**Regional Haze – 2nd Planning Period Questions and Answers**

**Topic:** Emissions Inventory years and RPGs questions specific to WRAP approach (received via R8)

*Note: The answers are specific to the questions from WRAP, and may not apply to all cases in all regions*

## Does 2017 or more recent data need to be used for modeling of Reasonable Progress Goals (RPGs)?

* No, there is no regulatory requirement for 2017 or more recent emissions data to be used for modeling to support the development of RPGs. (under 40 CFR 51.308(f)(3)).  States may use older emissions data for modeling used to meet the 308(f)(3) requirements, though states are encouraged to follow air quality modeling guidance in selecting emissions that are used.

* Supporting statements
  + From the final regional haze preamble: (82FR 3100)

“The final regulations use the ‘‘emissions information on which the State’s strategies are based’’ to refer to the inventory that is used to assess the contribution that sources make to visibility impairment and not to the base year inventory used to model the RPGs.”

“The final version of 40 CFR 51.308(f)(2)(iv) does not address the question of the year to be used as the base year for emissions modeling of the RPGs.”

* + From the Regional Haze guidance (Guidance on Regional Haze State Implementation Plans for the Second Implementation Period) (p. 47)

“There are no requirements in the Regional Haze Rule regarding the method and tools used to project the RPGs, e.g., the details of the air quality modeling platform including the base period of air quality data and the year of the base modeling inventory.”

## EPA determined that 2017 or more recent data must be used for evaluating possible control measures, but for states that are not using 2017 or newer data for their base year modeling, are they required to show how their base year emissions compare to the 2017 or newer data for all source categories?

* Not necessarily. The requirement in 51.308(f)(2)(iii) applies to, among other things, emissions information “on which the State is relying to determine the emission reduction measures that are necessary to make reasonable progress.” The main purpose of the additional emissions evaluation requirement is to identify source emissions that may be higher in the more recent data (e.g. new sources or emissions that are higher due to increased operation). However, if it is readily apparent that use of 2017 or newer emissions information would not impact a State’s decisions with regard to source selection or four-factor analysis, it may be reasonable to not go through the process of comparing the older and newer emissions information for a source or source category. The state should explain what information was considered and whether and how the newer data had any impact on source selection and evaluation of potential control measures.

* Supporting statement
  + From the Regional Haze guidance (p. 18)

“While it may not be reasonable for a state to revise its work to entirely rely on emissions information from the most recent NEI submission year at the source selection step, the state should consider updating its source selection work in whole or in part to incorporate this more recent information if it is reasonable to do so.

Another reasonable option for a state to satisfy the requirement in section 51.308(f)(2)(iii) of the Regional Haze Rule, when it is not possible to fully incorporate the more recent information in all the source selection analysis steps, may be to verify in a reasonable manner, for some or all of the state’s sources, that there are no important differences between the older and new emissions information that can be expected to affect the selection of sources. In most cases, the state should focus on source sectors that may have experienced increased emissions in the most recent NEI or new sources that did not exist in the previous inventory.

For example, if a state has used 2014 information to select sources (directly, or as the starting point for a 2028 projection) and if for that state the most recent NEI submission year is 2017, the state could compare the 2014 and 2017 emissions for some sources. If 2017 emissions from a source the state has not selected are lower than its 2014 emissions, the state could reasonably conclude that using the 2017 information would not have resulted in the source being selected if the analysis had been based only on 2017 emissions information. If 2017 emissions are higher than 2014 emissions, further consideration of that source may be appropriate.

In addition, another way the state could use information from the most recent NEI submission year is to use such information in the subsequent analysis of control options, to the extent it is reasonable to do so.”