information on the emission sources in the Columbia Plateau region of eastern Washington (which includes both the Spokane and Wallula nonattainment areas). The report attempts to determine gross annual emissions from anthropogenic and nonanthropogenic sources of PM-10. Preliminary information is presented indicating that about 40% of the annual emissions in eastern Washington are from anthropogenic sources and 60% from nonanthropogenic sources. No attempt was made to estimate the highest 24hour emissions which, depending on the location, is expected to vary greatly. As discussed previously, the emission inventory information suggests, but does not conclusively show, that nonanthropogenic sources contribute significantly to the Wallula nonattainment area.

The emissions inventory estimating actual emissions generally appears to be accurate and comprehensive consistent with the requirements of section 172(c)(3) of the Clean Air Act and national guidance.4 Although, recent information from studies being conducted in eastern Washington indicate that the emission factors used for wind blown dust in the SIP revision are probably inappropriate, EPA thinks that the assumptions were the best available at the time the plan was prepared. The Columbia Plateau PM-10 Project will include the development of emission factors specifically for eastern Washington and preparation of regional emission inventories that will be used to update the Wallula plan.

One additional emission inventory issue relates to the actual and allowable emissions from stack sources. Ecology used highest actuals in the 1991 SIP submission. For one of the point sources, a papermill, allowable emissions are much greater (by a factor of 9) from the actual emissions used in the plan. However, by using the higher allowable emission estimates submitted in the September 6, 1995, letter, the papermill still only represents less than 1% of the emission inventory.

EPA proposes to take no approval or disapproval action on the emission inventory at this time. EPA is requiring, as well as participating in, the development of a detailed emission inventory as part of the Columbia Plateau project. When completed the detailed emission inventory will be used to supplement the current one.

3. RACM (Including RACT)

As noted, the initial moderate PM–10 nonattainment areas must submit provisions to assure that RACM (including RACT) are implemented no later than December 10, 1993 (see sections 172(c)(1) and 189(a)(1)(C)). The General Preamble contains a detailed discussion of EPA's interpretation of the RACM (including RACT) requirement (see 57 FR 13539–45 and 13560–61).

The current Wallula emission inventory identified wind blown dust as the dominant contributor of PM-10 emissions. There are two principal sources of windblown dust: Undisturbed land and agricultural fields. Ecology submitted an analysis of RACM for agricultural sources of PM-10 based on soil conservation measures required by the federal government's implementation of the United States Department of Agriculture's (USDA) Food Security Act (FSA) of 1985, in the Wallula nonattainment area and surrounding areas. EPA Title I preamble guidance suggests states "rely upon the soil conservation requirements (e.g. conservation plans, conservation reserve) of the Food Security Act to reduce emissions from agricultural operations" (see 57 FR 18072)

EPA proposes to accept Ecology's RACM analysis and concludes that RACM is being applied to agricultural sources not only in the nonattainment area but throughout the region surrounding Wallula. Ecology did not evaluate the application of reasonable controls on undisturbed lands. This analysis will be accomplished as part of the Columbia Plateau PM–10 Project.

The 1991 SIP revision contained a commitment from Ecology to adopt provisions of the FSA into state regulation. Ecology has not developed such a regulation. EPA proposes to determine that Ecology need not develop, adopt and submit state regulations that accomplish the same results as the current federal law and regulations. Such action would be unnecessary since the federal government (USDA) has the primary responsibility for implementation, and enforcement, of provisions of the FSA.

Where sources of PM–10 contribute insignificantly to the PM–10 problem in the area, EPA's policy is that it would be unreasonable (and would not constitute RACM) to require the implementation of potentially available control measures. 57 FR 13540. Further, EPA has indicated that for some sources in areas which demonstrate attainment, RACM does not require the implementation of otherwise available control measures that are not

"reasonably" available because their implementation would not expedite attainment (See 57 FR 13543).

In the Wallula situation, RACM for agricultural windblown dust is necessary and all other sources combined do not meet the de minimus guidance for requiring RACM. Even though not required under PM–10 SIP development guidance, Ecology did justify that RACM (including RACT) requirements were being met for two additional sources in the Wallula nonattainment area. Boise Cascade paper mill and the Simplot Feeders Limited Partnership cattle feedlot were evaluated by Ecology and found to be implementing RACM.

The only major (greater than 100 tons per year) stationary source facility within the nonattainment area, the Boise Cascade paper mill, was evaluated in the 1991 SIP submittal. Ecology concluded and documented that RACT is being applied to all stack sources in the facility. The SIP revision does not include any additional control of stack emissions. However, Ecology's RACT analysis did note that one unpaved road needed paving to meet RACT for fugitive dust sources within the facility. Ecology's June 23, 1994 letter documented that the road was paved, thus meeting the final RACT requirement. EPA proposes to accept Ecology's determination and considers the papermill to be at RACT.

The second source, the cattle feedlot, was determined by Ecology as meeting RACM in the 1991 SIP submittal. In 1992, new owners of the feedlot implemented an additional dust abatement measure, a sprinkler system to further reduce fugitive emissions. EPA proposes to accept Ecology's determination of RACM being applied at the feedlot.

EPA is proposing to grant a temporary waiver of the attainment date to December 31, 1997, which will allow Ecology and EPA to determine conclusively the significance of anthropogenic and nonanthropogenic sources impacting Wallula. This action does not relieve the area from the requirement to implement RACM. In the Wallula situation EPA thinks the significant source, as well as the two less significant sources, of PM-10 in the area have been reasonably controlled. Thus, EPA thinks it would be unreasonable to require other smaller sources of PM-10 in the area to implement potentially available control measures or technology. Further, EPA believes implementation of such additional controls in this area would not expedite attainment.

⁴The EPA issued guidance on PM–10 emissions inventories prior to the enactment of the Clean Air Act Amendments in the form of the 1987 PM–10 SIP Development Guideline. The guidance provided in this document appears to be consistent with the