

DRAFT
WRAP Allowance Tracking Information System Analysis Project
Draft Report Feedback Teleconference
June 12, 2003

The purpose of the teleconference was to discuss the Draft Report and issues identified during the preparation of the draft. Teleconference participants were Lee Alter from Western Governors' Association, Dwight Alpern and Lily Wong from EPA, Bob Gruenig from National Tribal Environmental Council, Corky Martinkovic from Arizona Department of Environmental Quality, and Peggy Quarles, Bill Balcke, and Justin Britt from PQA. The meeting started at 11:00 AM MDT.

Report Feedback

Prior to the call, Bob submitted comments and it was agreed that they would be incorporated into the Final Report. It was also agreed that the Final Report will increase the emphasis on the special requirements of the Tribal set-aside. The system design graphic on page 2 would identify the Tribal set-aside as a separate aspect of the system. Also, the text would discuss in more detail how the set-sides would be incorporated into the system. There was a significant discussion of the set-aside and how it would work. Although no final decisions were reached, the need to maintain individual tribal allocations private until the set-aside is transferred from a single reserve pool to the individual tribe was acknowledged as the key component.

It was also decided that the sentence on flow control on page 11 should be refer to the subsequent "year", rather than subsequent "years". Also, the reference to "People" on pages 4, 5 and 7 will be amended to define exactly which group of "people" PQA is referring to. At the conclusion of the call, participants agreed to extend the schedule for comments until June 27. A revised schedule is included below.

Issues

1. Model SIP/TIP, Appendix Part 5, Section F1 (or Model Rule, Section F1 (a)) requires use of AIRS ID in WEB ATS. It is likely that the AIRS ID will not exist as such over the timeframe of the program. We recommend use of a more generic term such as "facility identifier."

Resolution: It was agreed that this is an issue and the WRAP will address this issue in the Rule document.

2. Source Registration. For compliance accounts, it does not seem practical or necessary to require registration by the source representative prior to the allocation of initial allowances. This requirement would unnecessarily limit the TSA's ability to perform this task within the recommended first year after program trigger. The account can remain deactivated until the source representative registers. We recommend changing the language in the Section 309 STIP-2 Project, C. Stationary Sources, (c) WEB

Trading Program Requirements. 2. WEB Allowance Tracking System (WEB ATS) (page 49 of the May 16, 2003 draft).

Resolution: Peggy and Dwight will follow up on how this is being handled in the SIP Call process.

3. Source/Unit Inventory Data. We recommend that the primary requirement to submit general source/unit inventory data (such as SIC code, plant and unit IDs, plant name, etc.) be in the registration section of the rule. The monitoring section of the rule that references the same information should require use of information/identifiers consistent with the registration information. Based on Model Rule Section F1 (d), it appears the Implementation Plan can list the specific elements.

Resolution: It was agreed that source identification information should be included in the registration process and that subsequent information should reference that initial identification information. However, unit-specific information would come in as part of the initial (conceptual) monitoring plans.

4. Monitoring Plan Data. We recommend requiring submission of monitoring plans directly to the database on-line and then using on-line maintenance to update the plans thereafter. Monitoring plans should be maintained and updated, as necessary, independent of emissions reporting. (Currently, EPA requires the resubmission of a complete monitoring plan with each quarterly report. This approach has created data management problems for EPA and will probably be modified in the next few years.) The existing monitoring rule language does not contradict or support this suggested approach explicitly.

Resolution: The issue was acknowledged. There were no objections to assuming that this approach would be good.

5. Changing Monitoring Requirements. We assume that a source can decide to switch from Section I1.(b) status to conventional monitoring, but must do so at the beginning of a control period with appropriate notice to the State, Tribe and TSA.

Resolution: The issue was acknowledged. Corky agree that this would be the only feasible method of changing from I1.(b) status.

Revised Project Schedule

The schedule was revised to allow for more comment time.

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| (a) Contract Date | May 8, 2003 |
| (b) Draft Outline | May 22, 2003 |
| (c) Outline Comments | May 27, 2003 |
| (d) Final Outline | May 28, 2003 |
| (e) Draft Report | June 5, 2003 |
| (f) Teleconference to Discuss Draft | June 12, 2003 |
| (g) Draft Comments | June 27, 2003 |
| (h) Final Report | Week of July 7, 2003 |