DRAFT 4/25/17

Federal/State Technical Work Collaboration Group

Conference Call Summary

April 6, 2017

Welcome and roll call:

*Participating organizations included: EPA OAQPS, OAP, WESTAR/WRAP, Utah, MARAMA, OTC, New Hampshire, Maryland, SESARM, Georgia, North Carolina, LADCO, CenSARA, Texas, Missouri*

Overview of Report from the New Base Year Recommendations Subgroup:

*Alex Cohan (LADCO) explained the subgroup started with 2014-2016 data. They looked at*

*meteorology, emissions inventories, and exceptional events to help with deliberations. The subgroup’s recommendation is for EPA to use 2016 as the baseyear, but also model 2015 if resources are available.*

*Norm Posseil (OAQPS) suggested the next step is to collaborate on development of 2015 and/or 2016 emissions inventories and understanding certain types of exceptional events during those years (ex: fires, stratospheric intrusions). Mark Janssen replied the Inter-RPO EI group could help by starting to build inventories. Chet Wayland (OAQPS) said EPA will be embarking on a 2016V1 EI that will be used for initial model evaluations, but they have no funding yet beyond that. The Inter-RPO EI group will talk further about on its next call. Tom Moore (WESTAR/WRAP) suggested instead of generating V1 as a priority, it may be better to start with developing a plan on how to project 2014 to 2016 for each source category – akin to an EI prep plan.*

*Tom added exceptional events could be approached through routine analyses by an ongoing workgroup that includes regional offices. For example, are there regional analyses that could be done? Exceptional events are separate from the EI work because decisions are many months away. Theresa Pella (CenSARA) suggested it might be helpful to ask Rhea Jones to give a presentation to the group on the status of their activities.*

*Tom asked if EPA is modeling 2014 too? Chet replied they will be running the model for every year (2014, 2015, and 2016) for the Center for Disease Control task.*

Status of ERTAC/EPA group activities:

*Serpil Kayin (OAP) explained they now have the ability to run ERTAC inhouse at CAMD and on next month’s call will be ready to give a briefing on this and other things the subgroup has done since last June’s meeting. Rob Kaleel (LADCO) mentioned one key piece of modeling will be ERTAC data for a 2016 base year and 2023 projections and asked if there is a timeline for ERTAC to provide these products? Mark Janssen replied once EPA’s schedule for its 2016 modeling is known, ERTAC will need three-four months to build the new ERTAC baseyear.*

*Susan Wierman (MARAMA) asked whether the EPA draft guidance clarifies that states can use ERTAC with a 2011 baseyear to project to 2023. Serpil responded the guidance is at OMB for final approval, but per the draft guidance, states can use any method and tool with justification. CAMD did receive comments from ERTAC. Susan asked what kind of justification is necessary? Serpil said it would depend on what ERTAC would be used for and how. Julie McDill (MARAMA) added some changes the ERTAC group recommended were a clarification of the continuous misunderstanding that ERTAC can only be used for a maximum five-year projection (not true) and how ERTAC can model control strategies. Tad Aburn (Maryland) suggested CAMD should have a dialogue with air directors, not just staff, before they go final with the guidance.*

Status of 2015 Ozone NAAQS modeling platform data transfers to MJOs/states and completeness reviews to date:

*Norm said a consolidated response from MJOs and states on what is missing would work best. Theresa explained the forum set up in the Intermountain Data Warehouse is intended to provide that and asked the other MJOs and states when they might be ready to send something to EPA. Jim Boylan (Georgia) replied now might be good, since the first step will be to replicate what EPA has done. Georgia has already gone through and found a few things and suggested two weeks should be sufficient to get an initial list to EPA. LADCO said they are starting to reassemble SMOKE for groups that don’t use the EMF.*

Follow up on NODA comments to date - <https://www.regulations.gov/docket?D=EPA-HQ-OAR-2016-0751>

* Is it helpful for EPA to: identify receptors? Identify linkages? Identify cost of potential reductions? Identify budgets?

       Should EPA update its AQ analysis (i.e., receptors and linkages), identifying the scope of the ozone transport problem? If so, what is most useful to states?

       What type of tools or analyses could EPA develop and/or what type of tools are available to help assess emissions reduction and control obligations for EGUs and non-EGUs?

       What factors should be considered that would cause EPA to address transport differently in the East versus the West?

*Norm said EPA is assembling comments, but it will probably be several days before they have access to all of them. Depending on the number and substance, it could take several weeks to summarize and be ready to have a concerted conversation with the states. Dave Foerter (OTC) said the process sounds good, but is concerned other states would not be included in the conversation. Tad agreed talking about the comments would be helpful. Chet added everyone needs to consider prioritizing what comments would be addressed first because of timing if EPA needs to do something soon (AAPCA requested remodeling by August). Theresa asked for verification that the comment period would not be extended. Chet replied the commenters withdrew their requests for an extension.*

*Tom Moore said it sounds like there is a possibility there may be revised 2023 projection modeling? Chet responded that they have been asked to do so, but won’t know until EPA management gives direction. If they get the go ahead and states need the results by August, there will be a need to prioritize what can be done. Tom said western states will be post processing how different tests were applied. Theresa suggested to help, maybe states and MJOs could put together a top three priorities list. LADCO suggested it would help to see Norm’s list first; others agreed. John Hornback (SESARM) asked how soon would EPA be making a decision and how long would it take states to develop what would be needed? Julie asked if EPA could use ERTAC instead of IPM? Chet replied that decision is not off the table. Mark asked if a rerun of MOVES would be part of a remodel? Chet replied that though they haven’t seen all the comments yet, so far no one commented on the mobile modeling. Alison Eyth (AOQPS) added there is updated MOVES modeling for the 2014 NEI V2.*

Overviews of LADCO and MARAMA/OTC work to remodel 2011/2023 platform:

*Rob said LADCO has started the process to replicate EPA’s modeling. A longer term exercise, if files are available, is to run OSAT to get better feel for state-to-state impacts and source apportionment. Will add that to the EPA list of things needed. One other thing will want to do is rerun 2023 with ERTAC in place of IPM. One issue may be how to use the CSAPR update model ready files. The results will be for states who need to do attainment demonstration SIPs and for 2015 I-SIPs.*

*Joseph Jakuta (OTC) said they are putting together 2020 and 2023 screening emissions inventories. 2020 will be an interpolation from 2017 and EPA’s 2023. They plan to replace IPM with ERTAC. 2023 will be mostly using EPA’s modeling with replacing IPM and estimating an adjustment factor for the CSAPR update. Will need to develop EMF growth, using OTC point source files with a CSAPR cap. The goal is to be done by a June meeting. The quasi-SIP ready work includes updating 2011 chemistry. They also plan to remove rules no longer on books, mostly for EGUs (CPP); but also ones like the methane rules. It is anticipated some states will use the work for their 2015 transport SIPs and serious area attainment demonstration SIPs for the 2015 NAAQS. All will be with a 2011 base year.*

*Alison asked if the main difference between EPA’s run and OTC’s is use of ERTAC for 2023? Joseph replied yes. Chet asked about the domain size? Joseph responded theirs extends to the eastern borders of the CenSARA region and in the south cuts off GA, AL, and MS. Chet followed by asking if some MJOs are already doing revised modeling, would EPA also need to do? Joseph said their 12 km domain may not be as useful for other regions. Norm asked if there was a reason why OTC and LADCO and others couldn’t work together to come up with nationwide 12 km run rather than do in piecemeal manner? Jeff Underhill (NH) suggested for a new platform modeling for 2011 may work, but not sure there is enough mileage to do. Julie added one issue is that no RPO/MJO has the EPA platform set up yet. Tom added the set up is just one part of what is needed. Norm responded that it is the state’s job to do technical work for 110 SIPs and if there is already movement forward, can the next step to work together be taken? Chet added how to leverage work is one of the basics for this group. Thinking about now may be able to pull together and have something if EPA’s funds fall short. Susan said it seems everyone is working closely together on emissions inventories – ex: LADCO, GA, and MARAMA are all using 2023. She agreed it is necessary try to optimize resources and if EPA decides it can run 2023, states can provide EIs and let EPA do the modeling. Tad added that the issue of whether states can step up and help is a valid point.*

Next call – Thursday, May 4, 2017, 10:30 – noon eastern