

IWG Conference Call  
May 19, 2005

Ray Mohr  
Jan Miller  
Kieth Rose  
Alice Edwards  
Laurel Dygowski  
Brian Mitchell  
Tina Suarez-Murias  
Rick Boddicker  
Corky Martinkovic  
Bruce Polkowsky  
Don Arkell

Dana Mount  
Mat Carlile  
Curt Taipale  
Tom Bachman  
Tina Anderson  
Rosanne Sanchez  
Bob Lebens  
Priscilla Ligh  
Bob Gruenig  
Ken Cronin

*Response to several questions asked on the April IWG conference call*

Question: What happens if a tribe does not develop a TIP for a source on tribal land that impacts a Class I area in a non-tribal areas? Conversely, if a source on non-tribal land affects a tribal Class I area?

Response: The first choice is a SIP or TIP by the jurisdiction where the source is located. If not, then a FIP, upon a finding that controlling the offending source is appropriate. The key is the source is not off the hook if a state or tribe does not opt to address the source with SIP or a TIP. States and tribes are not precluded from writing SIP/TIP for Class I areas in other jurisdictions, but they probably cannot compel outside sources to meet haze requirements for Class I areas within their own jurisdictions.

Question: On "consultation," the Regional Haze rule is that states are required to consult with other states, but is silent about consultation with tribes. Can the template have this provision, especially if there is a market-trading program as part of the SIP/TIP? This is of concern mainly if tribes need emission set-asides to make a cap-and-trade program work.

Response: The template language can include this provision, recognizing the term "consultation" for tribes has a different meaning than when applied to states or land-managers. We want to continue to use the term, as it is in the language of the rule, but be clear about the different meanings.

Rmohr comment: We need to continue to talk about consultation between the states as well. Where more than one state contributes to impairment at a Class I area, all states contributing may need to declare that the "collective SIP control measures---not just the state where the Class I area is located are/are not sufficient to meet Reasonable Progress for the SIP period".

Understanding the distinctions of “Consultation” related to tribes should be part of the discussions developed for the AMC State/Tribal cooperation project (AMC-6.)

Question: If the strategies set out in a SIP or TIP lead to a reasonable progress projection, reaching “natural conditions” later than 2064, does this allow a state or tribe to use that as a basis for a slower rate of progress?

Response: Slower rates of progress may be submitted, provided there is also a justification of the slower rate using the statutory factors (cost, remaining life, etc.,) and the submitting jurisdiction makes public the number of years it would take to reach natural background under the slower rate of progress. There is no guidance as to how the statutory factors are used, but the general idea is to cause public pressure to reach the reasonable progress goal as expeditiously as is deemed reasonable.

Question: Related to the CAIR/RH interface, what are the implications of 110 (a)(2)(d) SIP call for ozone and other requirements on regional haze for those states with NAAs? Which states are subject to these?

Response: EPA will be coming out with guidance on handling these requirements.

#### *Comments from those who attended WRAP board meeting*

There was considerable discussion at the WRAP board meeting about the need for some guidance from states and tribes on critical policy matters related to stationary source programs, timelines for completion of WRAP technical work and possible additional staff assistance on this.

A couple of state directors are seeking a higher comfort level that scheduled work is underway, and some indication of time for completion.

*(NOTE: This is a role for IWG-that is to maintain ongoing awareness of the progress on technical and policy work of the WRAP, provide feedback to WRAP forums-and individually to help their respective state and tribal policy makers understand the results and implications for the individual agencies.)*

#### *Status of Draft Chapters*

##### *BART*

Status: EPA delay until June 15 with BART rule, Maybe with proposal on Alternatives. Alternative models to CALPUF may be included. WRAP is thinking of using CMAQ,+ as an alternative for doing BART analyses. Dana looking for comments.

##### *Visibility Protection, Haze and Emission Source Characterization*

Good progress here. Parts, if not much of the Colorado full-blown SIP may be useable for a template. One persistent question is whether the WRAP work will be useable in time to be of help to Colorado. It looks like it will, for the most part. Needs some air manager input about how to explain where emissions are coming from.

Visibility Improvement

Still working on visibility improvement. California will be looking at what are the drivers (of visibility impairment) on the 20% worst days. Probably will wind up with groupings. Need individual Class I area impact analysis, to understand what needs to be done.

Need to be sure to account for projected effects of existing control strategies.

What are tribes doing now to protect visibility? E.g. open burning, dust, etc. Talk to Rosanne and Ken about this. Bob G. will follow up with Ken

Interstate Impairment

Jan wants to re-do hers and Mike's part 7(h) and part 9

Reasonable Progress Goals

Rick and Tina A will continue to work on this. Suggested removing 7(i) from outline, and incorporate as part of 7(a).

Projection

Keith Hold for later

State/Tribe/EPA Protocol

*Bob L. will continue to work on consistent formatting*

Next Meeting

June 16<sup>th</sup>, at 2:00 MDT, 1:00 PDT, 12:00 ADT, 10:00 HST

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