

Northern Class I Areas Consultation

Draft Minutes

July 25, 2006

1:30 – 2:30 pm CDT

Attendees	Minnesota	Gordon Andersson, Mary Jean Fenske, Catherine Neuschler, David Thornton
	Michigan	Cindy Hodges, Bob Irvine, Assad Khan, Teresa Walker
	Iowa	Matthew Johnson, Wendy Rains
	North Dakota	Tom Bachman, Dana Mount, Terry O'Clare, Steve Weber, Rob White
	Wisconsin	Larry Bruss, Bob Lopez, Farrokh Ghoreishi
	Tribes	Charlie Lippert – Mille Lacs (MN) Brandy Toft – Leech Lake (MN)
	FLMs	Meredith Bond – USFWS Trent Wickman – USFS – Superior
	RPOs	Mike Koerber – LADCO/MRPO Jeff Peltola – CENRAP Brandon Krogh – CENRAP/Minnesota Power
	EPA	Matt Rau – EPA Region V

Agenda Items

General Overview and Future Direction

We discussed that the group will have to decide who wants to and should participate in future consultation. We also need to decide how to further move ahead with future consultation, whether that should be formal or informal at this point. Minnesota discussed some of the pollutants of concern and the contributions of other areas. It is clear that all four Northern Class I areas (Voyageurs, BWCA, Isle Royale, and Seney) will be above the uniform rate of progress, even with the implementation of CAIR.

Northern Class I Areas

The group asked whether the four Northern Class I areas should be approached as one group or two separate groups. It was decided that for efficiency it makes sense to consult on all four areas together, though this will widen the number of participants. Therefore, Minnesota and Michigan will share responsibility for directing these calls and the consultation process. John Seltz, Bob Irvine, and Mike Koerber will work together on this.

Future Consultation

Minnesota raised the question of how frequently we need to be meeting, every two weeks and once a month were suggested. It was suggested that we first need to have a better definition of what our consultation process will entail, and that we need to have some technical work and analyses done to determine what we know and what we need to figure out. Eventually, the group envisions the technical work being done to back up a meeting of policy makers to address these questions:

How effective will existing controls be in reaching uniform rate of progress?

How effective will additional upcoming control strategies (BART, controls for ozone nonattainment, etc.) be?

What other controls are needed to meet reasonable progress goals?

To answer these questions, the group agreed that the consultation process should include discussions of:

- BART implementation
- Visibility conditions (baseline, natural visibility, how we evaluate improvement)
- Addressing international emissions
- Culpability of states in Class I areas
- Actions states taking to reduce emissions
- Control strategy analyses
- Reasonable progress goal
- Long term strategy

It was suggested that we should aim for November have these informal discussions completed via conference call in preparation for a potential face-to-face meeting of higher-level policy makers.

Other Parties to Include

Other parties that the group thought should be invited to participate in the consultation process include the states of Missouri, and Illinois and Indiana (though they are smaller contributors to poor visibility in MI's Class I areas), the Ontario Ministry of Environment, Manitoba and Saskatchewan's environmental ministries, as well as the Tribes located within the borders of Wisconsin and Michigan as well as two Canadian First Nations in Ontario. John Seltz will work to get a distribution list set-up. **Participants in today's call should send email addresses to John Seltz (john.seltz@pca.state.mn.us) of those they feel should be invited to participate in the calls.** Charlie and Brandi said that they would forward e-mail addresses of tribes to invite.

Status Update

The states gave a status update.

ND: Has received draft BART analyses from 5 of 7 EGUs, which had to be sent back to the facilities for further corrections. These should be fixed in the next few weeks. The other two are being held up by a consent decree for NSR. The BART rule should be finalized by the end of the year. After modeling with BART is done, they will consider more control strategies.

IA: Modeling to determine BART applicability showed one source subject-to-BART, which is now slated for retirement. All EGUs are subject to CAIR, and at least one has indicated they will add controls to comply with CAIR. Waiting for PSAT run.

WI: Is in the BART rulemaking process and expects a final rule in January. Facilities will be notified if they are subject-to-BART by March 2007. Currently working on 3 stationary source rules: BART, CAIR, and NOx RACT. They are proposing that BART-eligible EGUs will need to implement BART, as IPM modeling is showing many utilities buying allowances rather than adding controls to comply with CAIR. Evaluating control measures for ozone in the east, and want to address SO2 for EGUs and papermills.

MI: Starting to collect information from facilities for engineering analyses. They started with non-EGU facilities, and found 6 affected facilities. These have been called about their selection as BART facilities and will be asked to do an outline of BART implementation. Due to EPA concerns, BART screening is being gone over and more facilities might be drawn in. BART engineering analyses done by end of year. Currently no CAIR enhancements.

MN: BART will apply to 6 taconite plants; BART engineering analyses are due in September. ND and MN will both do a 30-day comment period for external stakeholders on the BART analyses received from facilities. Have not yet decided if CAIR = BART or not, but have asked potentially subject-to-BART EGUs to do a BART analysis. Have not yet looked at control strategies beyond CENRAP-wide analyses, but will start to do so soon.

Next Up

Next call is currently set for Monday, August 14 at 10 am CDT. Bob, John, and Mike will work to set that up and finalize agenda. Items proposed for the agenda are:

- Review how we are calculating visibility conditions for 4 Class I areas (natural visibility, baseline conditions, status of meeting 2018 uniform rate of progress goal)
- Review analyses on culpability for Class I areas haze – who is contributing what pollutants

Technical Issues:

After the call, Larry Bruss suggested the following list of technical items that should be considered before we tackle the policy questions.

1. What do we know about haze in the Northern Class I Areas?
 - a. What are the chemical constituents that cause visibility impairment in the Northern Class I Areas?
 - b. What are the geographic areas and sources that contribute to haze in the Northern Class I Areas?
 - c. What are the meteorological conditions that are associated with good visibility and poor visibility at the Northern Class I Areas? Is there a seasonal effect to visibility impairment in those areas?
2. Do we agree on the technical basis for visibility related analyses?
 - a. What are the present visibility conditions and how did we calculate those values?
 - b. What are natural conditions and how did we calculate those values?
 - c. How did we determine the twenty percent best and worst days?
 - d. Have we appropriately corrected (compensated) for relative humidity in the calculations?
 - e. Are we using the most appropriate equation to calculate light extinction?

3. How do we test control measure effectiveness?
 - a. What are the control measures that are most likely to improve visibility in the Northern Class I Areas?
 - b. Do we have a single modeling platform that we can use to test control measures or strategies? If not, how do we compensate for the differences in the modeling between the various RPOs?
 - c. Do we address ammonia control measures?