

Meeting Notes
Implementation Work Group
August 29, 2005
Portland, OR

Purpose of Meeting:

- Finish updates on draft Regional Haze SIP/TIP templates
- Presentation on Attribution of Haze Report/Technical Support System development
- Feedback on draft EPA SIP Review Protocol

Significant Discussion Points:

- *Review of the status of each state planning process-*
 - States represented at the meeting are mostly in the initial stages of plan development and are evaluating the technical information currently at hand and soon to arrive.
 - Mixed bag on which state will continue with case-by-case BART, and which will eventually opt for an alternative trading program. Most states are assuming case-by-case BART will be needed under any scenario, and are proceeding down that path.
 - States are still not clear about what an alternative trading program would look like, and would like to see what a comparison of case-by-case, vs. alternative would look like.
 - Colorado is proceeding on an accelerated timetable, due to need for legislative review of the SIP in early 2007.
 - Tribes not moving forward on TIPs, but will be identifying issues in SIPs that involve tribes, and engage with states to make sure tribal interests are addressed. Use SIPs as examples
- *Review of each chapter of template*
 - Comments included organization, readability, parts that should be included in the SIP document, and in appendices
 - Concern about form of technical support documents
 - Control strategy analyses will be filled in as WRAP technical work is completed
- *Attribution of Haze, Phase II, and Technical Support System projects-*
 - AofH II will show projected 2018 emission and modeled visibility data for base conditions and with control strategies in place. This will be the basis for determining reasonable progress
 - TSS will display the data on web pages. Some of the pages will allow interaction, and updating for use in future planning
 - Concern about how to use the TSS as technical support for the 2007 SIP's/TIP's, and what EPA would need to complete plan reviews
 - Hard copies or discs of the TSD will be necessary. These can be created by each state from downloads of appropriate documents from TSS.

- *Training needs-*
 - Training is needed for AofH and how to apply weight of evidence. WRAP will work on putting together 2 one-day short courses on these two subjects in the near future
- *Consultation Process – state-to-state, state-to-tribe, state-to-FLM-*
 - Not quite ready to articulate-Probably a matter for AMC to set some policies
 - TDDS will have a short list of major sources on tribal lands
 - Tribes are looking at issues within state SIPs for issues affecting tribes. These issues need to be identified early on in state SIP development process)
 - Preliminary decision to treat area sources by source categories that affect each Class I area and not state-by-state, or with general regional application of control measures
 - Need AMC input to determine de minimus levels for out-of-jurisdiction visibility impacts requiring full impact analyses
- *Review of draft EPA protocol*
 - A number of suggestions on revised 309 protocol. EPA review team will work on these.

Action Items:

- *Continue finalizing draft templates*
- *Organize 2 one-day training sessions on Attribution of Haze and Weight of Evidence*
- *Respond to requests for input on WRAP work products*