

1. The meeting was opened by Alice Edwards, WESTAR President; and Randy Ashley, Confederate Salish, Pend d'Oreilles and Kootenai Tribes and Gordon Pierce, WRAP Co-Chairs. Introductions for everyone in the room and on the phone were made. Wyoming DEQ staff presented [Welcome to Wyoming](#).
2. The WESTAR [staff reports](#) were presented by Tom Moore, Bob Lebens and Jeff Gabler of the WESTAR staff. Mike Morris, WY, presented the [planning committee](#) report, Daniel Bon, CO presented the [technical committee](#) report and Gordon Pierce, CO, presented the [National Monitoring Committee](#) report. It was noted that PFAS might be an important issue for committees to track. Alaska noted that they are doing a soil remediation project at a PFAS-contaminated site and analyzing air quality. Idaho has a project to monitor stationary sources of PFAS and Wyoming has a combustor emissions study underway.
3. Tom Moore presented a summary of [WRAP Funding and Projects](#). Tom was asked about maintenance and operational costs after the conclusion of the regional haze work. Tom said that the WRAP TSC will be ready to present these costs in the spring. Tom was also asked about how the WRAP workload will change when regional haze work is completed. Tom said that the regional haze work will wrap up in the spring of 2020 and planning work will be dialed back after that.
4. Mary Uhl presented [upcoming meetings](#).
5. Marianne Rossio, WESTAR Treasurer, presented the WESTAR [financial report](#).
6. Scott Mathias (EPA OAQPS) presented the [OAQPS Update](#). Scott was asked about the 25% of all nonattainment areas nationally that are PM₁₀ nonattainment areas and the reclassification of these areas. Scott noted that many of the current PM₁₀ nonattainment areas do not have monitors, so getting clean data is impossible. He also said that in areas where there is clean data, states need to submit approvable maintenance plans. Scott was asked about the October 9 Executive Order on Promoting the Rule of Law Through Improved Agency Guidance Documents and how EPA is implementing the Executive Order. Scott said EPA is awaiting further instruction. Scott was asked about air quality trends and worsening air quality in some parts of the west and urged that EPA focus on outcomes instead of outputs. Finally, Scott was asked about the Advance program and the advantages of the program. Scott said the advantages are to jumpstart engagement with stakeholders. CMAQ funds don't likely begin to flow from Advance participation. Oregon noted that their Advance participation allowed for engagement of stakeholders and helped to justify rules that are state-wide as a catalyst for action. Idaho noted that they haven't yet seen the benefits of participation.
7. Nancy Seidman of the Regulatory Assistance Project (RAP) presented [Transportation Electrification and Beneficial Electrification](#) and about the [Arkansas Regional Haze SIP](#). Nancy noted that there will be a December 5 RAP webinar on EPA's benefit per kilowatt-hour tool that translates kilowatt-hours saved into health benefits. Nancy was asked about wood stove replacement programs and the efficiency and reliability of heat pumps. Nancy noted that batteries are coming on strong. On the regional haze presentation about incorporating renewable and energy efficiency measures into regional haze SIPs, Nancy noted that stats can calculate avoided emissions using the AVERT tool. Nancy was asked whether EPA region 6 was "on board" with the Arkansas regional haze SIP incorporating energy efficiency. Nancy noted that Arkansas did engage early with Region 6. Scott Mathias noted that EPA is still looking into this approach. Nancy was asked about the enforceability of the energy efficiency measures. She answered that in Arkansas the state Public Regulation Commission puts energy efficiency measures into law, so the measures are federally enforceable. Nancy was asked if Arkansas had other control measures besides energy efficiency in their regional haze SIP. Nancy responded that Arkansas still had to evaluate their sources using the 4-factor analysis.

8. Chet Wayland (EPA OAQPS) presented [The National 2016 Emissions Modeling Platform Update](#). Mary Uhl and Tom Moore circulated a draft of WESTAR and WRAP member comments on the 2016 platform development process. Chet was asked whether EPA will financially support the Intermountain West Data Warehouse, given the success of disseminating the 2016 platform via the warehouse. Chet said that EPA was considering that. Chet was asked about the model performance of the 2016 platform and responded that it is better compared to 2011 platform performance. Chet was asked whether EPA would consider an NEI year for the next EPA Emissions Modeling Platform. Chet responded that in the future EP will try to do this.
9. Presentations on low-cost sensors and community monitoring were given by [Andrea Clements, EPA](#); [Gordon Pierce, CDPHE](#); and [Chet Wayland, EPA OAQPS](#). Dave McNeill noted that research universities in Utah are co-locating sensors with some of Utah DAQ monitors. Andrea said that EPA would like to obtain that data. Garry Kaufman noted that vendors in Colorado are providing methane sensors for oil and gas development in Colorado. Andrea said that there is some work at EPA on methane sensors, but most commercially available sensors measure total VOCs and it is hard to get methane concentrations. Very few sensors can speciate, the sensors that do “miniaturize” gas chromatographs. Andrea emphasized that correction factors for sensors vary greatly across the country. Wyoming is working on a sensor study, as is UC Boulder. NV DEP has purchased some sensors that they are testing and would like to use during wildfire season.
10. Bob Lebens presented on [residential wood heating](#). Alice Edwards said that Alaska is looking at cordwood test method results and may not allow some devices that don’t perform well in short-term but still meet the cordwood test method standards due to the lengthy testing time of current methods. Dave McNeill noted that in Utah they have found that even certified stoves are not used properly and have higher emissions. Utah is interested in initiatives to educate woodstove users and suggested that burning wet wood should be part of EPA’s test method. Utah has banned outdoor wood boilers.
11. The ACE Rule Roundtable asked member agencies the following questions:
 - a. Is your agency affected by the ACE Rule?
 - b. If so, what is the status of your agency in the planning process?
 - c. How will the ACE Rule impact your state/local/tribe?
 - d. Are there lessons learned that you can share with the group?
 - e. Is there any assistance that WESTAR can provide to your agency?

Responses:

Arizona: 9 coal-fired EGUs at 4 plants in the state. First stakeholder meeting will be Friday, November 8.

Arizona was on track to meet the CPP and will meet ACE. Arizona would like WESTAR to develop a workgroup to share best practices.

Nevada: 2 coal-fired power plants. Nevada was on track to meet CPP; hasn’t started working on ACE.

Utah: Utah meets the CPP.

Montana: 4 EGUs, one is shutting down in 2021. No problem to meet ACE; haven’t started planning for ACE. Montana would like WESTAR to provide a forum for states to share information on ACE.

North Dakota: 12 affected units, 2 are shutting down. Learned from CPP that a state can do a lot of work that doesn’t matter. North Dakota would like WESTAR assistance in measurement, training and permit conditions.

Colorado: 14 EGUs, 1 shutting down, more will shut down. Meeting with EGUs this winter. State rule goes well beyond ACE requirements, but Colorado must still integrate ACE into its broader goals. Colorado would like WESTAR to track progress.

Pima County: Working with state to provide local emissions data.

Northern Cheyenne and Crow tribes: affected by rule.

Oregon: WESTAR should track litigation and the NSR provision that was decoupled from the ACE proposal.

12. Scott Mathias provided a brief status update on 179B. EPA is still working on both the technical and policy guidance aspects of 179B. There is no estimated release date. Scott noted that EPA Region 9 recently proposed approval of Imperial County (CA) 179B demonstration for the 2008 ozone standard. The proposed

approval was published on November 1 in the Federal Register, so it is in the comment period. Colorado noted that at this point, the state is less interested in a 179B demonstration and likely not moving forward on such a demonstration soon; however, Colorado is interested in the concept technically—What is the impact of a successful 179B demonstration? The CAA is unclear. Scott was asked how 179B works with section 115. Scott responded that the CAA is unclear on that. It was noted that New Mexico is pursuing a 179B demonstration for Sunland Park, NM; the technical analysis has been completed, but it would have been helpful to have a technical protocol. Scott hoped that the new guidance document will provide that. Arizona is pursuing 179B demonstrations and is eager to see the guidance. Utah is working with their state petroleum association, which has contracted with Ramboll to explore a 179B demonstration. Utah thought the guidance would be helpful. Scott noted that a successful 179B demonstration essentially puts an area into a “limbo” state where there is no bump-up or RACT requirements. It was noted that it doesn’t seem appropriate that a nonattainment area would not have to implement RACT for those emissions that are within a state/local/tribal jurisdiction. Alaska said that the technical tools to analyze international transport would be useful for Alaska’s work, although Alaska is not in need of 179B guidance.

13. The Regional Haze session featured several presentations. Ryan Templeton (AZ) presented on the WRAP’s [Technical Support work](#). Amber Potts (WY) and Jay Baker (UT) presented the WRAP Regional Haze Planning Workgroup’s progress in a presentation on [Regional Haze Planning work](#). Mike Morris (WY) demonstrated the Regional Haze in the West storyboard. Scott Mathias (EPA OAQPS) presented a summary of [EPA RH guidance](#). Chet Wayland (EPA OAQPS) presented EPA’s regional haze [national modeling work](#). Chet was asked about the years for Canada and Mexico emissions, the Canadian emissions are 2015 and the Mexico emissions are 2008. Chet and Scott were asked how to work with EPA on potential emissions reductions; both said it is important to involve the regional offices in these discussions. There was concern from states about adjustment of the glidepath and adjustments could require a state to go back and re-analyze required emissions reductions. States also had concerns about how to review proposed adjustments to the glidepath prior to SIP submittal to ensure there is agreement. Chet and Scott were asked what happens if a state chooses not to adjust the glidepath for some or all of its Class I areas. Both said there is an option to adjust the glidepath in a subsequent planning period.

The Regional Haze Roundtable asked the following questions:

- Has the timing of EPA’s guidance and/or modeling results caused any planning or technical issues that the WRAP or members can assist with? For example, is your state considering adjusting your glidepaths based on EPA’s modeling? If so, would you be interested in a collective, western states approach to adjust all glidepaths?
- What potential consultation or coordination issues does your agency anticipate as the planning process continues? If so, do you see a role for WRAP in resolving these issues?

Responses:

Hawaii: Hawaii has monthly calls with EPA. Hawaii used the WRAP Q/D screening tool to identify 7 facilities to perform 4-factor analyses. Would like to see collective, western approach to adjust all glidepaths.

Nez Perce Tribe: Coordinating with Idaho already.

Arizona: Arizona held a stakeholder meeting on 8/18/19 and EPA’s guidance was released 8/20/19. Arizona prefers pursuing a unified approach to glidepath adjustment. WESTAR/WRAP could revise the contacts list regularly to assist in consultation and coordination.

Nevada: Figured out that the guidance was ok. Nevada would like a unified approach to glidepath adjustment. Nevada requests WRAP assistance with consultation and coordination.

Utah: Prefers a unified approach to glidepath adjustment. Utah has no technical issues with the EPA RH guidance. Utah plans to stick with the consultation/coordination process.

Washington: has no additional needs.

Montana: wants to learn more about international adjustment to the glidepath.

Wyoming: is currently in the process of reaching out to sources. Wyoming is interested in glidepath adjustment.

North Dakota: interested in working together to adjust glidepaths.

Idaho: prefers that glidepaths are adjusted consistently across the west. Idaho will continue to work with WRAP on coordination and consultation.

Oregon: in discussion about Q/D for source identification; additional data would be good. Oregon asks that EPA work to reduce international emissions contributing to haze in the west.

Colorado: Has no problems with EPA RH guidance. Colorado has made no decision on adjusting glidepaths. Colorado has requested 4-factor analyses from identified sources.

Alaska: thought the RH guidance was helpful. Alaska has questions about consistency in analyzing glidepath adjustment.

14. The final session covered wildfire smoke analysis tools available at the state and federal levels. Dr. Matt Kadlec (WA ECY) presented on Washington's [Smoke from Fires Toolkit](#). Matt was asked whether Washington's wildfire smoke workgroup will continue; Matt said that it will continue and incorporate new science and data. Pete Lahm presented [Efforts to Build an Interagency Smoke-Ready Communities Program](#). Erika Sasser presented information about the [EPA Smoke-Ready Toolbox for Wildfires](#). Erika was asked about improvements to NOWCAST for smoke episodes. EPA continues engagement to try to improve NOWCAST for wildfire smoke events. There is a need for consistency in weather/air quality apps so that the message is consistent. The National Weather Service can push out messages effectively, but not all apps link to their messages.
15. The meeting adjourned at 5:10 pm on November 6, 2019.

MEETING PARTICIPANTS

WESTAR/WRAP Members:

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Theresa Alexander, BLM

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