

**Meeting notes
309 coordinating committee
Conference call February 5, 2004**

All 309 states were represented:

WRAP board meeting April 6-7 Tempe

Amicus Briefs:

Copies of CEED comments on Annex were sent out. AG's got copies. Brian Finneran to follow up with OR AG. on this. AZ, Phelps Dodge, several others are intervening.

The preparation of the consolidated Amicus brief is mostly up to the 309 state AG's, AZ in lead. State air agencies provide information as requested.

Schedule is for briefs to be filed by April 27

2003 milestone checks:

Each state will compile 2003 QA'd SO₂ EI, send on to WRAP by September (EDMS). WRAP will do comparison relative to Annex milestones. Draft report due from WRAP December 31 for public comment. In March 2005 WRAP will finalize. Part of the report will incorporate other factors (settlements, smelter startups, etc.) that would cause adjustments to milestones. This is not thought to be large. The rule requires that states are responsible for this report, but may delegate this to the RPO. The 309 Coordinating group will originate report to WRAP for submittal to EPA.

EDMS status review:

Pechan is prime contractor, with sub-contractors. UNC will provide the hardware and host EDMS. The target is to have a system ready to take in EI data in CRR format in late June, and to have a fully operational EDMS by October. Capabilities will include CAC, Annex SO₂ tracking, fire, road dust, modeling files for RMC, etc.

It was suggested it would be useful to create a consistent form for 309 EI submittals. The scope of work for Pechan includes hosting a workshop in April or May, to assemble states re: CRR submittals. Plan for side meeting with 309 states to coordinate submittal format, content.

Better-than-BART analysis:

Oregon SIP declared that Annex (SO₂) is better than BART. UT copied Oregon language. AZ wants to make sure future modeling runs don't contradict BtB conclusion.

There has been some discussion of re-running the model with five, instead of nine 309 states, but there is not a specific element for this in the RMC 2004 workplan. Generally, RMC is to get the modeling tuned up this year, using preliminary 2002 EI's, etc., then re-do 2002 base-case in 2005 with all factors running, including missing emissions from several source categories and using five, instead of nine 309 states.

AZ will have to do something prior to 2005. WY may also need to do something prior, but needs to talk internally.

Discussion of inconsistencies in submittal dates (2007/2008)-need for alignment of RH regulation and statute:

Current RH rule requires 309 states to deal with other Class I areas by 2008. Recent statute amendments require harmonized SIP dates, with next submittals due in 2007. The rule should be reconciled with the new statute. How to do it? There are also reporting requirements in the rule with a 2008 date. There is general concern about doing work out of synch. Several options may be possible. Pat will write up a short issue paper, check with Bill G. Send out to all for comment. This issue should be WRAP-wide, not just 309. Maybe IOC could be the home for resolution.

Next call:

March 3, 10:00 MST, (312) 461-9324, Access number, 869711