

July 25, 2018 Control Measures Subcommittee Conference Call

1. Introductions

Roll Call: Rebecca & Craig (MT), Rob (WY), Kirsten (NPS), Tina (CA), Curt & Jeremy (CO), Kerwin (NM), Tom (WESTAR/WRAP), Frank (NV),

Based on the table distributed by Tina, the Control Measure Subcommittee calls will be 4th Wednesdays, monthly

2. May Homework - source assessment of 2014 NEI

Frank: Nevada went through facility level to identify largest sources for NO_x and SO_x
Kerwin: NM looked at source categories

Curt: CO has looked at biggest sources, and have found mostly the same sources we looked at in the first round. We intend to focus mostly on SO₂ and NO_x. PM₁₀ and PM_{2.5} may be more difficult but are useful to look at. Mines may come up for PM₁₀.

Tom: emission inventory and modeling protocol subcommittee is meeting tomorrow. They've had some comment on inventories from nearly every state. Haven't received comments from Oregon or Utah. So, they may not have looked at control measures either. We should try for some more outreach. We are modeling the year of 2014, so what year do we want as baseline for control measures analysis? Would it be appropriate to look at a 5 year average?

Curt: it may depend on the state. CO used a 3 year average in the past.

3. Source Evaluation Process

-pollutants to evaluate? known criteria: NO_x, SO₂ and PM?

-identify/screen big point sources over predefined emission threshold?

-combine source distance from CIA?

Curt: how to identify and screen them. Look at inventory and do a sorting from lowest to highest emitting? Last round CO screened at 100 tons per year. Distance to C1 area should also be a factor: $Q/D = \text{emissions} / \text{distance}$ (20 was used as the benchmark for the last round for CO RH SIP)

Tom: We can also look at the 5th factor: visibility. Is there a concern that screening out based on distance may screen out sources that do have visibility impairment contribution?

Curt: We should probably focus on point sources since there are actual possible reductions to be had.

Tom: Oil and Gas workgroup is working on the differences in how states define point and nonpoint sources in O&G.

Tina: Could look at a radius around C1 areas for specific sources.

Tina/Tom: There should be a defined pathway for what we can't change. We're not limited to just a 4 factor approach for that which we can't control.

Curt: States need to use their own judgement for what will be practical in their state.

Jeremy: Nonattainment area SIPs will likely drive many of the reductions for RH

Kerwin: NM has the authority to evaluate controls for areas exceeding 95% of ozone standard, and NM will use that for RH purposes as well (for NOx).

4. Source ID and 4-factor review process

-do states want to ID sources for review? contractor?

-4-factor review? Contractor?

Frank: Nevada won't need a contractor. CO feels the same way.

5. Next Steps

Conclusions.

Tom: We should talk more about a tiered screening approach. We should also look at utility Integrated Resource Plans to see what's going to happen based on the markets. EGU's are an important sources still to carefully analyze.

Curt: Not a strong desire for contractor help.

Tom: We should sketch out the work load for individual states.

Curt: Committing to writing up a protocol and a schedule to propose to the group. States need to commit to commenting to inform the protocol. This will give states a sense of whether they can do this internally. We can then take that to the bigger WRAP group.

6. Next Call: August 22nd (Wed.) at 10am-11am MDST

Curt can't make the next call, so Jeremy will coordinate the call and Tina will help with the group discussion.