

Below are notes from a May 24, 2004 call to coordinate the first pre-trigger SO<sub>2</sub> monitoring reports and comparison to the milestone.

\* Representatives from 5 of the 6 affected agencies were on the call.

\* All participants agreed with EPA's proposal to advance most of the 309 SIP revision requirements to coincide with the 308 due dates.

\* There was much discussion about oil & gas emissions and how to distinguish "paper" changes from real emission changes and how these relate to milestone comparisons and future SIP revisions. This issue is now better understood by the participants and should remain on our "radar screens". Not knowing if or when this will be an issue, there was no consensus that the contractor (see below) or any one else should establish a procedure for adjusting the emission estimates at this time. However, there was agreement to flag it as a potential issue in the contractor's SOW. Also, some agencies (e.g., UT) may consider updating their emission reporting requirements to include sources (e.g., flares) which are already included in other states' inventories (e.g., WY's).

\* PQA contract -- Participants agreed that hiring PQA under a cap of \$22,000 would be a good use of resources, especially given their experience in these types of reports and some uncertainties which remain in the process (e.g., those noted above). A revised SOW is attached, which describes (in the first task) the oil & gas issue above. Please let me know if you have any comments or concerns about proceeding with this contract.

\* The table titles for the EDMS pre-trigger reports are not entirely accurate. For instance, a source may be part of the pre-trigger tracking requirements even if it did not emit 100 tons in the previous year. Hence, the titles should be for "applicable sources", not those over 100 tons. Furthermore, Tom will verify that that EDMS will have a field to designate applicable sources and not rely strictly on a 100 ton criteria. Finally, it was noted that the regional emission estimate and comparison to the milestone should be made through the SIP-required and publicly-reviewed regional tracking report and not made available as a table from the EDMS, especially given the various adjustments that may have to be made to the annual inventories. Hence, Table 4 in the spreadsheet above should be replaced by a link to the report.

\* Not much was discussed regarding the status of SO<sub>2</sub> emission data collection and compilation other than the urgency to submit an entire air emissions inventory to EPA and the WRAP by June 1, after which focus on the WEB sources will likely sue. Hence, having a draft template from PQA to review by July 6 should work well with most schedules.