

Northern Class I Areas Consultation

Minutes

September 6, 2006

8:00 – 9:30 am CDT

Attendees	Minnesota	Gordon Andersson, Mary Jean Fenske, Catherine Neuschler, John Seltz
	Michigan	Cindy Hodges, Bob Irvine, Jim Haywood
	Iowa	Matthew Johnson, Wendy Rains
	North Dakota	Tom Bachman, Dana Mount, Terry O'Clair
	Wisconsin	Larry Bruss
	Ontario	Mary Kirby, Peter Wong
	Tribes	Charlie Lippert – Mille Lacs Joy Wiecks – Fond du Lac David Jones – Huron Potawatomi Shannon Judd – Grand Portage
	FLMs	Bruce Polkowsky - NPS Trent Wickman – USFS – Superior
	RPOs	Mike Koerber – LADCO/MRPO Jeff Peltola – CENRAP
	EPA	Matt Rau – EPA Region V

Agenda Items

Tribal Participation

Mike is going to get agenda time on the September 21st call between EPA and the tribal representatives, and will explain our consultation process and ask the tribes to participate.

Status of Technical Questions

The Technical Questions document will be worked on by Mike Koerber and Minnesota. Minnesota will especially work to integrate CENRAP technical work. Several pieces need to be updated, such as trajectories, and a new version of this document is expected in the next few weeks. It was requested that an executive summary be added to the document, this will be done.

Update on BOWA Patched Data

As of last week, the VIEWS website has all the substituted BOWA data posted. Gordon sent out graphics of annual concentrations and components of light extinction, which would replace those graphics in the Technical Questions document. The 20% best and worst days in deciviews for BOWA 2002-2004 and the 5-year averages were also copied. The natural conditions estimates using the Natural Haze Levels II calculation and the new algorithm should soon be posted on the VIEWS website. (These were provided in the Tech Questions document Table 2 from the July 2006 Natl Haze II ppt presentation.)

Technical Questions – Control Measure Effect

Discussed 3rd question in Technical Questions document. The modeling results shown are from the most recent MRPO control strategy runs. Mike will add definitions of the control strategies on the right hand of the table and recalculate with the new IMPROVE equation. The memo needs to incorporate CENRAP control strategy runs. The main question raised was about an ammonia strategy, and the technical concerns raised in the document. Largely the group feels ammonia control strategies are more likely to be a policy than a technical question. The impact of ammonia control strategies depends on geographic area; in the ammonia rich west, controlling ammonia will have less impact.

MPRO has resolved several of the technical questions listed, namely the process-based model, understanding of deposition, model performance, and monitoring data. The technical question that remains is the impact of ammonia in multi-pollutant analysis, and the fate of other pollutants when there is less ammonia in the atmosphere; i.e. do the models address the full chemistry of ammonia? CENRAP did an ammonia scoping study, which will be reviewed and sent to the group if relevant; ammonia monitoring has been cut back. The agricultural/ammonia control strategy will stay in the RFP as a suggested area of analysis; knowing something about ammonia control strategies will help us explain why we choose (or not) to propose an ammonia strategy.

Control Strategy Scope of Work

LADCO has drafted a Request for Proposal for a contractor to conduct a four factor analysis to assess reasonable progress in the northern Class I areas. While the contractor is doing technical work to assist with the assessment, it is the state's responsibility to determine reasonable progress in the first implementation period (2018). The RFP includes both source category and source-specific strategies. The RFP should be issued by end of the week, with the contract starting in October. The contractor would deliver a methodology for doing the four factor analysis, and then use that methodology. MANE-VU and VISTAS are interested in the methodology. The analysis should take a targeted look at sources. The contractor will not analyze sources that will be conducting a more detailed BART analysis; however, completed BART analyses will be given to the contractor for those sources. Some source apportionment work from MRPO, MN and MI should be available when the contract starts, and this will also be given to contractor. Contractor will share draft work products with the group on future calls. **Comments on the RFP should be sent to Mike by Friday, Sept 8.**

BART Status Update

MI: Has 6 affected facilities, scheduled to have analyses by the end of the year. MI shared data from their CALPUFF modeling with the facilities. The draft rule is in progress. No materials posted on web yet.

MN: BART engineering analyses are due September 8 from taconite facilities and end of Sept from EGUs. MN will do a completeness review and will then make analyses available for stakeholders and impacted parties.

ND: Has received draft BART analyses from 5 of 7 EGUs, and expect 2 in the next few weeks. All will be posted on the web and available for comment. Their rule is in the final stages and should be effective January 1. Plan to submit BART section of SIP early.

IA: No major updates. Working through rule process, but rule won't go to Board until November. BART determinations will be made after the rule is finished. Currently no BART sources.

WI: BART rule has been pulled from September Board meeting; may go to October meeting for hearing authorization or may be delayed until after election. The final rule probably won't be done until spring. BART facilities will include 10 EGUs and 6 pulp and paper mills. Sources will do BART analyses.

Control Strategy Work

LADCO has posted work on regional air quality planning page at http://www.ladco.org/Regional_Air_Quality.html This includes white papers on stationary and mobile source candidate control measures. Contractor cost-benefit analysis on EGU control strategies is in house and will be posted soon. Modeling is also posted, such as MacTech BART modeling. Can be a starting point for contractor

CENRAP has posted all control strategy work on the webpage http://www.cenrap.org/imp_document.asp. Mostly work on ICI boilers and natural gas compressor stations, including general cost curves. No modeling of control strategies done as yet; eventually it is planned to model gas compressor and boiler strategies.

WRAP is working on area sources from oil and gas production. Expecting Attribution of Haze report 2 in October.

Administrative and Next Up

- Minutes from last meeting are approved and can be posted.
- The RTI scoping study done for CENRAP and mentioned on the call, "Ammonia Monitoring Recommendations" can be found on the CENRAP website [on page 2](#) of "reports & presentations" (there are no dates or authors listed for the reports & presentations) It includes a comprehensive literature review and some info on NH₃ role in particle formation and sources of NH₃. http://cenrap.org/reports_presentation.asp#
- Next call is currently set for Thursday, September 28 at 1 pm CDT.
 - Should be able to talk about contractor responses to RFP