

Meeting Notes
WRAP Air Managers Committee Implementation Work Group
San Francisco, CA
March 8-9, 2005

Purpose of Meeting

- Review of Attribution of Haze Report, with a tutorial and several case-studies
- Finalize Table of Content for SIP/TIP template
- Review selected WRAP workplans with forum co-chairs

Significant Issues-Phase I Attribution of Haze Report and case studies

- There are still large uncertainties in the modeled attribution inventory for a number of Class I areas. "Other" (unspecified) sources of SO₂ and NO_x vary from the hoped-for 20% to as high as 70-80%. Unaccounted-for offshore emissions from shipping could be a contributing factor, but these emissions are not included in the modeled emissions data set. Resolving these uncertainties should be part of the Phase II AofH effort.
- Further discussion and resolution is needed on protocols for gap-filling or explaining missing data, such as when equipment is clogged or other reason.
- What if any de minimus values should apply to source attributions? Should a lower threshold apply to all Class I areas uniformly, or case-by-case?
- Boundary conditions (Canadian, Mexican emissions) will need better definition. This should be a Phase II effort.
- Phase II will include projected attribution with several control strategies in place. The control strategies to be modeled will be selected by states and tribes.
- Ongoing training in use of AofH and weight of evidence techniques will probably be needed. Explaining to stakeholders the relative importance of conflicting attribution indicators will be a challenge.
- One job for planners is to discuss these tools with other staff and air managers. It is important to have agency management support for regional haze planning and to maintain this as a high priority objective among the other program areas.
- Refinements of data displays should be an ongoing effort for Phase II
- Resolution of attribution for individual sources would be helpful, but this level of resolution probably won't happen, at least for smaller point sources.
- AofH report is not only resource of information.
- PHASE II timing is an issue, especially for Colorado, which must have its SIP ready to go by third quarter, 2006.

Recommendations for Phase II Attribution of Haze report

Phase I should be considered a "dry run," including use of preliminary "2002-like" emissions data. Phase II is designed to:

- Refine Phase I techniques for use in Phase II;
- Analyze the differences between modeled results for 2002 and the projected 2018 base case, and between the 2018 base case and 2018 results projected with various control strategies;
- Reduce uncertainty in modeled data and attribution results, such as better accounting of emissions now in the "other" category, more complete emissions inventories from outside the WRAP area, including offshore shipping emissions;
- Make data and selected analysis tools directly available to states and tribes through a website.

Phase II is expected to focus on regional analyses of regional emissions reductions from selected control measures, and is not intended to identify specific additional local control measures. Individual states and tribes will likely undertake analysis of smaller geographic areas.

A proposed Phase II schedule includes completion of the base year 2002 emissions inventory by September 2005 and the 2018 projected base-case emissions inventory by December 2005. Control strategy analyses should be drafted by July 2006, and a draft Phase II report should be out for comment in August 2006. The final report should be finished by October 2006.

Template Table of Contents

The proposed Table of Contents was reviewed and several revisions were made by the workgroup. Volunteers were assigned various outline headings to begin writing the text of each section in SIP/TIP language. There was much discussion about defining “Reasonable Progress Goal,” “Glide Path,” and other terms contained in the rule. These will be clearly defined in the texts of the appropriate sections.

Several parts were added to the Table of Contents to address Class I and tribal areas that were located in more than one state. Also added were sections on controls for sources in outside jurisdictions that contribute to reasonable progress within a state or tribal territory, and the unique Utah situation of having only Colorado Plateau areas that are already addressed in the 309 SIP.

The revised Table of Contents is appended to this summary, including writers identified for each section.

An additional question from states and tribes was ascertaining protocol Approvability

Review of selected 2006 workplans from the WRAP forums

The co-chairs of each of the forums presented an overview of their respective proposed workplans. Suggested questions were provided for the work group related to usability of each proposed project in SIPs and TIPs.

- Emissions Forum-Mostly related to ongoing EDMS maintenance and enhancements, with two projects in Alaska to add to the emissions inventory, and an ongoing project to update mobile source emissions for '02, '08, '13, '18. In addition the Emissions Forum anticipates additional analyses for selected control strategies, and has budgeted funds for that.
- Stationary Sources Forum-Continuation of three projects: to assess oil and gas emissions, to identify current and potential NOx controls and emissions from existing electric generating units and to project base-case and BART emissions from stationary point and area sources. Emissions on tribal lands are included. There was discussion of the need for direction from states and tribes on general approaches to meeting requirements for stationary sources. There are large uncertainties due to little prospect of federal Clear Skies legislation, EPA rulemaking on BART and the recent court decision regarding the 309 Annex.
- Fire Forum-Finishing up a number of projects from past years, projects are divided into planning support and implementation support categories. Most of the planning projects include completing fire emissions inventories for 2002 and projected 2018, model sensitivity runs to determine impact of prescribed fire emission reductions on visibility and continuation of inter-RPO effort to standardize emission-estimating protocols.

Implementation support projects include inter jurisdictional coordination, fire tracking system development, emission and fire categorization guidance, and a smoke management workshop.

- Economic Analysis Forum-Just finished a test run involving several states and tribes on the Economic Analysis framework, using hypothetical voluntary and mandatory scenarios to assess how the framework might be used for economic comparisons of potential control measures. Additional projects include developing a baseline economic data base for the WRAP region, methods to estimate quantitative values for benefit/cost analyses of potential control measure scenarios, (related to another project of Air Managers Committee that focuses more on health related data.), development of a screening tool for preliminary economic analyses.
- Dust Forum-A dust control measures workshop is planned for later in 2005. Dust projects include re-evaluation of PM2.5/PM10 fraction, an enhanced ambient data analysis of Causes of Haze information, completion of a windblown dust emissions inventory, and developing a common definition of dust, to distinguish between natural and anthropogenic dust sources.

A few questions were posed to the various presenters. No objections were raised about appropriateness or timeliness of projects presented.

Next Steps

The next scheduled conference call is scheduled for March 17th at 2:00 MST.

308 Regional Haze SIP/TIP
3/11/05
Table of Contents

1) **[Background and Overview of Regional Haze Regulation](#)**

Alice Edwards Rosanne Sanchez

2) ***Plan Development Process***

Bob Lebens, Cathy Messerschmitt, Ken Cronin

- a) Regional Planning Process
- b) Federal Land Manager Consultation
- c) Tribal/State Coordination

3) ***Clean Air Act Section 110 Requirements (see CENRAP template)***

Rita Trujillo, Tina Anderson

4) ***Visibility Protection***

Ray Mohr, Alice Edwards

- a) RAVI; FLM letter(s), descriptions (51.302)
- b) Exemption from controls (list any) (51.303)
- c) Integral Vistas (if have-deal with as Class I area; if none say so) (51.304)
- e) Monitoring (any monitoring plans reference (IMPROVE)) 51.305
- f) Long Term Strategies (reference to Chapter 8) (51.306)
- g) Description of State/Federal NSR rule(s) (51.307)
- h) Reference to this SIP/TIP (51.308)
- i) Brief Description of 309 SIPs (51.309)

5) ***Visibility Conditions (1999-2004 IMPROVE data - available summer, 2005)***

Tina Suarez-Murias

- a) Natural Visibility
- b) Baseline Visibility
- c) 20% cleanest days – no degradation
- d) 20% worst visibility days
- e) Glide path determination (Mathematical calculation)

6) ***Sources/Source Regions of Regional Haze ([apportionment](#) - Attribution of Haze report)***

Ray Mohr

- a) In-state
- b) Out-of-state
- c) International
- d) 2002 Emissions and modeling projections for 2018 base-case

7) Long Term Strategies to achieve the Reasonable Progress Goal

Dana Mount to take a look

- a) Reasonable Progress Goal criteria ([see BART rule/guidelines](#))

Alice Edwards

- i) Cost of compliance
- ii) Time necessary for compliance
- iii) Energy and non-air quality environmental impacts of compliance
- iv) Remaining useful life of any potentially affected sources

- b) Overview and Analysis of all Alternative Regional Control Strategies

Kieth Rose

- c) Stationary Sources

- i) Existing source retirement and replacement schedules

- d) Mobile Sources

WESTAR Mobile Sources Committee, with format from Anthro Area. Trista Glazier to liaison with Mobile Sources Committee

- i) Federal strategies
- ii) State and local strategies

- e) Anthropogenic Area Sources

Corky Martinkovic, Rita Trujillo, Trista Glazier, Jean-Paul Huys, Priscilla Ligh

- i) Forestry
- ii) Agriculture
- iii) Construction
- iv) Other

- f) Other SIP enforceable strategies (e.g. energy efficiency or energy conservation programs)

Ray Mohr

- g) [Best Available Retrofit Technology](#)

Dana Mount

- i) List of BART eligible sources
 - ii) Impairment due to BART eligible sources
- iii) Retrofit control assessment
- iv) Degree of visibility improvement from application of BART
- v) Better than BART alternative (Trading – CEED litigation outcome, Spring, 2005?)

- h) Controls from other states that impact in-state class I areas.

Mike Edwards, Jan Miller

- i) Establish Reasonable Progress Goal

Rick Boddicker, Tina Anderson

8) Reasonable Progress Demonstration (demonstration against glidepath)

Alice Edwards

9) Impacts on Class I areas outside of state/tribal lands

Mike Edwards, Jan Miller

10) ***Future Commitments***
Jan Miller

Appendices

Definitions

Technical Support Documentation