**REGIONAL HAZE PLANNING WORK GROUP**

**CONTROL MEASURES SUBCOMMITTEE**

**Notes of teleconference**

**June 22, 2020**

**Action Items that resulted from the call**

* Continue discussion with states on a potential PAC#2 run that is now slated for submittals due by September 10, 2020.
* Continue discussion of Four factor analysis and what states are considering to be reasonably available controls. Where are states at with respect to making any decisions on controls necessary for reasonable progress goals.

**AGENDA ITEMS**

**1. Roll call**

AZ-Elias, CA-Tina, CO-Curt & Weston, ID-Aislinn, NV-Steven, NM-Mark, OR- D, UT-Jay, WA-Phil, WY-Amber, WRAP-Tom, NPS-Kirsten, FWS-Tim, WESTAR-Mary

**2. Volunteer for note taking**

Mark Jones, NMED-AQB

**3. Approve meeting notes from last call**

Notes approved without changes.

**4. Quick update on each state's four-factor work**

AZ. Hope to have done by August; Outreach on area sources – stakeholder letter

CA: Confirming Four Factors in nonattainment areas. Also looking at attainment areas. Mobile source reductions more than stationary.

CO. Still doing technical analysis for the facilities Colorado is reviewing; there have been a few write ups on four factor analyses the state has reviewed from facilities. At this point Colorado has nothing to share regarding any determinations that have been made based on the state's review. Please email Curt Taipale of Colorado with any questions.

HI. Need to contact facilities for additional info on analyses the state has received so far. Example of issues that have arisen include interest rate and time horizons used in cost analysis; some equipment that has an air quality permit was not subjected to a four-factor analysis and should have been due to the existence of the permit. On the call the state summarized several other specific issues that have arisen.

ID. Waiting on additional information from facilities

NV. Sent additional info request in May for submittal July 1.Have finished review of four factor analyses from facilities, got comments from EPA on these, no big surprises there.

ND. North Dakota submitted emission reduction data in March to WRAP for modeling of potential additional controls, hasn't changed any determinations since then. Is evaluating some additional info, currently finishing draft determinations that will go into SIP. Will hold off formalizing decisions until later this summer.

NM. State is continuing four technical feasibility, Four factor including cost analysis, has gone back and forth a few times with sources, has begun posting on state's web site the facility responses to state's requests for more information. August 7th is state's next milestone -- New Mexico plans to be ready to discuss and re-engage with industry on information that was included in the state's submittal for WRAP's first modeling run for potential additional controls. State will consult with sources on any additional info that might need to change for the second additional controls model run by WRAP. It will take a couple of weeks to engage with all sources to get their feedback. State is planning a stakeholder outreach listening session on Regional Haze planning for late August.

OR. All four factors reports in. Permit writers helping. Doing individual review and group review EPA contact in. Aiming to get done as much as possibly review end of July. Need to be done by August on deciding on additional control.

UT. Received all the analysis and have initial review done. Requesting additional info from all of the sources. Getting analysis ready EPA, FLM, on website in July

WA: New cost control manual. This is what you need to use (EPA new cost control manual. Received info – asked some sources for add info. Looked at what need to do. Write draft of what will do in the analysis. Send to FLMs in July for a small c. Discussed issue of some sources being in curtailment so low emissions, but what if they return to higher operation and higher emissions. Other states had similar cases and discussed some methods of handling this in the Four Factor analysis and reasonable control implementation.

WY. Wyoming got a majority of requested four factors back, still waiting for a few, reviewing and analyzing what we have. Hoping in the next month will have them finished and put on website.

**5. Discussion on potential PAC#2 run**

Utah: Planning to submit something

Arizona: Not anticipating too much change from 1st run. Some power plant info may affect emissions reductions in their long term plans.

California: Mobile source commitments going through rule review. State wide mobile source reductions planned.4-5 stationary sources being evaluated.

Oregon: Still working on it.

Nevada: PAC#1 submitted reductions – best guess. Not expecting major differences

Idaho: PAC#1 put in scenario best case scenario. After seeing 4-factor analysis coming in and being reviewed. Requesting info that could change the story a little bit - In between what submitted in PAC#1 and representative baseline. Hopefully can put into the PAC#2. More conservative.

Colorado: 4-factor sources relatively controlled. Have to be federally enforceable? In a proposed rule making sometime this year, and it’s dynamic. PAC#2 ? not sure if can nail down commitments – wants to have certainty in the reductions estimates – how done through legislature. Might look at as sensitivity have not decided

Tom (WRAP): I'd like to allow a month from the due date, but these are very targeted changes; it takes a week to 10 days to have computers run the modeling; there's some setup and QA and questions before starting; then post processing, all of which adds up to about a month.

Mark (NM) to Tom: what if we wanted to do mid-August submittal to WRAP for the second run, would that be too long to wait?

Tom (WRAP): if states that are going to submit proposed reductions want to wait as late as September, that's also fine, it's up to you all. Some states will be much further along with more formal consultations with FLMs, so later info is less useful to them; they would need to do some explaining to stakeholders regarding availability of results; but a delay in the submittal date until early fall would be compatible with the workload at WRAP. It's not super complicated to do the modeling once we have the inputs, so we're hoping states can think through what the results of the first control measure run mean in two or three weeks. So maybe we defer due date until after you've had a chance to look at the results of the first run.

**7. Other Topics?**

Next call: ? (isn’t it this week)