

Implementation Work Group
Meeting Summary
April 17-19, 2007
Catamaran Hotel
San Diego, California

Objective: In support of western Regional Haze SIP development, states will discuss the status of the 2018 Reasonable Progress modeling run, share information about reasonable progress determination efforts, and discuss the process for evaluating control strategies.

(Please note referenced Action Items, Consensus Determinations, Review and Comment Deadlines that are Appendix 1 of this summary.)

Agenda Items:

Status and Discussion of 2018 Preliminary Reasonable Progress Modeling Run

Presentation: "WRAP 2018 Preliminary Reasonable Progress (PRP) Emission Inventory and Modeling Analysis" [PDF](#) or [PPT slides 1-11](#)

Overview of Process and Schedule, Update and Discussion of ERG Emissions Inventory update Project

Issues and main discussion points:

- **States should review draft report and ERG responses to preliminary comments**
- ERG will post, send e-mails out to states - End of April deadline for return comments from states (**See Item #2, Appendix 1**)
- ERG send redraft out mid-May
- **These emissions data will be used for the modeling run Results presented in June workshop**

Update and Discussion of Phase II Oil and Gas Inventory Work and Control Strategy Evaluations

Presentation: "WRAP 2018 Preliminary Reasonable Progress (PRP) Emission Inventory and Modeling Analysis" [PDF](#) or [PPT slides 12-20](#)

Issues and main discussion points:

- Data are being collected from producers and state O&G Commissions
- Environ is making basin-specific emissions estimates
- Focus is on well-head engines and compressors
- Also looking at potential control technologies and developing white papers on practical control options.
- Draft report due out in mid-May

Recap on SO2 Reductions Across the WRAP – Pat Cummins

Status of BART Determinations across the WRAP

Presentation: "Status of BART Analyses" [PDF](#) or [PPT](#)

Chart: "Western State Power Plant Emissions (1995-2006)" [XLS](#)

Chart: "Excel bar chart and table on coal capacity at western coal power plants in MW" [XLS](#)

Issues and main discussion points:

- Large SO₂ decreases projected for 2018 from BART and On-the Books reductions
- New coal power plants over the next 10 years are likely to be few
- There is increasing interest among power producers in natural gas as fuel for electric power generation
- Additional incremental decrease of SO₂ and NO_x emissions from non-BART EGUs will be small

Use of placeholder values for SO_x and NO_x?

Issues and main discussion points:

- Most BART determinations will not be available in time for this modeling run
- Values chosen for SO₂ and NO_x emissions would be for this modeling run only
- States don't want presumptive BART values for this modeling to prejudice final state BART determinations, especially for NO_x - fewer problems for SO₂
- **Consensus that for BART assumptions for this modeling run, SO₂ emissions will be assumed at 0.15 lb/mmBTU, the presumptive BART, unless the state provides a better number. For BART NO_x emissions, use only state-provided BART numbers. (See Item #2, Appendix 1)**

Review of emission reductions associated with smoke management programs

Presentation: "Fire Emissions Inventories for Regional Haze Planning" [PDF](#) or [PPT](#)

Issues and main discussion points:

- Prescribed fire emissions are currently less than 10% of all non-agricultural fire emissions
- Under any of three 2018 scenarios, wildland fire use, ("let it burn") will increase substantially
- Ag burning is held constant for 2002 base year and 2018 base-case (planning) year
- Applications of ERTs should reduce, or "avert" some of the projected emissions from controlled burning, including Ag

- Tables show estimated reductions from application of known ERTs in four vegetation types, range, grass, forest, crop
- States may use these tables in demonstration of reasonable progress within this source sector

Local Measures, If Any, States Are Evaluating

Issues and main discussion points:

- States should take credit for emission reduction measures to meet other air program requirements, (e.g. NSR/PSD, NAAQS, Smoke management, NAAQS, etc.)
- States have not determined additional local measures to evaluate for regional haze

EPA Updates and Issues

EPA Updates and Issues [PDF](#) or [PPT](#)

Issues and main discussion points:

- RPGs must consider both the four factors and URP
- RPG strategies are not limited to those needed for URP or by predetermined list of non-BART sources
- Long discussion on ID of non-BART sources to be considered in setting RPGs and the Long-Term-Strategy
- Discussion of draft WRAP-developed spreadsheet of stationary sources >250tpy/500tpy SO₂ and NO_x. See: [XLS](#)
- **States should review and correct information on this spreadsheet by May 4. Include control method and efficiency for each unit. Send corrections to Lee Gribovicz (See #3 in Appendix 1).**
- Species-specific analysis would be acceptable to identify and prioritize sources to (consider for) control,
- URP is driven by analysis of source controls, not by species-specific URP, list of favorite large facilities
- Suggest consideration of non-BART sources meeting a Q/D >10 test, where Q=tpy for all species, D=distance in Km
- States need to ensure consultation with other states where there are impacts
- EPA would like to assist where states will be late in submitting SIPs
- EPA would like a “heads up” where states will be late in submitting SIPs
- **States should keep their respective regions informed on their schedules if they expect late submittals (See Item #5 in Appendix 1)**

April 18

Review of States' Reasonable Progress Demonstrations

Presentations from:

- Wyoming [PDF](#) or [PPT](#)
- Montana (EPA Region 8) [PDF](#) or [PPT](#)
- Idaho [PDF](#) or [PPT](#), [ZIP](#)
- Oregon
- California [PDF](#) or [PPT](#)
- Arizona [PDF](#) or [PPT](#)
- Colorado [PDF](#) or [PPT](#)
- Utah
- Nevada

Issues and main discussion points:

- **Conceptual agreement on Reasonable Progress Protocol**
- **Methodology for identifying non-BART sources start with major Q/D list Lee Gribovicz is developing**
- **Consensus on identifying the important non-BART sources for future evaluation if state cannot get rule in place by submittal. The SIP should identify the sources, and include binding commitments to evaluate them.**
- **Encourage wide net of potential sources to look at in the future, to keep options open for possible control measures**
- **Language of these SIP commitments is important-may need additional discussion**
- **Required elements of the Regional Haze Rule must still be met-consultation, application of statutory factors, ID and consideration of non-BART sources**
- **Progress on identifying these sources will be assessed in August and discussed at the next IWG meeting (See Item # 7 in Appendix 1)**

April 19

A Process for Evaluating Control Strategies to Demonstrate RP

Draft Protocol [DOC](#)

Issues and main discussion points:

- **States need to review the draft non-BART source list, control types and emission reduction efficiencies. (See Item #2 in Appendix 1)**
- Re-work protocol draft per discussions on 18th,
 - Address the “non-BART” source identification (See Item #1 in Appendix 1)
 - Remove “non-BART source ID” in step 10 as a repeat step for analyses of least-impaired days
 - Simplify the flowchart – consolidate into fewer steps

- Ensure description in the SIP of the process for addressing and evaluating these sources and source sectors
- WRAP will develop a **simple tool to address relation of emissions to types of controls**-Important for this to have **State information on control devices and efficiencies**, (See first item above)
- **This will be a tool for going to permits people**
- For LTS, discussion of contents
 - States with any authority to re-open permit for RH?

SIP Progress: State Timelines and Commitments

Issues and main discussion points:

- Colorado presented three methods of consulting with other states on inter-state impacts-from both incoming and outgoing emissions

Document: "Decision Points for Regional Haze SIP Consultation Process" [PDF](#) or [DOC](#)

Document: "Analysis of Colorado visibility impacts on nearby Class I Areas" [PDF](#) or [DOC](#)

Presentation: "Contribution Matrix" [PDF](#) or [PPT](#)

- Consensus that these methods could be applied elsewhere, and states were receptive to using similar methods (See Item #4 in Appendix 1)

Summary of Progress Made on SIP Efforts and Next Steps

ID-April at soonest for BART

HI-Information halted. Met data is faulty. Preparing BART and general authority

WA-Received funding for BART from BART sources. Funding for RH planning expected from legislature. Late submittal, but no time schedule as yet.

CO-BART rule adopted. BART reductions are submitted about 16k tons for SO₂, 3k tons for NO_x. Still shooting for December 17th submittal date from Commission. Still needs to go to legislature. 60-day formal FLM notice for review is on the horizon. Other state contributions are important issues. May have to do update later. Public notice for Commission meeting in August, but might slip a month or two.

NOTE: FLMs are reviewing BART information now, as it comes in. This should not be considered part of the required 60-day consultation. FLM reviewers need time to coordinate with HQ.

NV-Some staffing changes, but management still going for Dec. submittal. One BART source still in limbo. Another BART analysis expected this week.

WY-6 BART applications are in, staff reviewing them. Get this done by summer. Need BtB for milestone analysis. Issues with keeping enough NSR staff around to do the BART determinations. Will be doing 309 revisions on parallel track. Public outreach in June, another in fall. SIPs probably going to be submitted in 2008.

SD-Additional modeling on lone BART facility. SIP probably in spring, could be later. Discussed with NE, MN,

NOTE: CENRAP state consultation-Several western CENRAP are source-only states and need information from eastern WRAP states about possible contributions.

OR-Less optimistic OR will meet deadline. 7 BART sources, Boardman on accelerated schedule, other sources unknown, but are working. EPA-10 meeting in January. Some FLM coordination, and OR is aware of 60-day notice. Need more tribal interaction, and will be doing some outreach. Enviro are anxious about BART modeling, and will need some additional outreach. Bruce is offering FLM perspective for public meetings, sometimes to counteract industry. Offer. OR submittal would now be estimated for Spring 2008

UT-Draft SIP in June, adoption in October, submittal in December. Done with BART, still need to do LTP. UT is basing its schedule on 309 milestone work being done in next two months. Utah is aware of consultation requirement.

CA- Current schedule is Sept 17, board hearing in November. Draft SIP in June. FLM 60-day notice will be issued. Public workshop end of June. BART modeling is underway to see impacts from CA in AZ. Other BART sources in the SF Bay area. BACT/MACT limits are equivalent or better than BART. Title V permit renewals will include look at BART. Some thinking that BART might trigger rebuild with new technology, and be BACT/LAER.

AZ- Working on revisions to the AZ 309 SIP along with revisions to the Model Rule and Model SIP for federal RH Rule changes – save the milestones and allocations portion that has been tasked to Utah and SSJF. Arizona has one park that is adjacent to an area under the 5 percent rule for PM10 where issues may be in flux close to shared December deadlines. BART sources in Arizona are aware of issues, so no real surprises; however, no hammer to get them to not request extensions. Also, still workload issues for AZ staff once BART sources' responses are returned.

ND- BART rule done. BART schedule is probably not going to be on-time. Additional SIP later. Array of issues with individual sources, including discussions on stringency of controls, (SCR on cyclone-fired boiler) etc. ND is in contact with neighboring states. Back-and-forth with states. EGU BART determinations are going slowly. NOx is the biggest issue. PM and SO2 are lesser issues. Calpuf modeling for NOx, to be integrated with CMAQ for other pollutants. Cleared all this with EPA modelers, etc. Canadian emissions from EGUs are also a big deal.

AK-Own schedule. BART still going slowly. Late in 2008. BART rule out for public hearing, in Feb-March. BART out by end of year, maybe. More or less one year late.

Albuquerque-on target. Hearings in fall. Submit in fall.

No TIPs in the works.

EPA-acting for Navajo-Late in game to develop controls by September.

Miscellaneous:

- States that believe they will be late in submittal should contact their respective EPA regions for “heads up,” and how to address any related issues (See Item # 5 in Appendix 1)
- Question of addressing future revisions of the Regional Haze SIPs. States should think about this (See Item # 6 in Appendix 1)
- States should not forget about the requirement for a monitoring strategy. Tom Moore will draft something that states can use (See Item # 7 in Appendix)

Next meeting in August

APPENDIX 1

Near-term IWG Action Items and Consensus decisions from 4/14-19/07 meeting

1. Finish reviewing the RPG Demonstration Protocol. This document was originally drawn up by Lee Alter, commented on by many, revised by Don Arkell and Tom Moore to address the comments, and re-hashed at the IWG meeting. Don Arkell is now making one more set of revisions to respond to comments from the meeting. Don will be sending the document out via email for final review. **IWG will attempt to officially accept the protocol on the next IWG call.**
2. In preparation for the 2018 Preliminary Reasonable Progress Model Run in May, IWG members and their working associates should get all **final comments and corrections on the 2018 PT and Area EI back to Lee Gribovicz and Tom Moore by April 27, 2007**. Any recent and new BART determinations should also be sent to Lee. With respect to BART eligible EGU emission levels in the 2018 PRP run, **IWG agreed with the plan to use all recent BART determinations where available, presumptive levels for SOx when not available and no substitutions for NOx over the 2018 base case.**
3. Review the list of potential non-BART 250 and 500 ton SOx and NOx sources for your state which Lee Gribovicz has compiled and loaded up on the WRAP website. **See Spreadsheet: "Non-Bart Sources Near CIA's" [XLS](#). The first review should focus on making any necessary corrections, such as sources in the wrong state, wrong pollutant totals, incorrect distances to class 1 areas. The list should not contain BART sources. Please try to get corrections to Lee by May 4th, 2007.** Then State reps will need to identify the control efficiency and control methods for each unit in their state. As to how states will deal with this list is yet to be determined and the topic for future IWG discussions.
4. Each state needs to look more systematically at potential impacts on other state Class 1 areas. Curt and Ray presented a fairly easy method of scanning PSAT results for Class 1 areas that are logical candidates (surrounding states, downwind states etc.). **See Document: "Analysis of Colorado visibility impacts on nearby Class I Areas" [PDF](#) or [DOC](#)** Then states need to initiate discussions with those states where impacts could be an issue. **See Document: "Decision Points for Regional Haze SIP Consultation Process" [PDF](#) or [DOC](#).** Many states have already done this. Ray also provided a matrix that states can use in these discussions. **See Presentation: "Contribution Matrix" [PDF](#) or [PPT](#).** States on the CENRAP side of the WRAP need to contact appropriate CENRAP states, probably an Air Director to Air Director contact. Document as you go.
5. If you think your state is going to be **late on submitting** the December 17, 2007 SIP, **talk to your EPA region and let them know what you think your revised schedule will look like.** Everyone at the IWG meeting understood that this could be a moving target, but keep your region informed as you go forward.
6. Think about **how we will do future SIP reviews** and how we can develop language to address the future work to **further investigate sources listed in item #3** that are not already addressed in this first SIP.
7. IWG will talk to FLMS again in August regarding BART decisions and the status of the non-BART list.
8. With regards the Improve Monitoring Network piece in SIP, Tom Moore has offered to write up some standard language, which all states can drop into their SIPs.
9. Have another IWG meeting in **August 2007**