

Conference Call Notes  
Air Managers Committee  
May 8, 2006

Cheryl Heying  
Jan Miller  
Terry O'Clair  
Tom Bachman  
Lee Gribovicz  
Tina Anderson  
Randy Ashley  
Colleen Cripps  
Bob Lebens  
Imad Shahin

Corky Martinkovic  
Lisa Tomczak  
Ira Domsy  
Chris Shaver  
Ray Mohr  
Pat Cummins  
Tom Moore  
Laurel Dygowski  
Don Arkell  
Curt Taipale

**Purpose of call:**

To brief state and tribal air managers on projects underway by the Stationary Sources Joint Forum on evaluating the 5-state SO<sub>2</sub> milestones, individual CALPUFF BART analyses, Oil and Gas emissions to assist in developing regional haze plans.

To elicit guidance from air managers on other assistance any state or tribe may want from the SSJF on BART engineering analyses, additional modeling of non-EGU or non-BART sources of SO<sub>2</sub> and NO<sub>x</sub> to include in reasonable progress demonstrations.

**Points of discussion:**

- Source categories that are generally considered potential BART candidates are EGUs, non-EGUs;
- Other source categories that are not BART-eligible could also be part of overall stationary control strategies;
- EGU sources have made the point numerous times that there are a number of EGUs that cannot meet EPA's presumptive BART emission limits for NO<sub>x</sub> with combustion controls alone;
- WRAP has indicated in the past (in principles for a "western CAIR") that aggressive NO<sub>x</sub> combustion controls on BART EGUs in the WRAP region probably represents BART;
- The BART engineering analyses to determine what controls meet BART are most appropriately applied by individual states to individual sources, based on individual situations, such as the statutory factors of cost, energy, useful life, time of compliance;
- States do not yet have the technical bases for making these determinations. They must come first from the affected sources themselves.
- The control technology determinations do not lend themselves to regional analyses and should be handled by states and tribes individually;

- That said, EGU's make up the bulk of SO<sub>2</sub> and NO<sub>x</sub> emissions from stationary sources. NO<sub>x</sub> control technology for EGU's is well understood, and there are similarities among western EGUs and the fuel they burn;
- Guidance on NO<sub>x</sub> emissions and control technology for EGUs has been produced by SSJF and is available for use by states and tribes as needed;
- There is a need for regional modeling to determine the collective impact of BART controls;
- States and tribes must make their BART emissions reductions known to the Regional Modeling Center in time for assessment of the effectiveness of BART in demonstrating reasonable progress;
- There is a need for the WRAP, through the SSJF and the AMC/IWG to facilitate interstate and tribal communication as the BART determinations are made.
- There don't appear to major non-EGUs or non-BART sources that should be included in any regional BART analyses **at this time**. This might change if particular sources or source categories are identified later;
- Oil and Gas development is projected to cause significant increases in NO<sub>x</sub> for the 2018 base-case. SSJF has a project to ensure the projected emissions inventories are reasonably accurate.

#### **Conclusions:**

- The Regional Modeling Center will proceed to assist states and tribes with their individual CALPUFF analyses, as requested for determining sources subject to BART; see: <http://pah.cert.ucr.edu/aqm/308/bart.shtml>;
- States and tribes will do their own individual BART engineering determinations of BART controls within their own jurisdictions;
- WRAP, through AMC/IWG will track progress of these state determinations; facilitate inter-state and tribal communication and coordination as needed. This effort will serve as a clearing-house for BART determinations, as they occur;
- The clearing-house will provide these determinations to the RMC for the regional air quality analyses;
- SSJF will proceed to evaluate the SO<sub>2</sub> milestones for the 5-state 309 SIP submittals, and will proceed to evaluate projected emissions from Oil and Gas development;
- SSJF will be prepared to revisit the results of the EGU NO<sub>x</sub> report if needed.