DRAFT 07/12/17

Federal/State Technical Work Collaboration Group

Conference Call Summary

Thursday, June 1, 2017

*Welcome and roll call – Chet Wayland (OAQPS)*

* Due to the large number of participants (all states and regional offices were invited to the call), roll call was not taken.

*Summary of 2015 Ozone Transport NODA Comments and next steps*

* Norm Posseil (OAQPS) walked through the document sent with the agenda. EPA is now reviewing the comments at a refined level so cannot respond to individual ones at this time. Almost 50 organizations sent in comments. EPA divided them into four categories – overarching, policy, technical, and out of scope.
  + Summary of overarching comments – clarity of data and how much flexibility states will have; need for collaboration; EPA should remodel to reflect updates commenters provided; need for a more recent base year to take into account more recent data; WoE approach should be acceptable; modeled emission reductions must be enforced.
  + Summary of policy comments – the receptor identification process should be changed; maintenance receptors should not be included if 2016 dv is clean data; international transport should be considered and contributions should be removed from the dv before a decision is made; contribution threshold should be changed or alternatives allowed; other factors should be considered, such as collective contribution (from multiple states), different thresholds for nonattainment vs. maintenance areas; for NOx reduction potential, EPA should work with industry on cost and consider non-EGU sectors, look at high ozone days; caps should not be for shorter than ozone season; look at regional or super-regional controls.
  + Summary of technical comments –many comments were received on EGUs and NEEDS and/or IPM projections and EPA has started looking through unit specific comments to consider for future work. Non-EGUs controls should be revisited to ensure they were appropriately modeled. Will also look at on road and CMV and oil and gas emission updates. MEGAN should be used instead of BEIS was one comment. Modeling – should look at 4 km domain for coastal and mountainous areas and enlarge the modeling domain to include Canadian and Yucatan fires. Meteorology – use multiple years. The RRF should be changed from 3x3 matrix to grid that contains a monitor. OSAT vs. APCA – request is to use OSAT and look at individual source sectors by state. Jim Boylan (GA) added that for 4c, another difference is use of 1/x/1 instead of 3/x3 and some use the highest days while others use all days over 70 ppb.
  + Summary of out of scope comments – should complete FIPs for 2008 ozone quickly; address local controls before going to upwind states; should finalize modeling guidance and develop model performance goals; should be transparent in sharing model inputs.

Q&A

MARAMA – has EPA received management guidance about what staff should be doing with the comments? Norm – no further instructions at this time; approach now is look through the comments and update technical work as they develop a new modeling platform. Even if EPA is not able to do updated modeling for 2015, states using parts or the entire modeling platform may want to take into account some of the comments.

KY – on page 6, commenters about contributions in 2023 compared to 2017 should include the State. Also on page 4, the State sent in a spreadsheet with units shut down by IPM. Given that EPA may not be able to provide an updated platform, can states use 3rd party modeling data? Norm - one consideration states should keep in mind is trying to avoid inconsistent outcomes as they relate to downwind receptors and levels of contribution. If thinking of using different models and techniques, broader conversations may be useful.

NY – from a policy perspective, given that the NODA allowed presumptive approvability if a state used EPA’s modeling, how will comments be factored into EPA’s review? Beth Palma (OAQPS) responded it may need to be case by case as the 2015 designations are likely to be delayed, but the submittal date for transport SIPs cannot be delayed because it is tied to the NAAQS promulgation date. Norm added the process is that states will be working with regional offices, so questions can be raised that way. Beth added a July webinar for the regions on the ERTAC tool would help them understand how the tool can be used by states. Michael Ling (OAQPS) asked for clarification of where a presumptive approvability statement is made in the rule. [NOTE: New York was relying on 82 FR 1735, 1/6/17 – “The EPA believes that states may rely on this or other appropriate modeling, data or analyses to develop approvable Good Neighbor SIPs, which, as noted previously, are due on October 26, 2018.”]

KY - Sean Alteri asked if the modeling EPA will be doing for the 2008 Ozone Transport FIP to determine an appropriate pathway will be a rerun for the NODA modeling? Norm replied they are looking for analytical options to respond to the court decision, which has a deadline of 6/1/18 for estimating receptors and contributions. Sean requested there be a strong collaboration so the State can make an approvability SIP demonstration, assuming it will need to model as well.

MD – Tad said he agreed with Sean, as other states are anxious to develop and submit approvable SIPs for the 2008 Ozone NAAQS, as well as get a start on the 2015 Ozone I-SIP.

OH – Bob Hodanbosi commented that it may not be ideal for states to use different models and outcomes, but if EPA’s expectation is that over half the states need to agree with a modeling platform and control strategies, it is unrealistic. EPA needs to be thinking how it will react and review different approaches in SIPs it receives. Norm suggested a separate conversation to focus on the issues and collectively come up with options that may not burden the states and help EPA appreciate the differences states have.

MD – Tad said he agreed and it was time to start a discussion of what a regional plan might look like for states in the east. MD has done some work that most states may not have issues with.

MARAMA– what will EPA do with the emissions inventory comments for NEI 2014V2? Norm replied as they go through the comments on individual sources, they will probably reach out to the specific state. Alison Eyth (OAQPS) added the submission window for 2014 NEI V2 nonpoint is open until the end of July; however, mobile on road and non-road is closed.

Theresa pointed out there were two topics several commented on – one about the IPM data and the other about the contribution threshold. She noted the ERTAC/EPA group has been tackling issues raised in the IPM comments. On the threshold topic, western states are starting a dialogue with EPA regarding appropriate criteria for their section of the country and what comes out of that may be useful in determining if the current criteria are appropriate for the rest of the country. Norm agreed a threshold conversation makes sense to have with western states, and then use that outcome for a broader group discussion.

OTC – Dave Foerter said that looking at the contribution threshold comments, the mid-atlantic and northeast states did not comment that a change is necessary. Theresa suggested that point be part of the broader conversation.

*Status of the transfer of 2015 Ozone transport NODA platform data gaps to IWDW*

Theresa Pella (CenSARA) said all data gaps are filled with everything now with the IWDW.

*Progress reports by LADCO and OTC on regional work*

* Rob Kaleel – LADCO is still working with the NODA platform and has been benchmarking modeling capabilities with EPA. They weren’t getting the same results and found the reason to be FORTRAN compiler differences. They are now doing source apportionment modeling – both OSAT and APCA (computer time intensive so will take 2 months) – and will replace IPM with ERTAC for 2023. North Carolina asked if LADCO observed any differences in biogenic contributions - they are using CAMx 6.11 and finding big differences. Alex Cohan (LADCO) replied they haven’t looked into biogenic contributions, but is willing to talk offline.
* Joseph Jakuta – OTC has not started modeling yet, but decided on 2017 and 2023. They are also developing 2020 EIs for use in a nonattainment area SIP and would like to request EIs from EPA – the 2017 Ek and on road and non-road gridded files, untagged and tagged versions if possible. If other regions are interested, OTC can be responsible for sharing the data. Norm asked Joseph to send an email request to him and Alison. North Carolina added they would also like to have the Ek files. Norm reminded everyone that the files being discussed were used for the final 2008 Ozone CSAPR update.

*Action Plan Highlights*

Theresa mentioned she received one update, but found a couple of places she needs to follow up on. Reviewing the document can be added for next month’s call.

*New MJO coordinator*

Theresa announced that Mary Uhl, Executive Director with WESTAR/WRAP, will be transitioning into the role. Calls are scheduled through July so subsequent call appointments will be coming from Mary.

*Open mic*

IA- Was the Kentucky lawsuit because CSAPR was only a partial solution or for other reasons? Michael Ling – the decision means EPA must come up with a full solution obligation.

Next call – Thursday, July 6, 2017, 10:30 – noon eastern [rescheduled to Thursday, July 20th, 10:30-noon eastern]