexico and Central America). In the regional haze SIP, the TCEQ plans to ask EPA for federal efforts to reduce the international transport impacts on regional haze coming into the United States across Texas' southern border.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 15, 2007

Mr. Steve Thompson
Executive Director
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Dear Mr. Thompson:

I'm writing in response to your August 3, 2007 letter regarding the improvement of visibility in the Wichita Mountain National Wildlife Refuge.

The Texas Commission on Environmental Quality (TCEQ) agrees that the modeling shows Texas to be a significant source of visibility impairing pollution in the Wichita Mountains. As you know from our agencies' work together in the Central Regional Air Planning Group, there will be significant reductions in emissions from Texas in the next several years, and visibility at the Wichita Mountains will improve as a result of these reductions. We will continue to work with the Oklahoma Department of Environmental Quality (DEQ), the United States Environmental Protection Agency (EPA), and the appropriate Federal Land Managers (FLMs) to take reasonable actions to ensure continued improvement in visibility at Class I areas.

Your recent letter focused on the potential impact of new and modified major sources. Your first request was for the opportunity to comment on best available control technology determinations for Prevention of Significant Deterioration (PSD) sources that have significant impact on the Wichita Mountains. More precisely, you asked to review applications for sources if modeling predicts a five percent or higher impact on light extinction in a given year. We appreciate your use of a significant impact level to determine which applications you want to review. You are welcome to review these applications and provide your comments as part of our public review and comment period. We will notify the Oklahoma DEQ, along with the relevant FLM, whenever modeling indicates that a proposed source may significantly impact the Wichita Mountains.

Your second request is that Class I impact reviews be required for all proposed PSD sources within 300 kilometers of a Class I area. Unlike your proposed criteria above, this does not take into account the size of the source or meteorology. The TCEQ is urging the EPA to adopt significant impact levels for Class I reviews so that there is a consistent approach across the country to requiring Class I reviews. In the meantime, the TCEQ is committed to working with the FLMs on mutually acceptable criteria for determining when a proposed PSD source should conduct a Class I review. We will inform you of the outcome of those discussions.

We look forward to continuing to work with Oklahoma on improving visibility at the Wichita Mountains and at other Class I areas. If you have any questions, please contact Greg Nudd, P.E., of the Air Quality Division by email at gnudd@tceq.state.tx.us or by phone at 512-239-1247.

Sincerely,

Glenn Shankle, Executive Director
Texas Commission on Environmental Quality

GS/GN/vs