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U.S. Environmental Protection Agency
EPA Docket ID: [EPA-HQ-OAR-2023-0262](https://www.regulations.gov/document/EPA-HQ-OAR-2023-0262)

Re: U.S. Environmental Protection Agency's Proposed Rule "*Regional Haze Third Implementation Period; Extension of the State Implementation Plan Due Date*", Docket ID Number: EPA-HQ-OAR-2023-0262

To Whom It May Concern:

The Arizona Department of Environmental Quality (ADEQ) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) proposed rule "*Regional Haze Third Implementation Period; Extension of the State Implementation Plan Due Date*."¹

ADEQ was established under the Environmental Quality Act of 1986 by the Arizona State Legislature as the state's cabinet-level environmental agency. ADEQ carries out several core functions including: planning, permitting, compliance, management, monitoring, assessments, cleanups, and outreach. ADEQ's mission is to protect and enhance public health and the environment.

This comment letter will address ADEQ's support for the proposed extension of the regional haze state implementation plan (SIP) due date and request that EPA consider an additional change to the existing schedule for the regional haze SIP revisions and progress reports.

1. ADEQ supports the proposed deadline extension

ADEQ supports EPA's proposal to extend the due date for the next required regional haze SIP revision from the current due date of July 31, 2028, to a revised due date of July 31, 2031. ADEQ agrees that the current deadline does not allow enough time for SIP development in consideration of EPA's intent to revise the regional haze rule, which will determine the scope of planning requirements for the third period. EPA rightly notes that extending this deadline will also allow states to achieve and consider emissions reductions from air quality programs other

¹ See EPA-HQ-OAR-2023-0262. Accessed at: <https://www.federalregister.gov/documents/2024/12/23/2024-30212/regional-haze-third-implementation-period-extension-of-the-state-implementation-plan-due-date>.

than regional haze, such as nonattainment SIP planning and various 111(d) plans such as those required for methane emissions and the power sector.

2. ADEQ requests that EPA consider extending the due date for third implementation period progress reports

EPA's proposed deadline extension for the third implementation period notes that it is "not proposing to amend the due date for third implementation period progress reports, which remain due in 2033."²

ADEQ requests that EPA consider extending the progress report deadline by the same duration as the proposed extension for SIP submittals. Under the proposed SIP deadline extension to 2031, this adjustment would extend the progress report deadline for the third implementation period to 2036. This revised timeline would align with the general practice of progress reports being due roughly midway through the implementation period.

Given that regional haze progress reports have historically taken at least a year and a half to complete and are intended to provide updates on implementation of the most recent regional haze SIP, it would be unreasonable to require the progress report to be completed only 2 years after the revised SIP deadline. Furthermore, there would be little meaningful information on visibility and emissions data available by 2033 to analyze trends since the submission of the third implementation plan in 2031. For example, because the National Emissions Inventory (NEI), upon which much of the progress report analysis is based, is published on a three-year cycle, limited new data would be available to evaluate emission trends in a progress report due only two years after the revised regional haze SIP.

3. Conclusion

ADEQ appreciates the opportunity to provide comments on EPA's proposed SIP deadline extension for the third regional haze implementation period. While supporting the goals of the regional haze rule to reduce visibility impairment at federal Class I areas, ADEQ also requests that EPA consider extending the deadline for progress reports in the third implementation period.

If you have any questions, please contact Air Quality Improvement Planning Section Manager Kelly MacKenzie at (602)-784-1603 or at mackenzie.kelly@azdeq.gov.

Thank you for your consideration of ADEQ's comments.

² 89 FR 104471, 104474

Sincerely,

DocuSigned by:
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Hether Krause

Air Quality Division Deputy Director