

## APPENDIX

### Responses to roundtable questions on BART and RH planning, consultation IWG meeting Dec 6, 2006

#### 1. *What is the status of BART in your state?*

##### *a. When do you expect engineering analyses for BART controls (and associated emission reductions) to be completed?*

###### **AK**

Sources modeled into “subject-to-BART”, there are 7 facilities of various categories in the mix. Due to time needed for the rule, (see below) analysis won’t be done until Fall

###### **AZ**

Final Base-case emissions data for BART was given to WRAP for Subject-to-BART Modeling on November 28. This is based on presumptive BART emission limits. AZ has had a RA-BART rule on the books for awhile. No deadline in current rule to complete engineering analysis. Rule allows opportunity to appeal. AZ is scheduling this for May '07. Feels sources have awareness that this is coming, and they shouldn’t throw unnecessary roadblocks in the way.

###### **HI**

Just getting started. Eight BART-eligible sources. Sources are modeling. State only want sources to model one time. How to do?? Question on how to do \$/dV.

###### **ID**

Four sources going into BART determination, three will be modeled. One source is putting on controls that the state is determining to be BART and won’t require BART analysis.

###### **CO**

Engineering analyses are almost finished (August 1) and under review. A BART alternative is proposed for EXCEL to accommodate an earlier voluntary emission reduction agreement “Bubble approach”. About 5 months to do engineering analysis

###### **OR**

Modeling is done for 8 out of 10 BART-eligible sources, seven of which are above the 0.5 dV threshold. In January, state will present modeling data to Subject-to-BART sources, and will give them 2-3 weeks to digest. Boardman has already gone through control analysis with state and they hope that this process will be used as a template for the others. Need to get permitting staff on board, and to work jointly with sources. They expect to complete engineering analysis in March or April.

###### **UT**

4 units subject to BART-Already started on designing and installing controls. These are PacifiCorp facilities. Other facilities are or will be at or below presumptive BART limits. All of this is done under NSR.

**NM**

One source is subject to BART. Source is telling state it will take at least 5-6 months to get engineering analysis. Four-corners, on Navajo land (EPA region doing FIP) is biggest BART source in New Mexico.

**BN**

Albuquerque has one source subject to BART-Will work with NM on this and other RH issues

**WY**

Six units subject-to-BART. Analysis will probably be done around first of 2007.

**CA**

BART sources in San Joaquin and South Coast will be subject to RACT-SIP analysis because of NAAQS. California RACT in these federal non-attainment areas is already more stringent than federal BART. There is no state BART rule because local districts have stationary source control responsibility. Some BART-eligible sources in Bay Area, Eureka Bay (North Coast), and Mojave Desert will go through subject-to-BART modeling, if they are not already covered by district retrofit rules. Other BART-eligible sources along coast already have BART-level controls.

**SD**

All BART-eligible sources modeled less than 0.5 dV impact.

**ND**

Received initial BART determinations from the seven BART sources and forwarded them to adjoining states, EPA, and the FLMS. Comment from EPA R8, NPS, and F & WS, as well as MN Pollution Control Agency, plus ND requests for more information were sent to the BART sources the first week of December. Responses from sources requested by the end of December.

**NV**

Nevada has received the subject-to-BART modeling results from the RMC and we are currently reviewing the information and preparing to share it with our sources later this month.

***EPA(Navajo, Four Corners)***

EPA has requested BART analyses by August 2007

*1. What is the status of BART in your state?*

*b. When will final BART controls (and associated emission reductions) be approved by the state? SEE TABLE BELOW*

**AK**

Starting on a BART rule, will plagiarize from other states. Need legal determination on how this will work - permit or SIP-based

**AZ**

Presently scheduled for September '07 about 3-4 months to do this step, maybe longer depending on when permitting engineers can get to it. Agency is responding to other priorities.

**ID**

March or April, with final determination based on company analysis. State is conducting independent estimate of BART and has asked for a best guess from the source for modeling, feeling confident that the sources already know what BART is.

**CO**

Rule requires preliminary finding in January, final action in May. This process is on schedule. CO needs to know what other states are doing for BART and long-term strategies as information for the CO air quality commission.

**OR**

Final BART determination is estimated to be complete in March or April

**UT**

Emission data for controlled BART limits are already submitted to WRAP

**NM**

Unknown, their source said it will need 5-6 months to do analysis, and then NM will need time to review.

**WY**

Spring, 2007

**CA**

BART-level controls on most BART sources are currently on-the-books and would be part of the base-case modeling analyses. CA will go through the BART process for those few sources that may not have retrofits, but is not expecting any reductions to matter very much for modeling purposes. There will be few further emission reductions and they will not show up on a 12km grid model. Subject-to-BART modeling finished by April, or sooner if generic worst case is used for Bay Area, North Coast, and Mojave Desert.

**SD**

N/A

**NV**

Our sources have not seen the modeling results yet and therefore have not had an opportunity to review and comment on them. We are hoping this process starts as soon as practicable after our meeting with the BART sources.

**ND**

Expect final draft BART determinations completed by the end of January. Final approved BART SIP could be done and submitted to EPA in May.

**EPA (Navajo, Four Corners)**

EPA expects to have determinations of BART by December 2007

*2. If applicable, what is the status of any state rules that may need to be adopted to implement the federal regional haze rule?*

**AK**

Will be scheduling rulemaking

**AZ**

Rules are on the books. No additional rules at this point.

**ID**

Rule will go for legislative review to acquire statutory authority in January.

**CO**

Rule was adopted in March 2006

**OR**

Thinking BART rule is not needed. Need to do further research on this.

**UT**

Establishing BACT/RACT control measures under NSR, and don't believe additional BART rules are needed.

**NM**

Probably won't need rule for BART and RH, May need rule for Oil & Gas, or other source categories.

**WY**

Will combine any needed SIP rulemakings with recently adopted BART rule.

**CA**

Local districts have comparable rules already in place, many prior to 2004. Basically, what is in place now will be what is in the RH SIP. Any rules for PM2.5 and 8-hour ozone will not be adopted until post 2007 and therefore will not be in the RH SIP. However, many of those rules must be adopted and implemented by 2015 so there will be some unknown (unquantified) benefit expected by the time of the mid-course review. The rules may not apply to "BART" sources per se, but rather to area or mobile sources.

**SD**

No rules needed, as no BART-eligible sources are subject to BART.

**NV**

Nevada can only adopt temporary rules during preparation for our legislative session (July-January) and the legislative session itself (February-June 2007). In the event that Nevada needs state specific regulations for the 308/BART requirements, they will be developed during the first part of the year and presented for adoption after the session.

**ND**

New regional haze rule, NDAC 33-15-25, will be effective January 1, 2007.

**3. How are stakeholder relations proceeding? What are the major issues?**

**AK**

Planning to combine stakeholder process with rulemaking. Meeting regularly with FLMs.

**AZ**

Jan 22 for initial stakeholder meetings, including FLMs to review particular park issues.

**ID**

Stakeholder process is underway, will re-start this in January.

**CO**

Maintained stakeholder process, incorporating Regional Haze issues into Rocky Mountain Regional Partnership, and Oil & Gas discussions with FLMs, other stakeholders.

**OR**

Starting to get lined up, including FLMs-These will be sit-down meetings to identify issues. Will start this month. Need to schedule meetings with tribes, generic stakeholder meetings.

**UT**

No further stakeholder process, this was done during the 309 process

**NM**

Maybe-burned out on stakeholder process during the 309 process,

**WY**

Keeping stakeholders up-to-date through public hearing process.

**CA**

Met with Federal agencies; proposing an ARB/federal agency steering committee, which will convene by conference call to review specific issues for CA Class I areas. Park Service and Forest Service are the only two with C1As in CA.

**NV**

We are meeting later this month with our BART sources, and plan to have a full stakeholder meeting after that.

**ND**

Regular monthly conference calls with EPA and BART sources and quarterly meetings with the lignite industry. They are going well. Outreach to other stakeholders will start in 2007 when the BART SIP is drafted.

The major issue for BART is what is BART for NOx for three lignite fired cyclone boilers. EPA position is SCR per the BART Guidelines; sources position is SNCR due to the unique composition of lignite. The issue is yet to be resolved.

*4. How are your consultation processes with other states proceeding?*

**AZ**

Need to know what other states are doing.

**ID**

Interstate BART modeling protocol agreements with OR, WA

**CO**

Colorado has to show what other states are doing-Need input on BART and other RP strategies from other states - thinking about a backup plan

**OR**

They have consulted with Idaho on BART. With WA's announcement of possibly reverting back to DOE, they think this could cause some possible delays, and would be an issue. Planning to also consult with Region 10.

**NM**

Need to consult with Texas and Region regarding 4 corners.

**WY**

Will use public hearing process during any additional rulemaking as consultation

**CA**

Cross-border smoke issues with Oregon handled through Northeast Alliance (air districts, land management agencies, and private burners.) AZ also has been consulted. Consultations with WA(EPA) and NV are still needed.

**NV**

Beyond the conversations that have occurred during the WRAP process, we have not started individual consultations with other states.

**ND**

Monthly conference calls with EPA Region 8 (Montana), and the States of Minnesota and Michigan and others concerning the Northern Class I areas (Voyagers, Boundary Waters, Isle Royal and Senne). Communications with the FLMs, South Dakota and Wyoming are as needed. Those planning processes seem to be proceeding well and ND doesn't foresee major issues.

*5. What other major air quality issues are confronting the state that may be relevant to regional haze?*

**AK**

At least one new PM2.5 NAA, and ongoing PM10 in populated area.

North Slope refineries to refit for low-sulfur oil productions.

WEST-COAST STATES HAVE OFF SHORE SO4

**AZ**

Two other SIPs, including PM, including 5% across the board reduction (Phoenix) and 8-hour Ozone

**HI**

Need for rule is there. Need to schedule

**ID**

May have a brand-new PM2.5 NAA in Cache Valley (SW ID-NE UT)

**CO**

Other impacts in Class I areas, such as deposition, other air quality impacts; Growth in Oil & Gas development, oil shale, etc

**OR**

A more restrictive PM2.5 and two exceedences from Rx burning may create non-attainment area in Eastern OR??? Have already instituted additional criteria, including ESMP measures

**UT**

PM2.5 NAAQS will be exceeded in about 10 counties.. 8-hour ozone may be exceeded if ozone NAAQS is tightened next year as expected. Oil & Gas development on tribal land (outside UT's jurisdiction) can be an issue. Regional Ozone is also a significant issue. Utah is entirely a 309 state and is not looking to do extra for RH, but will catch sources under PM2.5 expected NAAQS NA designations. Direction from state environmental commission is "don't wait for litigation over NAAQS to start dealing with PM2.5 "

**NM**

Oil & Gas growth

**WY**

Oil & Gas development and Ozone NAAQS

**CA**

GHG, NAAQS, Sprawl in urban areas(local issue), goods movement, diesel risk reduction, PM2.5 and 8-hour ozone NAAQS rules should produce additional reductions after RH SIP submission through 2015 and beyond.

**NV**

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**ND**

The work to prepare the RH SIP is enormous. The issue of how to address International emissions and the potential that controlling all reasonable sources may not reduce impairment enough to meet the uniform rate of progress.

**6. What progress have you made in digesting or incorporating WRAP data/products (emissions, attribution, etc.)?**

**AK**

Struggling to find a way to demonstrate RP without modeling. Will be working with Region X

**HI**

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**ID**

TSS is good, and is being used

**CO**

Getting clear understanding of what is available and how to use it is ongoing.

**OR**

More later (during presentation on SIP template)

**CA**

Working with data to explain key non-smoke contributions; interested in PMF

**UT**

Others working on this

**NM**

Dust project forced use of TSS, and is up on use.

**WY**

Others working on this.

**SD**

Others working on this

**NV**

Work in progress!

**ND**

Have data for existing conditions and the uniform rate of progress using the old and new IMPROVE equations from Views. We are just starting to use the TSS to analyze the North Dakota Class I area IMPROVE data by species.

Responses to Question 1b. version Jan 3, 2007

STATE/Month in 2007	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	beyond
AK													
	More S-t-B sources than expected. Will start on rulemaking												
AZ													
	Review schedule dependent on FTE availability												
CA													
	On-the-books controls on most BART sources already for NAAQS. Further reductions for RH not likely												
CO													
	State BART rule requires completion of BART determinations by March. On schedule												
HI													
	Unknown-Will have B-E sources model, but only once. Will need to schedule rulemaking												
ID													
	One source installing BART. Internal estimates of control technology for remaining sources												
MT													
	EPA responsible-BART schedule estimate from EPA on 1/3/07												
ND													
	Expect to have BART SIP completed for submittal in May												
NM/BN													
	Source says 5-6 Months to get engineering analysis												
NV													
	Unknown-Dec meeting with B-E sources. May be more StB than expected. BART schedule developed later												
OR													
	StB modeling results in January. Expect fast-track review. Boardman used as template												
SD													
	All BART-eligible sources modeled out of BART-No additional BART analysis expected												
UT													
	BART sources starting control implementation-BART emissions projections submitted												
WA													
	Unknown at this time-WA resumed RH planning and is now responsible for planning schedule												
WY													
	May need additional rulemaking for reasonable progress SIP, will combine with BART rule												
NAV/FC													9
	Four Corners due with BART estimate in August. EPA proposal in December												