



IN REPLY REFER TO:

# United States Department of the Interior

## NATIONAL PARK SERVICE

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



May 12, 2011

N3615 (2350)

Deborah Jordan  
Director, Air Division  
U. S. Environmental Protection Agency Region 9  
75 Hawthorne Street  
San Francisco, California 94105-2901

Dear Ms. Jordan:

We understand that EPA Region 9 is currently reviewing Nevada's Regional Haze Implementation Plan to determine approvability. The purpose of this letter is to request that EPA Region 9 not propose to approve the Nevada Regional Haze Plan as submitted because the Plan does not include a reasonable progress analysis as required in Section 40 CFR 51.308 (d) (1) of the Regional Haze Rule.

The National Park Service and the U. S. Fish and Wildlife Service have reviewed draft State Implementation Plans under the Regional Haze Rule for forty-seven states and the District of Columbia. We have looked for national consistency in implementation of the Rule. The Nevada plan does not include the required reasonable progress analysis. As Nevada's plan would be only the second state plan to be proposed for full approval by EPA, approving the plan without the required reasonable progress analysis would set a poor precedent and make it more difficult to require other states to complete an adequate reasonable progress analysis. We recommend that EPA only partially approve the Nevada plan at this time, and that you ask Nevada to conduct additional analyses for reasonable progress.

Section 308 (d) (1) (i) requires:


In establishing a reasonable progress goal for any mandatory Class I Area within the State, the State must:

- (A) Consider the costs of compliance, the time necessary for compliance, the energy and non-air quality environmental impacts of compliance, and the remaining useful life of any potentially affected sources, and include a demonstration showing how these factors were taken into consideration in selecting the goal.

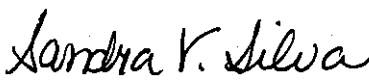
The Nevada plan does not include an analysis that meets the requirements stated above. At a minimum, the emissions data for Nevada as developed by the Western Regional Air Partnership (WRAP) should be used to identify source categories or specific sources that should be considered in a reasonable progress analysis. The WRAP provided a four factor analysis for major point source categories that could be used to identify control options and associated range of costs. Point sources could be screened using a simple ratio of emissions to distance to the nearest Class I area. Using this technique, we find that Nevada Energy's North Valmy power plant in the north central part of the State should be considered to determine if there are reasonable controls that could be implemented during the current planning period. We strongly discourage EPA from allowing Nevada to wait until the next planning period to consider reasonable progress for this facility because that would set a poor precedent for other states.

We appreciate the opportunity to work closely with EPA to improve visibility conditions at our National Parks and Wilderness Areas. For further information regarding our comments, please contact Pat Brewer of the National Park Service at (303) 969-2153.

Sincerely,

  
for Carol McCoy  
Chief, Air Resources Division  
National Park Service

Sincerely,

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

cc:

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