

-- D R A F T¹ --
June 8, 2016
WESTAR Council Meeting
Conference Call Summary

The monthly WESTAR Council call began at 1:00 pm PDT/2:00 pm MDT/3:00 pm CDT. Council members and delegates present included:

Clint Bowman (WA),
Dave Collier (OR)
Tina Suarez-Murias (CA),
Dave Klemp (MT),
Brian Gustafson (SD),
Mary Anderson (ID),
Danilo Dragoni (NV),
Terry O'Clair (ND),
Richard Goodyear (NM),
Will Allison (CO)

WESTAR staff present: Mary Uhl, Bob Lebens, Tom Moore

Agenda topics:

Agenda Items:

1. Summary of Denver RH NPRM public hearing and WESTAR issues for written WESTAR comments on RH NPRM (WESTAR RH workgroup)
2. WESTAR/WRAP Fall meeting topics-prioritize top 3 topics per state (all Council members, see attached)
3. WESTAR/EPA Exceptional Events Implementation Technical Conference (Bob Lebens)
4. AZ DEQ seeks an AQ Deputy Director (Tim Franquist, see attached)
5. EPA response to WESTAR Background Ozone Comments (Mary Uhl)
6. CAAAC appointment and application for CASAC appointment (Mary Uhl)
6. Other items as time and interest permit

Call Summary:

¹ Draft will be considered final upon review and approval by a majority of the members, typically on the next monthly conference call.

1. RH NPRM and drafting of WESTAR comments on RH NPRM
Tina Suarez-Murias presented the key issues. 12 WESTAR states have been active in the drafting of the WESTAR comments:
 - a. Support for 3 year extension;
 - b. Support for removing SIP requirements for periodic reviews;
 - c. RAVI-has only been invoked 4 times in history; could propose that RAVI is eliminated because RH rule does the same thing as RAVI or could propose: improvements to certification and response time to a RAVI certification, whether to require RACT, tighten timeline for RAVI-control implementation. Agree with EPA that RAVI become incorporated into state's next RH SIP. We will proceed to suggest improvements to the RAVI proposal.
 - d. Consultation-what types of consultation should occur and what should the timing be?
 - e. Recommendation to reassess baseline for most-impaired-would require a lot of work, may not be necessary to reanalyze glide slope. Setting goals and using 4-factor analysis will be in guidance.
 - f. EPA still hoping for 2-week overlap in guidance; EPA may extend rule comment deadline. We will make the point about needing to see the guidance.
 - g. WESTAR had asked for visibility impairment one of 4 factors; EPA didn't propose this.
 - h. Section 309-will WESTAR support 309 state comments? Yes. SO2 annex remains part of the SIP. Source emissions in the annex could be grandfathered forever, double-checking this. Concern about how to handle SMP.
 - i. Ensure definitions throughout the rule are consistent.
 - j. Funding-estimate from OMB, comments were due June 3. Looks low. WESTAR could comment on the true cost of RH SIP development.
 - k. Reflect improvements in visibility that have been achieved. 65% of 80 western monitors have visual range greater than 100 miles; improvements in the west are much greater than in the rest of the country.
Comments/questions: Concerns about FLMs ability to usurp state role in identification of source(s) contributing to RAVI; what is the best approach? We value FLM input and consultation.
2. WESTAR/WRAP Fall meeting topics
Top state priorities are for the OAQPS update, ozone, smoke management, exceptional events and regional haze.
3. WESTAR/EPA Exceptional Events Implementation Technical Conference
Bob Lebens discussed a WESTAR specialty workshop collaborating with EPA to discuss the EE rule and guidance, especially wildfire. Provide opportunity for states to sit down and roll up their sleeves on implementation. EPA plans to host a shorter meeting in the west and Midwest. WESTAR has begun discussions with

EPA about planning this conference; good interest from states and FLMs.
Conference might be in October/November timeframe possibly in San Francisco.

4. AZ DEQ seeks AQ Deputy Director

5. EPA response to WESTAR Background Ozone Comments-a conference call with the WESTAR background ozone workgroup and EPA has been proposed.

6. CAAAC appointment for Mary Uhl; Tom Moore applied for CASAC appointment

7. Other items

The meeting adjourned at 1:50 pm PDT/2:50 pm MDT/3:50 pm CDT.