10/1/2026 WESTAR Planning Committee Meeting Notes

1. Call to Order- Morgan Frank (AK)

a. Notes for this call: California

- Present: Alaska, AZ, CA, CO, Hawaii, ID, MT, ND, NM, NV, OR, UT, Clark County, Albuquerque, Denver Regional Air Quality Council, NPS

2. Discussion Items

a. New Source Performance Standards for Residential Wood Heaters (Nick Czarnecki, Alaska)

- EPA must propose NSPS Subpart AAA revisions by 12/15/26
- EPA expecting to meet that deadline, but public comment will be inconvenient
- **ACTION ITEMS: Prepare to file comments during holiday window, mid Dec to mid Jan, 30 days**
    - Prioritize BSER basis, method integrity, transparency, and loophole closure
    - Coordinate w/ WESTAR planning committee on comment letter
    - Feel free to join the NRH task force!
- PM2.5 designations drive urgency (pending existing legal challenges), deadline to finalize EPA PM2.5 designations by 2/7/27
    - EPA designations guide planning and control
    - Wood-smoke areas need credible NSPS to ensure clean woodstoves
- EPA's woodsmoke certification program has too many flaws and inaccuracies, as determined by the Inspector General
- Beginning all the way back in 2020, states started raising concerns about the test methods
- EPA committed to improvements in April 2023, significant investment towards it
- But beginning in 2025, there was backsliding from EPA
- Where is EPA heading?
    - IDC will not be included in Dec 2026 proposal (timing)
    - 2026 certifications using ASTM E3053 variants and approved with major deficiencies
    - Signals return toward E3053 style compliance
- Certification today: Case Example (509 Fabrications)
    - Numbers look good, but doesn't mean anything because method is so suspect
    - EPA is normalizing flexibility rather than fixing methods
- Comment Track #1: Best system of emission reduction (BSER) and emission thresholds
    - EPA must justify BSER and emission limits with representative testing
    - States should question EPA's decision to abandon IDC
    - Without IDC, states should question what data basis EPA uses to set thresholds
- Comment track #2: close loopholes and fix program
    - EPA commitments to OIG report
        - Ex: promote independence between labs and 3rd party certifiers
    - NRH task force recommendations

b. Model Rule for Residential Wood Heaters (Jay, WESTAR)

- Been working on since April, still in progress
- Is a response to expectation that the new NSPS proposal will not be helpful
    - Need to revise test method to reflect real world use
    - New rule will be based on these new test methods
    - Would require a secondary certification for wood stoves (one from EPA, one run through NESCAUM w/independent lab)
        - That way works for anybody that adopts this model rule, states won't have to take on certification themselves
    - Hopefully rule will be flexible enough that the states can just adopt whatever parts they want to
    - Will be discussed at National Residential Wood Heating conference

c. EPA Reconsideration of North Dakota's Regional Haze SIP (David Stroh, North Dakota) (link: Federal Register :: Air Plan Approval; Reconsideration and Repeal of Air Plan Partial Approval and P…)

- A lot of work done by western states to get RH SIPs right last planning period
- ND regional haze timeline:
    - Aug '22 - SIP submittal, and some Round 1 items at the same time
    - July '24 - EPA partial approval and disapproval
        - LTS, RPGs, FLM consultation disapproved (LTS not approvable, so RPGs and FLM could not be approved)
        - EPA disagreed with outcome of 4 factor analysis
    - Aug '24 - ND writes public comment on why full approval is appropriate
    - Dec '24 - EPA finalized partial disapproval
    - Jan '25 - ND files petition for review, in-state sources file petition for reconsideration
    - Apl '25 - EPA grants reconsideration, (this month is when EPA also came out with their new URP policy w/ West Viriginia)
    - Jun '25 - Petition for review is held in abeyance
    - March '26 – EPA approval of remaining Round 1 elements (single source NOx controls)
    - Sep '26 - EPA proposed approval. Two reasons:
        - FCC v Fox, administrative agencies can change their mind about their policy as long as it's reasonable and well-explained
        - New URP Policy
        - ND would've liked it if they had leaned more on the evidence ND had stated previously; ND planning on commenting to provide more for the public record, though will agree with the conclusions; will not focus on the URP policy; lean more into the fact that it's a visibility rule and not an emission reduction rule, the increased wildfires and how they contribute to visibility; Canada's anthropogenic emissions; EPA's sources that need attention
- ND waiting on round 3 RHR revisions, hoping to get round 2 SIP across the line
- Q&A:
    - HI also appealing partial disapproval, waiting on round 3
    - Did ND talk to EPA about not including URP Policy in the approval?

- ND: seems like direction comes from EPA HQ, not regional offices

3. Actions/Updates

a. New Actions/Updates

i. EPA finalized the "Partial Repeal of the Carbon Pollution Standards for Fossil Fuel-Fired Electric Generating Units" and proposed repealing all other greenhouse gas emissions standards for power plants.
ii. EPA issued a final rule to clarify the agency's existing policies concerning when and whether Clean Air Act (CAA) program "applicable requirements" should be reviewed, modified, and/or implemented through the CAA's title V operating permits program.
iii. Oct 13th - EPA holding test method roundtable for residential wood heating, contact Nick Czarnecki, Alaska for more details
iv. Air Quality Planning - Introduction to Controls for Moderate Ozone NAAs- October 15. Register on AirKnowledge.
    a. Will be helpful to learn about NAA even if your state does not have to worry about ozone
v. Rocky Mtn Wildfire Smoke Symposium, October 15 & 16: Smoke Symposium | The Montrose Lab
vi. CMAS, October 19-21, Raleigh, NC
vii. Residential Wood Heating Conference, October 20-21, Portland, OR (register here: National Residential Wood Heating Meeting - open only to state, local, tribal, or regional agency st…)
viii. Intermountain West Ozone Exchange, October 26-28
ix. Tuesday October 27th @ noon Mountain Time for the Residential Wood Smoke Working Group; Topic: lead absorbed in trees that then gets combusted
x. WESTAR-WRAP Fall Business Meeting, October 28-29, Boise, ID
xi. November 10-13, 2026 - Air & Waste Management Association Atmospheric Optics: Aerosols, Visibility, and the Radiative Balance

4. Next Call

November 5, 2026, 10:00 AM HST; 12:00 PM AKDT; 1:00 PM PDT; 2:00 PM MDT; 3:00 PM CDT