

Conference Call Notes
Implementation Work Group
September 16, 2004

In Attendance:

Karen Magliano
Pricilla Ligh
Jean Paul Huys
Jan Miller
Lee Alter
Dana Mount
Tom Bachman
Brian Finneran
Don Arkell
Rita Trujillo

Bob Lebens
Ray Mohr
Rosanne Sanchez
Brian Mitchell
Pat Cummins
Laurel Dygowski
Tina Suarez-Murias
Tom Webb
Melanie Lombardo

Comments on “Road Map” bar chart and table:

Corky explained that she developed the flowchart to identify each activity area, but that a separate document(s) would be needed to establish a timeline for these activity areas as well as the WRAP work products. The draft revised bar chart, “Schedule for Developing Regional Haze SIPs/TIPs in the WRAP Region...” and the table, “WRAP 2005 Workplan – Overview of WRAP Committees/Forums/Workgroups’ 2004 Closeout and 2005 Deliverables...” are useful ways to show the timeline, but require cross referencing.

Suggested revisions and refinements:

- Planners need “**writing schedules**” and timetables, with a list of **plan elements** to address each requirement of the Regional Haze Rule; a **Sequence of when** completion of each element must occur, in order to inform the various decision steps in each state/tribal planning process. Planners must be able to **explain to management** the meaning of each element and its significance in management decisions and policies.

A generic **table of contents** could be used to identify each plan element, maybe matched up with the flowchart. **It was generally recognized that any table of contents developed jointly would have to be quite flexible to accommodate the differences in state and tribal planning processes.** Moreover **SIPs and TIPs may be organized differently from one another, and the mix of control strategies may vary from state-to-tribe-to-state.** However most of the supporting information, such as emissions and monitoring data, and modeling results should be consistent across the WRAP region. An accompanying graphic, similar to the WRAP “Schedule for Developing...” bar chart might also be helpful.

*(Note: The timing and sequence of steps in state/tribal processes are **driven in part by the timing of the WRAP technical deliverables. This should be an area of periodic review and feedback.**)*

- In the Overview table, the times of the WRAP workplan deliverables should be by **completion month**, rather than the completion quarter. This could either appear parenthetically with each deliverable, or in another column on the table. Projects not yet initiated in 2004 and 2005 won't have months associated with them.

(Note: Timing of completion of future projects should be among the items in the ongoing IWG review of RFPs under development.)

- **Cross-references from the roadmap to the table and Gantt chart are needed. (added)**
- In the Overview table, the outputs from the Regional Modeling Center should appear in more detail, particularly those related to source apportionment of each states' impacts...associated with control strategy scenarios. It is unclear what and how scenarios would be chosen. (More discussion of this concern may be needed.)
- A Web-based communication and planning assistance tool, using the IWG web page would be helpful. The idea is to put the roadmap up on the webpage as an interactive resource, with direct links from each of the planning activity areas on the roadmap to the appropriate supporting material as it is posted. This effort would be accomplished through the WRAP Webmaster.

Discussion on BART and Stationary Sources Joint Forum:

In the opinion of at least some, if not all state and tribal air managers, any source-by-source BART work should be controlled and managed by individual states and tribes-not through the WRAP. The Stationary Sources Joint Forum is anticipating working on issues related to a market trading program as an alternative to case-by-case BART for SO₂ and NO_x, and may not go much further on case-by-case beyond identifying BART-eligible sources in each state and tribe and maybe estimating overall emission reductions of SO₂ and NO_x from application of BART. SSJF also expects to address some sector-specific stationary sources, such as oil and gas facilities that may not fit into a market-trading program.

In order for states and tribes to choose case-by-case vs. alternatives, comparative benefits analyses will be needed, but these cannot occur until EPA produces its modeling guidance in the Spring of 2005. So it will be difficult for a

number of states and tribes to choose which path is better until mid-2005 at the earliest. **Nonetheless, agencies opting for case-by-case BART should expect to handle BART control analyses on their own.**

A related issue includes how to define reasonable progress for stationary sources. There are others.

IWG should consider whether the anticipated deliverables from the SSJF sufficient to help make decisions on BART and Alternatives.

Attribution of Haze report review:

IWG will be able to review a draft of the Attribution of Haze report after mid-November, before it is distributed for a general comment period.

Face-to-Face Meeting:

Staff will work on scheduling a face-to-face IWG meeting the week of December 13, coordinated with the Stationary Sources Joint Forum. Items on the agenda will include a discussion with the Attribution of Haze contractor and if possible, a joint session with the SSJF.

Action Items:

Ray Mohr and Corky Martinkovic will be leads to refine the roadmap and associated tables and graphics, incorporating as practicable the suggestions made on this call, and to draft a list of wrap products linked to the activity elements on the roadmap.

(Note: We will attempt to get back on the regular monthly call schedule-that is the third Thursday of each month, at 2:00 Mountain, 1:00 Pacific, 12:00 Alaska, 11:00 Hawaiian)