

APPENDIX 6.

Section 309 & Grand Canyon Visibility Transport Commission Report Requirements

(bold text is staff interpretations of and comments on the requirements)

1. Period covered for the plan must be for all of 12/31/2003 through 12/31/2018.
2. Projection of visibility improvement for each of the 16 Class I Areas on the plateau expressed in deciviews, it must be based upon implementation of all the measures in the Commission report and the provisions of section 309.

The 309 projection of visibility improvement must be based on the implementation of all of the recommendations of the GCVTC report and the requirements of section 309. If you do not include a recommendation you must explain why it was not feasible to implement or include the recommendation as an enforceable control measure.

3. Clean Air Corridors
 - a. Identification of clean air corridors

The method to determine a clean air corridor remains undefined. The technical forums of the WRAP have taken a shot, but the methodology wasn't well received by the Initiatives Oversight Committee. Also, it is not readily understood what it means to be in or out of a clean air corridor, i.e., what requirements apply.

- b. Within the clean air corridor: Identification of patterns of growth with significant emissions increases that are causing or could cause visibility impairment

Growth projection could be very controversial, let alone projecting the types of emissions controls that may be applied if there is a significant impact determined. Also, the definition of significance is being discussed and may come down to something like the FLAG report definition of significance - 5% of natural background.

- c. Outside clean air corridors: Identification of significant emissions growth that could begin to impair visibility in class I areas

Same as above.

- d. An analysis of the effects of the increased emissions if they are projected

Same as above.

- e. Identification of measures to protect against future degradation

Same as above.

- f. Additional GCVTC report recommendations

- Improve regional tracking and monitoring
- Establish triggers for additional action

4. Stationary Source Reductions

- a. Monitoring and reporting of sulfur dioxide emissions

- Must demo a 13% reduction between 1990 and 2000

This has been completed by the WRAP through the development of the ANNEX.

- Provision for reporting to the regional planning body

This has not yet been completed, but sounds like a timeline activity to report information that would also be reported to the Administrator. It should not be an additional reporting requirement or the generation of additional information, just sending it to another mailing address, possibly on a different timeline.

- b. Criteria and procedures for a market trading program

Developed in the WRAP Annex

- c. Provision for activating a market trading program

Developed in the WRAP Annex

- d. Provisions for market trading program compliance reporting

Developed in the WRAP Annex

- e. Provisions for stationary source NO_x and PM
- Emission control strategies
 - Degree of visibility improvement
 - Evaluate and establish emission milestones

The WRAP market-trading forum is beginning to address these requirements, but has not gotten very far along the path of development. This effort may be years in the making.

- Provision for any necessary long term strategies and the application of BART requirements no later than 12/31/08

This is a similar provision to the requirements of the current visibility SIP and LTS for Class I Areas. It does not mean that we have to develop a provision for the installation of BART at some point down the road, but we have to look to see if there is a need for it and make plans if there is the need.

Additional GCVTC Report Recommendations

- Review compliance with targets and establish incentives
- Develop an improved monitoring and accounting system

Additional monitoring sites throughout the west have been installed, but many still claim that the network is insufficient to adequately depict the problems with regional haze. In Colorado there has been substantial criticism about the lack of monitoring sites on the western slope to identify haze plumes coming into the state from western states. EPA has determined that the IMPROVE network is sufficient to characterize regional haze and is moving forward under that determination.

5. Mobile sources
- a. Current and future projected state-wide annual inventories for VOC, NO_x, SO₂, elemental carbon, and fine PM for 2003 – 2018.
- b. A determination of significant contribution to visibility impairment in any of the Class I areas

The process to determine significance will be the argument here. Some of the interests involved are starting to think that the significance level is the FLAG report significance level. The FLAG report sets the significance level at 5% of natural background. This may be a very small number.

- If significant contribution:
 - Establishment of an emission budget for the areas of significant contribution

This emission budget does not have anything to do with conformity. Not exactly sure how it would be implemented or enforceable, but most likely to be similar to any other SIP measure, if it were exceeded then some set of contingency strategies would need to be implemented.

- Establishment of an emission tracking and reporting system

Additional GCVTC Report Recommendations

- Establish clean fuel demonstration zones
- Analyze pricing and incentive approaches

6. Fire programs

- a. Documentation that all prescribed fire programs evaluate visibility impacts at Class I areas from smoke in the planning process

The Colorado program already considers the visibility impacts from smoke from prescribed fire, submission of the program elements should be sufficient.

- b. Development of a statewide emission inventory and tracking system (spatial and temporal)

Currently, Colorado maintains an emission inventory and tracks emissions from prescribed fire. However, the frequency of tracking may be an issue, some are looking for real time tracking for some prescribed fire. Also, agricultural emissions inventory and tracking may be an issue. We can probably use estimation techniques to determine agricultural emissions inventory, but tracking of agricultural emissions from fire may be a challenge.

- c. Removal of administrative barriers to the use of alternative to prescribed fire.

The Fire Emissions Joint Forum is currently working to identify what the administrative barriers might be and how a state might go about trying to remove those barriers from the uses of alternatives to prescribed fire.

- d. Development of enhanced smoke management programs that consider visibility effects from smoke and are based on efficiency, economics, emission reduction opportunities, land management objectives, and reduction of visibility impact

The Fire Emissions Joint Forum is currently in the process of trying to identify what it means to have a program based on efficiency, economics, emission reduction opportunities, land management objectives, and reduction of visibility impacts. A product should be forthcoming in the next few months.

- e. Establishment of annual emission reduction goals for fire

This is the establishment of an emission reduction goal for each state. It would need to address the emissions from agricultural fire, however, may not need to include (in the short term) an emission reduction goal for agricultural burning.

Additional GCVTC Report Recommendations

- Promote public education programs
- Improve integrated assessment of emissions
- Develop cooperative funding mechanisms

7. Area Sources of Dust Emissions from Paved and Unpaved Roads

- a. Impact assessments
- b. Significance determinations
 - If significant – emission reduction strategies

8. Pollution Prevention

- a. Initial summary of all P2 programs in place
- b. Inventory of all renewable energy capacity/generation in place or planned as of 2002
- c. Inventory of total energy capacity and production in state
 - Identification of percent renewable energy
- d. The states projected contribution to renewable energy goals for 2005 and 2015

- e. Programs that provide incentives to go beyond compliance or achieve early compliance
- f. Program to preserve/expand energy conservation efforts
- g. Opportunities for use of renewable energy where energy is currently lacking
- h. Short and long term emission reduction goals from renewable energy, energy efficiency, and P2
- i. Description of program that state uses to achieve renewable energy goals

Additional GCVTC Report Recommendations

- Model the effects of renewable energy and pollution prevention
 - Support the development of renewable energy sources
 - Introduce product labeling
9. All other recommendations of the Commission that can be practicably included as enforceable measures.

Additional GCVTC Report Recommendations

- In and Near Areas: Develop strategies for nearby communities and activities
10. Submit periodic reports to EPA in 2008, 2013, 2018
- a. The report must assess the areas for reasonable progress and must contain:
 - A status of implementation of all measures in the plan
 - A summary of the emission reductions achieved
 - Assessment of 20% best and worst days
 - Analysis of the emission tracking of pollutants impairing visibility in the Class I area
 - Assessment of significant changes in anthropogenic emissions in and out of the state
 - Assessment of whether plan elements will meet reasonable progress goals
 - Review of visibility monitoring strategy