

June 5, 2018 Regional Haze Planning Work Group call minutes

1. Welcome and roll call – Jay (10 mins.)

a. [April 4, 2018 RHPWG call minutes](#)

Questions or concerns to Tina Suarez-Murias or Jay Baker if you have a suggested edit of the minutes.

Present on call:

AK, AZ, Albuquerque, CA, CO, HI, ID, MT, NV, NM, ND, OR, SD, UT, WA, WY, USFWS (Tim Allen), NPS (Pat Brewer) EPA Regions 6, 9, 10, Emma Ruppell (Tribal Data Workgroup), Mike Barna (Regional Technical Operations Work Group), Mark Jones (Oil & Gas Work Group), Bob Lebens (WESTAR), Mary Uhl (WESTAR), Julie Simpson (Nez Perce tribe), Phil Lorang (EPA Headquarters), Kevin Briggs (Regional Technical Operations Work Group), Tom Moore (WRAP&WESTAR)

2. Status of 2018-19 Work Plan Activities - Jay (10 mins.):

a. Task list concept

- The Task List is unofficial tool created by Frank Forsgren (Nevada DEP), taken verbatim from WRAP Work Plan, that consolidates Regional Haze tasks and activities, month by month in a single place, to allow easier tracking and organizing (aligning with the Gantt charts of critical Work Plan tasks) .
- Updates from subcommittees in phone calls of the RHPWG will result in updates to the Task List.
- **ACTION ITEM (completed): Jay sent out a copy of the Task List after today's phone call.**
- The group reached a consensus that sending the Task List out by email is preferable to posting it online.
- The Task List will help the RHPWG organize its work in the two months between check-in phone calls.

b. Web page outline (<https://www.wrapair2.org/RHPWG.aspx>)

- Tom Moore gave an overview of the revamped RHPWG web page (linked above).
- The web page will track RHPWG activities, including:
 - Subcommittee activities
 - Records of calls and meetings, such as agendas and minutes
 - Recordings of webinars, teach-ins

- The web page offers links to reference materials, such as the WRAP 2018-2019 Work Plan and current version of WRAP TSS web site.
- Pages for RWPWG subcommittees are still skeletal but will include rosters, responsibilities, and work products.
- For web site technical/navigation help, contact Tom Moore or Pat Brewer.
- For suggested changes to subcommittee pages, contact the subcommittee lead.
- For suggested changes, to overall web page (not subcommittee pages), contact Jay Baker or Tina Suarez-Murias.
- Discussion among the group noted the intent to have additional Federal Land Managers represented on subcommittees. Currently, Pat Brewer is on each subcommittee call and Julie Simpson is on Consultation and Coordination.

3. Updates and next steps from Subcommittees – Subcommittee Leads (30 mins.)

a. Coordination/Consultation. Rebecca

Report from the subcommittee covered the following.

- First call took place on May 8, will hold further calls monthly.
- Purpose of group: create structure for formal and informal state to state, state to tribe, state to FLM communications.
- The intent is to put together a key contacts list to facilitate each of these linkages; the subcommittee will consult with FLMs and with tribal data group on this effort.
- The subcommittee is reviewing documents and information from the first Regional Haze planning period, seeking any work that was done regarding informal consultation and tribal engagement.
- The subcommittee will draft a framework of best practices for states to follow in FLM consultation process. The subcommittee would like to hear from states on what worked or didn't work in first planning period.
- Subcommittee would also like to receive from states any documents from the first planning period that would be helpful in establishing best practices, e.g. templates, agendas.

Discussion after the subcommittee report covered the following.

- The National Tribal Environmental Council was used to facilitate contacts with tribes during the first planning period, but this body was not really a coordination mechanism per se and in any case no longer exists.
- For the second planning period, Tom Moore suggested that the subcommittee develop a protocol for providing a progress report on coordination and consultation to be delivered during bimonthly RHPWG

calls, in order to document contacts that are taking place among/between states, tribes, FLMs, regional EPA offices, EPA headquarters.

- Tom Moore suggested that both formal and informal contacts should be documented as part of progress reports in order to meet coordination and consultation requirements.
- Tina Suarez-Murias recommended that states keep a log of all their contacts with FLMs throughout the planning process. This will be more in keeping with the Regional Haze rule than waiting for a last minute, 60 day consultation period.

b. Control Measures.

Report from the subcommittee covered the following.

- First call took place on May 22, was well attended.
- Call discussed purpose & objectives of subcommittee: to assess feasibility & cost of controls of sources that are identified as impacting visibility of a Class I area.
- Discussed screening thresholds, pollutants to be considered, sources and attribution, various approaches (Q/d, weighted emissions potential, etc.), doing four factor analysis (lists 4 factors).
- Deliverables discussed & actions items: task list developed, with schedule of deliverables due over next 18 months.
- Identified action items:
 - get each state to review 2014 NEI data, suggest updates
 - identify highest emitting sources in baseline period
 - identify procedures for doing four factor analysis
 - decide whether to evaluate visibility as fifth factor
 - conduct regional/state screening of sources to determine final group to undergo four factor analysis in each state
 - identify possible control strategies for each state to implement by 2028 and obtain reductions that will achieve Reasonable Progress Goals
- Call discussed need for close coordination with emissions inventory subcommittee: need for improvements in emissions inventory -- pivot table needed to make it easier to look at sources & associated emissions.
- Next call in July.

Discussion after the subcommittee report covered the following.

- Discussion clarified that goal for subcommittee is to develop template for every state to use and modify as necessary (according to particular mix of sources in a state) in developing method/protocol for conducting four

factor analysis – subcommittee doing this will help states that don't have staff and resources to do this themselves

- Tom Moore pointed out that a regional analysis must be completed before individual states can do their individual control measures evaluations; this regional analysis should be covered in next call.
- **ACTION ITEM: Tom agreed that in the next RWPWG call he will go over what will be entailed by this regional analysis, how that analysis will relate timeline for modeling and for producing tools that states will need to develop their SIPs.**

c. Emissions Inventory and Modeling.

Report from the subcommittee covered the following.

- No subcommittee call has taken place yet at time of RHPWG call. Suggestion was to wait until after today's call to do that.
- Subcommittee sent out NEI v2 summary to work group members with request to identify any glaring problems. Some members have responded, subcommittee awaiting responses from others.
- **ACTION ITEM:** if subcommittee members haven't responded to this request for information, please respond by June 14, via email to Farren Herron-Thorpe of Washington Department of Ecology, farren.herron-thorpe@ecy.wa.gov.
- Subcommittee will have more to report after first call.

Discussion after the subcommittee report covered the following.

- Discussion reiterated that Regional Haze planning by the Work Group will proceed using 2014 All states need to review the NEI document sent out by Farren and note any changes that need to be made.
- Tom Moore has sent a list of specific questions to state leads of RWPWG to guide state responses to Farren's request for feedback on NEI.
- **ACTION ITEM:** Tom asked Farren to forward to Tom via email whatever NEI feedback Farren has received.
- Overall objective of reviewing the NEI:
 - Make sure the emissions inventory data used for Regional Haze planning is tailored particularly to that effort, rather than just incorporating 2014 NEI v. 2 wholesale.
 - We want to make sure specific source categories are well represented, including mobile sources (states provide inputs for NEI on mobile sources even though they do not regulate those sources) and oil and gas sources (on which a number of states have done targeted emissions inventory work).

- All of these state-specific efforts need to be reflected properly in the emissions inventory used for Regional Haze planning.
- **ACTION ITEM:** Tom will circulate a wiki he is developing on tailoring emissions inventory work to Regional Haze Planning.
- **REMINDER:** Tina Suarez-Murias and Jay Baker reminded everyone that each state's Regional Haze lead is responsible for making sure that requests for feedback (like Farren and Tom's inquiry on emissions inventory information) are circulated to the appropriate people in their state team.

d. Monitoring

Report from the subcommittee covered the following.

- Subcommittee has had a handful of calls thus far.
- Focus now = two tasks
 - Identify method for calculating most impaired days, ideally accounting for wildfires, dust storms, volcanoes, international, etc.
 - Determine estimation method for natural conditions.
- Subcommittee has done the following:
 - identified tools to evaluate EPA guidance approach to most impaired days;
 - identified representative Class 1 Area sites to use in evaluating technical methods to be used in monitoring analysis;
 - started developing documentation on work scope, work done to date, work remaining to be done.
- Current issue the subcommittee is working to figure out: which IMPROVE dataset to use as work proceeds.
 - Will need to consult with other groups because IMPROVE dataset will be locked down after decision date.
 - Will memorialize whatever dataset is chosen.
- Subcommittee also needs to finalize path forward on most impaired day and e3 ("extreme episodic extinction") threshold; scope out natural conditions work; will need to work with database subcommittee to make sure monitoring analysis needs met.

Discussion after the subcommittee report covered the following.

- Discussion covered contacts to date between the subcommittee and the IMPROVE steering committee.
 - Subcommittee has been in touch with Scott Copeland (US Forest Service), the IMPROVE "data guru" who is in charge of putting IMPROVE data on website.

- Subcommittee has contacted him to get idea on where they are in processing data, updating methods. Wants to get idea of when data through 2016 will be available. Scott says right now is pretty good time to regard data as final, but there are still some format issues with dataset posted online. Scott working on this.
- Subcommittee has talked about utilizing data from different source. Will continue in touch with Scott on how/when can begin working with federal dataset.
- There was extensive discussion over how to handle substituted data, i.e. addressing data gaps due to exceptional circumstances, such as monitor data not being available at a particular site due to a fire event and data from a nearby site being substituted instead.
 - Scott Copeland has developed a particular methodology for addressing data gaps.
 - State Regional Haze planners and WESTAR/WRAP need to sit down with Scott to go over his methodology and make decision regarding how to proceed, whether and how to adopt/modify that methodology or a different one.
- Discussion on the call resulted in consensus that the Monitoring subcommittee will be addressing the subject to approach missing data.
- Pat Brewer (National Park service) noted that LADCO (Lake Michigan Air Directors Consortium) states had a Regional Haze call recently and asked Scott Copeland to work with them on implementing their own approach to Regional Haze monitoring analysis; this is precedent now for other Regional Planning Organizations to make similar request.
- Discussion on the call noted the need for greater understanding of the extent to which monitor data appearing on the TSS is “stable,” i.e. locked down and not subject to later modification, e.g. due to need to fill in gaps in data.
 - Tina Suarez-Murias noted that in the past, her understanding was that data on IMPROVE web site was “fluid,” in process, thus harder to use, whereas data on TSS was the final, approved dataset, ready for use. States need to be clear on which internet site to go to so that they can pull and analyze finalized data.
 - The monitoring subcommittee will follow up on this subject with the shared database subcommittee.
 - The monitoring subcommittee needs to establish a protocol for TSS data stability – a process for deciding how the data gets finalized and making sure everyone has a common understanding of when/how the data is stable.

e. Shared Database

Report from the subcommittee covered the following.

- Subcommittee has held one call, May 9, next call June 14.
- Immediate focus of subcommittee: get walkthrough from CIRA (Cooperative Institute for Research in the Atmosphere, Colorado State University) collaborators and Tom Moore re: what's on TSS, what are tools we have from Round 1, what kind of data visualizations can states get from it. A lot of people weren't around for Round 1 planning.
- Goal of the subcommittee:
 - creation of one stop shopping area for planners to find correct, stable data, visualize it, get information on emissions, modeling too;
 - the one stop shopping resource should take info from monitoring and emissions/model subcommittees, funnel it into TSS.
- Subcommittee will help the staff working on TSS know what states need, how it needs to look, how states need to access it.

Discussion after the subcommittee report covered the following.

- It was agreed that, once the subcommittee has done a walkthrough of the current TSS with Tom Moore, the subcommittee will work to develop a general "TSS 101" webinar for all state Regional Haze planners, to introduce them to the data access tools that are available and solicit feedback on what the data needs of the planners are.
- Those with ideas and feedback on the TSS should contact Cindy Hollenberg of the New Mexico Environment Department, cindy.hollenberg@state.nm.us.

4. Roundtable updates on other Work Group Activities (20 mins.)

a. Key projects

- Regional Technical Operations Work Group update
 - RTO has finished round 1 of study on data representativeness, which is available on the RHPWG web page.
 - Currently discussing draft Request for Proposals – regarding Regional Haze modeling analysis. Waiting for review of draft. Tina noted that the Emissions Inventory and Modeling subcommittee of the RHPWG is available to assist with this RFP.
- Oil and Gas Work Group.
 - Backdrop: oil and gas work plan was published Oct. 2017, currently there is a contract established.

- Activities under work plan include current and future year assessment, improving activity information.
 - Work divided into phases. Phase 1 completed May 2018: base and future year inventory review. Phase II: fill data gaps, working on 2014 inventory reconciliation of data gaps, identify emission factors and speciation for oil and gas sources, filling of gaps associated with that .
 - See WRAP website for information on work group activities
 - At next call, work group will be talking about 2016 modeling platform for oil and gas, how to get necessary consistency.
- Fire and Smoke Work Group update
 - Tom Moore reported that work group is reviewing emission inventory, smoke management plan tasks, per their work plan, will be updating fire emissions tracking system for planned fire activity, which has been identified as priority.
 - With so much inter-annual variation in time, space, magnitude of fires, the group will be recommending that we use some kind of baseline dataset, representing “normal” or “average” fire activity, rather than only modeling years with low fire activity around region.
 - **ACTION ITEM:** Tom and Tina agree that Fire and Smoke work group discussions should be brought to RHPWG.
- Tribal Data Work Group update.
 - Have put together short list of proposed projects, hoping these can be biddable, depending on responses they get, or do in kind work
 - Made presentation to NAU ITEP (Northern Arizona University, Institute for Tribal Environmental Professionals) and NTAA (National Tribal Air Association) on projects related to groups work plan.
 - Summary regarding NAU ITEP and NTAA: no official response yet (due in next week or two), but there might be path forward for these bodies to assist with consultation and outreach, details to be fine tuned on how and who.
 - Tribal Data Work Group also presented projects on tribal data gap studies, but these projects not as clearly best match with the above entities (NAU ITEP and NTAA); these projects have to do with NEI and EPA Air Quality System regard tribal data not included in these databases. This data is a priority, work ongoing.
 - As far as consultation tasks, the work group is very concerned, keeping eye on related tasks in Regional Haze work plan.

b. Activities related to Regional Haze

This item in the agenda was skipped in the interest of time.

5. EPA Update on Rule and Guidance - Jay (5 mins)

EPA had no report regarding EPA's review of the Regional Haze rule and or potential issuance of updated Regional Haze guidance, beyond noting that internal work at EPA is ongoing.

6. Protocol for Information Exchange (SIP related) (10 mins) (Jay)

a. Who sends what to whom

- Jay Baker had nothing to report on this subject for this call, will save a report on this for next RHPWG call.
- **ACTION ITEM (completed):** Jay re-sent by email the Master List of contacts, providing contact info for state leads and subcommittee members.
 - RHPWG members can use this list as a guide on who to contact regarding particular subjects.
 - If you need guidance, just don't understand something, or have a concern, contact the relevant subcommittee chair, with CC to Jay, Tina, Tom.
 - If enough inquiries are received on a particular topic, this may indicate that a webinar is needed.

b. What education is needed

This item was skipped in the interest of time.

7. Next call for RHPWG - August 7, 2018