

WRAP Air Managers Committee Implementation Work Group

(12/3/03 draft)

Objective

The purpose of the WRAP Air Managers Committee Implementation Work Group (Work Group) is to help states and tribes prepare their regional haze implementation plans to meet the requirements of 40 CFR 51.308 and 401 CFR 51.309(g). The Work Group will be comprised of state and tribal representatives to accommodate the needs of states and tribes by recognizing the variety of regulatory and statutory authorities and range of technical and policy expertise. At the same time, the Work Group will strive to establish a common foundation that will allow states and tribes to coordinate their implementation planning on a regional basis.

Overview

For the last several years, the WRAP has been developing the technical and policy foundation to help states and tribes meet the requirements of the Regional Haze rule. These efforts to date have focused primarily on fulfilling the requirements of section 309 of the rule, since Grand Canyon Visibility Transport Commission states eligible to submit 309 plans must do so by December 31, 2003. Tribes are not subject to specific deadlines to submit TIPs. Many of the WRAP work products and lessons learned during the 309 process will be relevant to states and tribes during the 308 implementation plan development process, but considerable foundation work remains to be done prior to the assumed SIP submittal date at the end of 2007.

While each state and tribal plan will likely vary in the choice of strategies, together the SIPs and TIPs must demonstrate reasonable progress for each Class I area in the WRAP region (except the 10 Colorado Plateau Class I areas covered by the states that have proposed submitting 309 SIPs) and must also address any impact of emissions from the WRAP region on Class I areas in other states. One of the challenges of a successful regional effort is coordinating the technical and policy work of WRAP with the activities of individual states and tribes. Meeting this challenge is an objective of the WRAP strategic plan and is important for the following reasons:

- First, it is important that states and tribes coordinate their support of the WRAP work, (e.g., timely 2002 base year emission inventories).
- Additionally, the planning staffs of each state and tribe should get to know their peers from other jurisdictions and have a full understanding of the control measures their neighbors are considering and how the control measures in all jurisdictions across the region will be coordinated to demonstrate reasonable progress. It will also be important for states and tribes to share information about their regulatory and stakeholder activities related to regional haze implementation plan preparation.

- Finally, states and tribes must have essential work products from the WRAP in a timely manner in order to allow adequate time for enabling legislation and public processes to develop and adopt their individual implementation plans.

Through the Work Group, states and tribes within the WRAP region will begin collaborative discussions early on to identify what they need to do collectively to support the WRAP technical work through Phase I of the WRAP Strategic Plan, as well as to determine how to address policy, legislative and regulatory considerations during Phase II. Although control strategy elements have not yet been identified, it is useful for state and tribal staff to have a forum to share information and lay the essential groundwork for future control strategy decisions.

Organization

- Membership will be a broadly based and include Air Managers Committee designated representatives from each WRAP state, interested tribes and/or tribal representatives, EPA regional offices and federal land management agencies (NPS, USFS, FWS, BLM). Participation of non-governmental stakeholders will be considered by the Work Group on an issue-specific basis. The expectation is that representatives will be SIP/TIP planners, who will eventually be applying the WRAP work products to their individual SIPs and TIPS.

Goals

- The Work Group will provide input and feedback (from the implementation planner perspective) on elements of forum work plans, track and assess implementation of the WRAP strategic and annual work plans and commenting as needed on interim documents. This will include early identification of potential shortcomings of forum and committee work plans and products to help ensure that WRAP work products are prioritized, delivered in a timely schedule, and provide results that are appropriate to state and tribal needs. For example, the Work Group will be expected to address the following questions: Are the work products timely? Do they answer the right questions? This review should be viewed in the context of the SIP/TIP development needs and coordination as contrasted with IOC and TOC oversight of forum work products.
- The Work Group will build upon work already done by the WRAP to produce one or more SIP/TIP templates to help states and tribes prepare their SIPs and TIPS. To the extent applicable, the WESTAR 308 template will be used as a starting point for this part of the project. The format for the templates will likely include identification and interpretation of each of the Regional Haze rule requirements, so there is a common understanding among the workgroup, federal land managers, EPA and stakeholders of what is needed to fulfill the requirements of the federal rule.

Coordination and Processes

- The Work Group will meet periodically, either by conference call or face-to-face. It will keep the AMC informed, and will provide input to and periodically update the IOC, TOC, WRAP forums and other committees about the Work Group activities.
- The Work Group will maintain awareness of the status and possible effects on SIP/TIP development of federal legislative and regulatory actions, as well as results of any regional haze rule litigation. Specific examples include: Multi-pollutant legislation; RH BART and regional transport rulemakings; the challenge to the Annex rule; and, SIP submittal date harmonization.
- The Work Group will focus on what states and tribes should do to support WRAP technical work by facilitating state and tribal review of background information for the WRAP forums that will ultimately become a part of the state and tribal technical support documentation. The workgroup will also assist forums and committees when they need information by coordinating within their respective agencies to ensure that states and tribes provide timely responses to such information requests.
- The Work Group will communicate periodically with other RPOs to assess their implementation plan development efforts and may initiate or make recommendations to appropriate WRAP forums for mutually beneficial projects.

Timeline, Early Tasks

Recognizing that actual SIP/TIP control strategy development must be based on information not yet available, early work of the Work Group will include identifying what is needed to meet each regulatory requirement, assessing the timeliness and priorities of scheduled work products in the WRAP strategic plan and 2004 work plan and assuring that states and tribes are comfortable with baseline information to be used in later analyses. Special cases (e.g. CO early SIP requirement) will be taken into consideration. Also, in mid-2004, and in each year thereafter, the Work Group will provide input on the development of the annual WRAP Work Plan.

Deliverables

1) Review the 308 regulatory requirements and ensure states and tribes have a common understanding of 308 regulatory requirements. Prepare summary of requirements. Identify training needs and opportunities.

2) Review WRAP Strategic Plan and 2004 Work Plan. Identify key state and tribal deadlines (update WESTAR state rulemaking schedule table), compare them to those in WRAP Strategic Plan and 2004 Work Plan and to be developed project status report. Answer the following questions: How will the products developed by the WRAP (in particular: including ammonia, fire, dust emission inventory and related modeling meet

the needs of the states and tribes? What are the state and tribal priorities for WRAP products? (begin with Colorado comparison and timeline and 308 WESTAR table.)

3) Utilize existing communication avenues as needed to keep air managers up-to-date on WRAP activities and communicate SIP/TIP needs to the WRAP. Communicate back to WRAP the results of the work group review of the WRAP Strategic Plan and 2004 Work Plan (address needs, priorities and schedule).

4) Expand and refine 308 SIP/TIP template to create Model SIP/TIP and possibly Model rules.

Schedule

Activity	Date
1) Phase I Core Group conference calls to develop a work plan and agenda for activity 3	December, 2003-February, 2004
2) Identify Work Group membership	January, 2004
3) Two to 2 and 1/2 day face-to-face meeting of the Work Group (state/tribal regional haze SIP/TIP coordinator) (for 1, 2 and 3 (review) above). Objectives: Review WRAP milestones and products (including external communication support from the WRAP); Review of WRAP needs from states/tribes.	March, 2004
4) Communicate back to WRAP (3 above)	April, 2004
5) Work Group face-to-face meeting	Fall, 2004
6) Conference Work Group calls	Periodically, 2004
-Provide input on 2005 WRAP Work Plan	Summer 2004
-Model SIP/TIP	2005-07
-Possibly develop Model Rules	2005-07

Staff Support

Bob Lebens, Don Arzell from WESTAR
 Pat Cummins, Lee Alter, Tom Moore from WRAP
 Bob Gruenig, Tribal Caucus Coordinator from NTEC

2004 Budget Summary

Travel - 20 people for two for face-to-face meetings @ \$750/trip	\$30,000
12 Conference Calls @ \$250/call	3,000
2 Meetings. Facility costs @2000/meeting	4,000
Total	\$37,000