

**Meeting Summary
AMC Implementation Workgroup
Conference Call
April 29, 2004**

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Reference material:

DRAFT Road Map (as of 4/27/04)... (308)

DRAFT Road Map (as of 4/22/04)... (309(g))

DRAFT Road Map (as of 4/22/04)... (309R)

Untitled tables, flowchart, bargraphs from WRAP strategic plan.

Agenda Item 1 – Draft planning road map

Discussion (Corky Martinkovic):

Ref: §308 Road Map

The presentation includes only those requirements needing some activity by states/tribes/RPO, rearranged in process order. Some will be happening simultaneously.

Suggested changes to 308 road map:

- (d)(2)(i), Change, “12/04” in Target Date column to, “9/05”
- (d)(2)(iii), Delete, “2. State monitoring data,” from activity column
- (d)(4), Add, “3. Attribution of Haze workgroup; modeling, monitoring, emissions weight of evidence report,” in activity column

Consolidated Questions (on the road map and in discussion-See Appendix):

We should make the road map look more like a decisions tree or flow chart that can be easily used by planners as a reference and guide as to WHAT they need to do, by WHEN, and WHAT and WHEN the supporting technical and policy work from WRAP is needed.

Ray Mohr will assist Corky in presenting this as a flow chart.

Ref: §309(g) Road Map

Questions on each rule requirement – See consolidated list

Ref: §309R Road Map

Still in progress. The 309 Coordinating Committee has had several conference calls on implementation and tracking. Corky asked this work group to look for omissions and suggest revisions.

Agenda Item 2 – Coordination with WRAP forums

Don briefly described several coordination issues including fact that different planning specialists from each agency may be working on different forums, how to insure timely communication with other forums.

Several ideas to implement:

- Invite all planning specialists working on regional haze to participate in conference calls of this workgroup;
- Facilitate ability to track each forum on progress, simple spreadsheet format;
- Don, with help from Tom and Lee to flag issues, work plans, RFPs, interim work products by other forums, and facilitate review and feedback from this work group. First issues from fire and dust forums were reviewed at Santa Fe meeting. 2005 workplans will be coming up.

Agenda Item 3 – 308 states planning to include smoke management as a strategy

Corky will get clarification of this question from Pete Lahm and send e-mail to workgroup members.

Next steps – Questions to focus on May conference call agenda

- Format for SIP/TIP “template” Discussion about EPA need for some uniformity in SIPs/TIPs to help them do more consistent reviews.
- Developing a flow chart of the state planning process. Do a test run to ensure the process meets requirements. Caution about spending inordinate amount of time on this. Look first at flow chart and bar graph from WRAP strategic plan.
- Definitions of Reasonable Progress Goals-this workgroup or recommend AMC request that another forum develop this.
- Understand more about Attribution of Haze project. Discuss QA of data.

Next conference call is May 27 at 2:00 Mountain, 1:00 Pacific, 12:00 Alaska, 11:00 Hawaii

Appendix

Questions on DRAFT Road Maps

As of April 29, 2004

(Note: responses to some of these questions reflect discussion on 4/29/04. Other questions are unanswered and are left to be addressed. Additional questions will be added to this list.)

On 308:

308(e)(1)(ii)(B)-Improvement from BART

Does this involve individual analysis for each BART source? Can this requirement be satisfied without doing individual engineering analyses (from revised BART guidelines)?

Under proposed revisions of the BART rule, if state/tribe chooses an alternative strategy better than BART, analyses by source category can substitute for source-by-source analyses.

Is a source eligible for all pollutants under BART, if only one pollutant is emitted over the BART threshold?

Under proposed revisions to guidelines, once a BART emission threshold is exceeded for any covered pollutant, analysis (of visibility impacts, plus the other required considerations) must be performed for the other pollutants that are significant. Application of BART controls for the other pollutants may or may not be needed, based on the analysis. EPA is taking comment on whether to include NH₄, other pollutants.

Will improvement (in air quality?) be measured only for sources that install BART?

Can the road map table incorporate which forum is responsible for getting out individual reports and analysis?

We can indicate something. The WRAP workplan is about to be updated, and this would be a good opportunity to confirm project responsibilities

308(d)(4)-Emissions Inventory and Monitoring Strategy

Who QA/QCs data used in Attribution of Haze? Will WRAP technical forums develop database support for "fingerprints" for modeling? CMB?

The Attribution of Haze report will be "weight of evidence" using emissions, modeling and monitoring data to reach conclusions about which Class I areas are impacted by which areas. EDMS will accept emissions data, as is from states and tribes.

The Attribution of Haze workgroup project should be tracked by this workgroup.

308(d)(1)-Reasonable Progress Goals

Does EPA determine if Reasonable Progress Goal interpretations are acceptable? When does this occur? Will there be guidance on how will RPGs be defined-e.g., by deciview targets for each Class I area, or in terms of implemented regional strategies (and corresponding emission reductions)? Should we go forward with what seems reasonable for western Class I areas, and create de facto guidance?

This is a significant issue, and should be addressed, either by this workgroup or requested from another forum or IOC.

308(d)(1)(iv)-Consultation on Goals

Will WRAP Attribution Analysis assist (in consultation among states/tribes reasonably anticipated to cause visibility impairment)?

Consultation will be included in the Attribution of Haze project.

308(d)(3)-Long-term Strategies

When will EPA guidance be available for states with less than 3 years' data?

308(d)(3)(v)-Factors for Development of Long-term Strategies

What are differences among "On-going control programs, including RAVI measures," "Emission limitations and schedules..." and "Enforceable emission limits and control measures" (factors in the rule)?

Will each 308 state be doing a smoke management plan (i.e., is it a requirement or a strategy that must be considered-unclear about question)?

Corky will get clarity on question from Pete Lahm

How are regional and nearby source impacts accounted for and documented at each Class I area?

309(g)-other Class I areas to be addressed by 309 states and tribes

309(g)(2)-Demonstrate (baseline) visibility on 20% most and least impaired days

Will WRAP be providing updates for other Class I areas?

309(g)(3)-Set goal and control measures as required in 308

Will we proceed with NOx-PM Report and recommendations regardless of possibility IAQR in the west?

309(g)(4)(i)-Long-term strategies, using "credits" from 309 SIP

Who determines what credit is available from 309SIPs and when are determinations made? Will updates be done for 309? Should not miss this.

309(g)(4)(ii)-Demonstrate SO2 Annex is better than BART 308(e)(1) projection

Will WRAP be modeling to determine if milestone/backstop trading in Annex is better than BART for the other Class I areas?

This needs to be done carefully.

309(g)(4)(iii)-Determine compatibility of 309 strategies with 308 strategies

Is there time to do this?