**Monday, June 17, 2019**

**Notes by Aislinn Johns, Idaho Department of Environmental Quality**

**Attendance**:

Elias Toon (AZ), Curt Taipale (CO), Weston Carloss (CO), Aislinn Johns (ID), Rebecca Harbage (MT), Craig Henrikson (MT), Brenda Harpring (NV), Kerwin Singleton (NM), Mark Jones (NM), Rob Leteff (WY), Emily Weissinger (Ramboll), Tom Moore (WRAP), Tim Allen (US FWS)

**Action items that resulted from the call**:

* Curt to send out CO 4-factor examples from the 1st implementation period.
* Curt to send a Doodle poll for the next meeting for the 4th week of July.

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

Approved.

**2. Volunteer for note taking**

Aislinn Johns from Idaho and Weston from Colorado

**3. Discuss Q/d screening tools and questions**

None

**4. Emily to discuss CIA 400 km radius and facilities with Q >4000 tpy analysis**

Emily Weissinger walked the group through the latest revisions to Ramboll’s Q/d tools, based on feedback. The revised versions are available on the TSS at <http://views.cira.colostate.edu/tssv2/Emissions/QDAnalysis.aspx>.

Major points covered during Emily’s remarks:

* User can develop short list of facilities ordered by state instead of by Class 1 Area (C1A).
* Additional filtering options are now available.
* A supplemental table referenced in the methodology memo now includes a list of 150 facilities that have Q > 4,000 tpy, d > 400 (i.e. are located > 400 kilometers from the closest C1A), and thus have a Q/d > 10.
* Rambol has created a map file that contains the above sources with the 400km radius surrounding the C1As <http://views.cira.colostate.edu/tssv2/Emissions/QDAnalysis.aspx>
  + States can access the map file by downloading the file and opening the map in google earth (<https://views.cira.colostate.edu/data/TSS/Ramboll/WRAP_Q_Over_D_Analyses/4000tpy_Facilities_and_Class_I_Areas.kmz>)
  + Or states can use the interactive map on the Q/d Analysis website.
* Curt pointed out that the radii follow the C1A boundaries so they may not be a perfect circle surrounding the area.

**5. Status Updates on state RP Source notification**

Each participant on the call briefly described progress in their jurisdiction toward notifying sources that they would be subject to a Four Factor analysis and beginning the process of obtaining control cost information.

The table below shows the most recent updates for each state’s jurisdictions. Information from the last call was retained for states that did not report updates.

|  |  |  |
| --- | --- | --- |
| **Jurisdiction** | **Has notified sources?** | **Notes on methodology** |
| Alaska (phone call with Molly) | No | Tentatively, using Q/d>10 with Q>25 tpy. Tentatively identified 7 sources, including an airport and AFB |
| Albuquerque (Ed) | Have begun discussion with the one reasonable progress source identified for Albuquerque-Bernalillo County. | Albuquerque working in concert with New Mexico for unified statewide analysis. See entry for New Mexico, below. |
| Arizona (Elias) | Has held stakeholder meeting April 1st. | Currently using a Q/d of 20, about 15 identified sources. Have received feedback to lower Q/d to 10, which could bring in 3 additional sources. Those numbers exclude airports and rail yards.  AZ is taking considering feedback from EPA, Environmental groups and sources to potentially adjust their proposed Q/d methodology. AZ asked how other states were looking at Area sources. |
| California (Tina) | Began outreach to 35 air districts, EPA, and to FLMs | About 50 sources per Q/d of 10, and comments from EPA and NPS |
| Colorado (Curt) | Held a stakeholder meeting with 22 sources, FLMs, and environmental groups to answer questions and present the schedule for 4-factor input | Using Q/d threshold of 10 based on Q over 25 tpy. Currently 22 sources identified. |
| Hawaii (phone call with Mike Madsen) | 8 sources identified. | Using Q>25 tpy and Q/d threshold of 10. 8 sources identified, two airports screened out and sugar mill shutdown. |
| Idaho (Aislinn) | Have not yet contacted facilities. | Used Q of 25, Q/d of 2. The new list identified 10 sources. ID is no longer using CALPUFF visibility modeling for screening. |
| Montana (Rebecca and Craig) | Have notified all screened sources by letter and phone call. | Q/d of 4, looking at NOx and SO2 only. Identified 17 sources.  MT brought up the need to clarify the differences between the representative baseline and 2028 emissions as some EGU sources may be producing much more in 2028 than present. |
| Nevada (Brenda and ) | Currently waiting on approval of draft letter and plans to schedule individual appointments with sources or hold a webinar | Q/d of 5, which initially identified 7 sources, one of which is an airport which will be excluded. |
| New Mexico (Kerwin) | Have not begun notifying non-Albuquerque sources as of date of call, will be notifying them by letter soon. | Q/d of 10, resulting in 13 sources for New Mexico outside Albuquerque-Bernalillo County. One source was identified for Albq-BC. Thus, 14 sources statewide.  Q/d of 10 only captures 70% ; Q/d of 6 captures 80% but would identify 24 sources, many of which are oil and gas. Still working on source identification methodology. NM is also required to reduce methane and ozone precursors. |
| North Dakota (based on email from David Stroh) | 10 sources notified by letter. | Using Q/d of ~10. PM10 excluded from Q. |
| Utah (based on email from Jay) | Contacted 4 sources | Currently evaluating whether to use a Q/d that is less than 10. |
| Washington (Phil) | Drafting letters to local air quality agencies that will go out the week after date of this call; letters to sources will go out the following week. | Q/d of 6.5, about 18 sources, excluding airport. |
| Wyoming (Rob) | Have not begun notifying sources. | Still finalizing Q/d analysis. |

Curt gave an update on the Oil and Gas Work Group call last week

* Curt updated the Oil and Gas workgroup on the Control Measures Subcommittee status
* He explained how different states may have different area source thresholds, so area source considerations differ from state to state.
* Rebecca H. contacted Curt about potentially starting subgroup to discuss how to deal with Oil and Gas sources. Curt asked if any states would be interested and MT, ND, CO and WY showed interest.
* Tom brought up that the Oil and Gas workgroup has a contracted task to assist in control activities.

**7. Four-factor work**

* Most states are still identifying sources and did not have 4-factor work questions at this time.
* Curt offers 4-factor examples from CO from the first implementation period. He also recommended looking into the EPA cost control manual (<https://www.epa.gov/economic-and-cost-analysis-air-pollution-regulations/cost-reports-and-guidance-air-pollution>)
* Curt suggests another meeting about this in a few months.

**5. Other Topics?**

* Tom brought up State call with EGUs to discuss 4-factor approach scheduled (June 18, 2019).
* Rebecca suggested Area and Oil and Gas sources be discussed at the next call.
* **Curt said states should identify what their point and area source thresholds are before that call**
* Tom also suggested thinking of regulatory mechanisms for the above sources.

**Curt to send a Doodle poll for the 4th week of July.**