

Memorandum

To: TOC Members/Forum & Workgroup Co-Chairs
cc: Tom Moore
From: Steven Arnold & David Jones (TOC Co-Chairs)
Date: May 2, 2006
Re: TOC/Forum & Workgroup Co-Chairs April 7, 2006 Conference Call Notes

Participants: Don Arkell, Dennis Schwehr, Doug Latimer, Steven Arnold, Tom Moore, Mark Fitch, Kevin Briggs, David Jones, Bob Palzer, Tamera Dawes, Alice Edwards

Status of the PM NAAQS Letter- Don A.

Don sent a draft a letter to the WRAP Board on the PM NAAQS. The letter covers most of the factors we discussed before and is broken down into several topic areas. States or Tribes that wanted to use the letter could do so. Concerns over the PM2.5 secondary standard and the CASAC recommendations were expressed as it was not clear what was being recommended by CASAC. The draft letter strengthens or clarifies a more general statement saying that the WRAP wants the standard to be science driven and generally the WRAP supports the CASAC position. The second major issue is the concern about having a NAAQS that does not exempt rural areas or smaller communities so that it is truly a NAAQS and not a large urban particulate standard. Marc P. provided some maps and data showing differences between Eastern and Western PM showing that the coarse fraction is considerably different between East and West and that coarse mass has a large impact on visibility. The question of equivalency of the PM coarse proposal chosen at 70 ug/m3 will not be exceeded in most Western areas but the current problems show that more coarse reductions will be needed to meet visibility standards or other sources have to contribute more to the reductions. Most of the States and Tribes are more interested in using the letter as a platform for their own letters rather than signing on to a general letter. Bob P. asked about clarifying one of the points, that the PM NAAQS should be applicable everywhere not exempting specific industries of the letter. Don said he was working on that and at Bob's suggestion he will try to use the word 'backsliding' in the letter. The deadline for getting the letter to EPA is the 17th of April. Arnold reported that Colorado is trying to get approval for its own letter and probably would not sign on to a general letter. Don will redraft the letter and get it out this weekend and those who have last minute comments can do so by Thursday the 13th. Some technical data is being added from Marc P. and CIRA and that will be added to strengthen the PM coarse discussion. Don felt that most States would not sign off on the letter but would use it as background. He reported that Idaho probably will not make comments. Don will send out instructions for States or Tribes that want to sign on to the general letter as to how that can be done.

Update on 2007 Workplan

The TOC needs to complete their section of the workplan. Tom will assemble a draft of the workplan based on discussions from the Strategic Planning meeting that occurred in Utah last month and the

various forums and workgroup meetings and input from the co-chairs and chairs. His target is to get the draft pulled together by late April but even at that the AoH group will not have met

Action: Tom will follow up and work with forum and co-chairs of workgroups and draft a final plan during April, so the TOC can review a draft by the next TOC call in May.

Brainstorm on Long Term (2007-2010) Strategic Plan

Long term plans need to be put together in the not too distant future. Several things are known that need to be done after the SIPs are submitted. Costs for maintenance of system like the EDMS, the TSS, possible modeling, tracking of Reasonable Progress, and other issues need to be considered. The Tribal Caucus will have a discussion with NTEC next week looking at using some of the systems like the EDMS as a basis for their work and so it seems clear that maintenance of these systems are needed. Don A. said that a general sense of States is that Federal funding will be declining and long term funding will be a critical question. Don asked for consideration of the balance between of RH and other state work be taken into account during the planning process. Maintenance of the data bases and systems can be costly and with declining funds it is necessary to consider priorities.

Action: The rough outline was provided and comments can be sent to Tom.

Technical Status Report

Tom sent out the long awaited status report and he walked through some of the critical issues. The modeling timeline has been modified and he asked for the forum and co-chairs look through the timeline to make sure all is in order. The draft is missing some of the details and they will be added at the back end of the document. Tom suggested members look closely at the tables and timelines.

Action: TOC has two weeks for comments and feedback and he will make changes as directed and complete it by the next TOC call. Don A. will distribute the current draft to IWG members with adequate qualifiers that this is a draft. Tom will indicate 'interim' in the title with a final expected by May's conference call.

Conference Call Schedule

May 5th, 1100 AM MDT

Topics

- Draft of forum and workgroups technical projects
- Final version of technical status report
- Update on April 25-27 AoH meeting