Appendix 4-1: Summary of Consultation Calls

Notes from the July 11, 2007, Consultation Conference Call Convened by the Texas Commission on Environmental Quality (TCEQ) Staff to Consult about Regional Haze Affecting Big Bend and Guadalupe Mountains National Parks

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Participants:

States:
Louisiana Department of Environmental Quality (LDEQ) – James Orgeron, Vivian Aucoin
Oklahoma Department of Environmental Quality (DEQ) – Eddie Terrill-Division Director, Lee Warden
Arkansas Department of Environmental Quality (ADEQ) – Kelly Jobe
Kansas Department of Health and Environment (KDHE) – Tom Gross, Andy Hawkins, Erika Stanley
New Mexico Environment Dept (NMED) – no representatives
Texas Commission on Environmental Quality (TCEQ) – Dr. Jim Price, Keith Mars, Jocelyn Mellberg, Dr, David Halliday, Dave Harper, Dave Westenbarger
Federal Land Managers (FLMs) and U.S. Environmental Protection Agency (EPA):
FLM – Mike George – National Park Service (NPS)
FLM – Bruce Polkowsky – NPS
FLM – Chuck Sams – U.S. Forest Service (FS)
EPA – Joe Kordzi – EPA Region 6
FLM – Meredith Bond – U.S. Fish and Wildlife Service (FWS)
FLM – Tim Allen – FWS
FLM – Judy Logan – U.S. Forest Service
FLM – Anne Mebane – U.S. Forest Service
Tribal Representatives: None on the call
Central Regional Air Planning Association (CENRAP): Jeff Peltola – Technical Director

Additional persons listening to the call

Christine Otto – Trinity Consultants
Bob Oliphant – Luminant (formerly Texas Utilities)
Ramon Alvarez – Environmental Defense
Bob Paine – ENSR
Dean Metcalf – EXEL
Bruce Davis – DuPont Engineering
– URS

TCEQ: Dr. Jim Price gave an overview of the plans that the Texas Commission on Environmental Quality (TCEQ) staff has for the regional haze consultation process. It includes two more scheduled conference calls on July 18 and July 31, 2007.

The staff had notified the entire State Implementation Plan (SIP) and Best Available Retrofit Technology (BART) list serve e-mail lists of the calls. Some states are only including other states, tribes, federal land managers (FLMs), and EPA in the consultation process. The TCEQ decided to open up the consultation for all other stakeholders to listen in. The active discussion process is for states, tribes, federal land managers, and EPA. In the call announcement the staff asked the other stakeholders to submit questions and comments by e-mail. Since there was time at the end of this call, the staff invited questions comments from the other stakeholders.

TCEQ: Jim described the papers that Keith Mars sent out to the list of states, tribes, FLMs, EPA, and stakeholders who had replied to the e-mail to the SIP and BART list serves. He gave Keith

Mars' contact information for anyone who had not yet received the papers. The documents sent out were:

1. Texas' Regional Haze State Implementation Plan, Summary of Major Issues
2. June 2007 Draft: Dust Storms as Natural Events for Regional Haze and Particulate Matter in West Texas
3. June 2007 Draft: Estimating Natural Conditions Based on the Revised IMPROVE Algorithm
4. Technical Paper: Uniform Rates of Progress and the Projected 2018 Reasonable Progress Goals
5. June 2007 Draft: Integrated Planning Model (IPM) Projections of Electric Generating Unit Emissions for the Regional Haze State Implementation Plan
6. Projections to 2018 for the best 20 percent of days showing whether the non-degradation requirement is met. These projections calculate coarse mass and fine soil as not changing from the base period to 2018. [GlidePath_CM&SOIL=1_ CEN+_B20_PSAT2018vs2002_unit=Deciview_nia.xls]
7. Projections to 2018 for the worst 20 percent of days showing both default and Texas estimates of natural conditions. Coarse mass and fine soil are treated as natural and projected not to change from the base period to 2018. The file extension needs to be changed to zip after the file arrives attached to an e-mail. [task1.W20_2.zzz]

Summary of Major Issues

TCEQ: Jim Price went through the issues raised in the summary paper with emphasis on the places the TCEQ staff proposals differ from the EPA-National Park Service (NPS) default methodology.

Described Dr. David Halliday's paper on Estimates of Natural Conditions. We said that we are planning to use site-specific estimates of natural conditions. We had Environ prepare the glide paths for Texas and for the sites that we may be asked to consult about. Since Environ is using a macro to produce them, we decided to have them do so for the entire set of CENRAP modeling receptor sites. We are not suggesting that any other state should adopt an alternative natural condition estimate. We are just providing them in case others might be interested.

FLM: Tim Allen suggested that the site-specific natural condition estimates be used on a supplemental basis. One of the FLMs questioned the estimate for organic carbon.

TCEQ: Jim Price invited and welcomed comment on the natural condition estimates for all components of particulate matter (PM). He said, however, that the staff proposal to management will be to use the site-specific natural condition estimates and that the EPA default estimates would go in the appendix.

TCEQ: Described Stuart Dattner's dust storm paper. At Guadalupe Mountains, natural dust storms in the Chihuahuan desert dominate the worst 20 percent (W20%) days. Staff thinks that the situation for dust (coarse mass (CM) and fine soil (FS)) is much the same at Big Bend, although the impact is less intense. Staff noted that there is little human activity in the Big Bend and Guadalupe Mountains regions.

Discussed the conclusion that the dust affecting Big Bend and Guadalupe Mountains is overwhelmingly natural. The TCEQ's choice is to project 2018 visibility assuming that CM and FS are natural and will remain the same. The agency had Environ prepare glide slopes using both the default and the staff-derived estimates of natural conditions.

Described the U.S. anthropogenic only plots that the agency is having Environ prepare. They were still in QA review at the time of the call.

Described controls that Texas already has in place:

- CAIR for both SO_2 and NO_X
- Texas' ozone SIPs for NO_X, including the new one that requires NO_X reductions from hundreds of natural gas compressor engines in many counties.
- The EPA refinery consent decree requiring substantial SO_2 reductions from refineries and a large sulfuric acid plant in the Houston area.
- BART rules for which we don't yet know the full impact, but one refinery that is subject to both BART and the refinery consent decree reportedly had a maximum impact of 5 deciviews at one Class I site outside Texas. Described Refinery/BART analysis for that source. The company states that its controls will reduce the impact from 5.0 deciview (dv) to 0.5 dv. Staff expects that this will be the largest impact reduction from a BART source in the state.
- BACT on all new and modified facilities for SO_2, particulate matter (PM), and NO_X. It has been a requirement for 35 years.
- Opacity limits for PM that have been in place for over 35 years.

TCEQ: Described IPM projections vs. Clean Air Interstate Rule (CAIR) Caps. The TCEQ staff thinks that IPM is very likely to turn out to be conservative (i.e., an overestimate) of emissions compared to CAIR Caps. Noted that the CENRAP 2018 particulate matter source apportionment technology (PSAT) modeling used the IPM estimates plus permitted sources for an SO_2 estimate of approximately 350,000 tons per year. The 2015 CAIR cap is approximately 225,000 tons per year.

TCEQ: Mentioned that some additional controls have been presented for management consideration, but that, if they were adopted, the impact would be small compared to the reductions from CAIR, the Texas ozone SIPs, the EPA refinery consent decree, plus BART. The difference in impact would be difficult or impossible to see on a graph projecting 2018 visibility impairment. Correct version of uniform rate of progress (URP) and projected reasonable progress paper is the one with the 07-05 date (July 5, 2007). We invited states to consult if their impact on one of our Class I areas was $\geq$ 0.5 inverse megameter.

The last subsection (i) in Section 308 states the requirements for continuing consultation with the FLMs (July 1, 1999, FR p. 35769).

FLM: Bruce Polkowsky has sent his draft description of what he thinks would be adequate to one Regional Air Program, I think it is MANE-VU, for comment. He wants to get the response before he distributes his draft further. He hopes to send it around before the CENRAP POG meeting.

TCEQ: Jim asked if just the Interagency Monitoring of Protected Visual Environments (IMPROVE) monitors would be sufficient to track progress.

FLM: Bruce said that he thought they would be sufficient and hopes that they continue to be funded.

TCEQ: Jim described how we decided to invite states to consult using the PSAT results and including states with $\geq$ 0.5 inverse megameter impact on one of Texas' Class I areas. Kansas' impact is greater than Louisiana's impact in the modeling, but Jim doesn't believe that's correct and Texas won't be asking Kansas for additional controls.

FLM: Tim Allen asked how he should provide feedback. How formal will the process be?

TCEQ: We anticipate the second and third consultation meetings will have more of a two-way conversation. Staff would also appreciate written comments. As a reminder, this consultation process is not in lieu of the formal notice and comment period for federal land managers to provide comments.

Environmental Defense: Ramon Alvarez asked how he can get the documents. Jim Price told him that Keith would add him to the e-mail list.

FLM: Tim Allen suggested that we ask New Mexico about its energy development plans and a dust study at Salt Creek. Tim Allen confirmed that the emissions would be mainly NO_x.

TCEQ: Jim Price responded that we would look at both but that the PSAT modeling indicates that New Mexico has surprisingly little impact on even Guadalupe Mountains.

To try to do before the next call:

- Send out a link to the PSAT tool on the CENRAP web site.
- Resend the large documents after converting them to PDF so that they will get past the NPS 10 megabyte e-mail filter.
- Send out the U.S. anthropogenic only extinction glide slopes.

E-mail sent July 18, 2007 by the TCEQ Staff to Consult about Regional Haze Affecting Big Bend and Guadalupe Mountains National Parks

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From: Keith Mars
To: agarza@kickapootraditionaltribeoftexas.com; aheim@omtribe.org; Alvarez, Ramon; amebane@fs.fed.us; amuller@potawatomi.org; apuglisi@sandiapueblo.nsn.us; asharp@censara.org; bbernacik@lagunatribe.org; berniewhitetree@yahoo.com; Bob.Oliphint@luminant.com; BPaine@ensr.aecom.com; bross@unitedkeetoowahband.org; Bruce.C.Davis@USA.dupont.com; bruce_polkowsky@nps.gov; carlagonzales933@msn.com; cbullock@actribe.org; ccreson@wyandotte-nation.org; cltecube@yahoo.com; cnoep@yahoo.com; COtto@trinityconsultants.com; csams@fs.fed.us; cwlujan@yahoo.com; dalemayehu@kawnation.com; ddaniels@osagetribe.org; dgoss@santaana.org; dhartzell@iowanation.org; dinoc@santaclarpueblo.org; douglas_mickey@sbcglobal.net; dparton@c-a-tribes.org; dsgoombi@yahoo.com; dshields@kickapootribeofoklahoma.com; epa@caddonation-nsn.gov; eschroeder@gmail.com; gmoore@mcnoes.org; hlharjo@yahoo.com; jacob_pecos@pueblodecochiti.org; james.orgeron@la.gov; j-davis65@sbcglobal.net; jdixon@peoriatribe.com; jeff_peltola@yahoo.com; Jesus.J.Reynoso@elpasotexas.gov; jhale@cherokee.org; jlogan@fs.fed.us; jmontoya@puebloftesuque.org; JOBE@adeq.state.ar.us; Jones, James D.; jpeltola@censara.org; jsandy@sfpueblo.com; jstreib@sacandfoxnation-nsn.gov; jwaffle@tonkawatribe.com; klovato@sdutilities.com; kordzi.joe@epa.gov; l_hight@wichita.nsn.us; lcortez@ydsp-nsn.gov; Lindsay.Little@nrgenergy.com; lstrangejbc@centurytel.net; mac@adeq.state.ar.us; mack.peterson@chickasaw.net; mars37716@yahoo.com; mduran@puebloofpojoaque.org; melissarobinson@choctawnation.com; melveston@coushattatribela.org; meredith_bond@fws.gov; michael_george@nps.gov; mmatlock@pawneenation.org; modoc-OEQ@cableone.net; mrutledge@miamination.com; ndndonna@yahoo.com; njohn@cherokee.org; nweber@sanipueblo.org; nyocrumm@delawarenation.com; Pat.Sullivan@deq.state.ok.us; pbarton@sctribe.com; pbelmonte@ensr.aecom.com; poi36801@isletapueblo.com; poncaearthguy@yahoo.com; Price, Jim

Date: 7/18/2007 8:50:18 AM
Subject: minutes from 7/11/2007 Texas regional haze meeting

All,
Attached are the minutes from the July 11, 2007, Texas regional haze consultation call. Please let me know about errors in spelling and affiliation as well as for names of persons we didn't get down. It would be helpful to receive suggested changes and additions to the notes by the end of this week. Thank you.

As a reminder: The Texas Commission on Environmental Quality (TCEQ) has scheduled three consultation meetings.
July 11, 2:30 p.m. - 4:00 p.m. c.s.t
July 18, 10:00 a.m. - 11:30 a.m.
July 31, 10:00 a.m. - 11:30 a.m

CENRAP will be hosting the meetings. The call in phone number is 1-800-504-4496 and the passcode is 5614946#.

Thank you for your participation,

Keith Mars
Air Quality Planning Section
Texas Commission on Environmental Quality
Phone: (512) 239-5936
E-mail: kmars@tceq.state.texas.us

CC: Earnest, Margaret; Mellberg, Jocelyn; Nudd, Greg; Price, Jim

D R A F T

July 18, 2007

Notes from the July 18, 2007, Consultation Conference Call Convened by the TCEQ Staff to Consult about Regional Haze Affecting Big Bend and Guadalupe Mountains National Parks

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Participants:

States:
Oklahoma Department of Environmental Quality (DEQ) – Lee Warden, Jacob Petre
Kansas Department of Health and Environment (KDHE) – Andy Hawkins
New Mexico Environment Dept (NMED) – Rita Trujillo
Texas, TCEQ – Dr. Jim Price, Keith Mars, Jocelyn Mellberg, Dr. David Halliday, Dave Harper, Greg Nudd, John Minter
Federal Land Managers (FLM) and EPA:
FLM – Bruce Polkowsky – NPS
FLM – Chuck Sams – U.S. Forest Service (FS)
FLM – Mike George – NPS
FLM – Bret Schichtel – NPS
FLM – Tim Allen – FWS
FLM – Judy Logan – FS
FLM – Ann Mebane – FS
FLM – Scott Copeland – FS
Tribal Representatives: None on the call
CENRAP: Jeff Peltola – Technical Director

Additional persons listening to the call

Christine Otto – Trinity Consultants
Bob Oliphint – Luminant (formerly Texas Utilities)
Dean Metcalf – EXEL
Steve Ramsey – Environ
Andrea Field, Attorney – UARG
N. N. Dharmarajan "Dharma" – AEP
Dave Heinold – ENSR

TCEQ: Dr. Jim Price gave a brief review of the last call. He gave an overview of the plans that the Texas Commission on Environmental Quality (TCEQ) staff has for the regional haze consultation process. It includes one more scheduled conference call on July 31, 2007.

Jim reviewed the documents that have been sent to participants in the consultation process.

1. Texas' Regional Haze State Implementation Plan, Summary of Major Issues
2. June 2007 Draft: Dust Storms as Natural Events for Regional Haze and Particulate Matter in West Texas
3. June 2007 Draft: Estimating Natural Conditions Based on the Revised IMPROVE Algorithm
4. Technical Paper: Uniform Rates of Progress and the Projected 2018 Reasonable Progress Goals
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not changing from the base period to 2018. [GlidePath_CM&SOIL=1_ CEN+_B20_PSAT2018vs2002_unit=Deciview_nia.xls]
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Summary of Major Issues

TCEQ: Dr. Jim Price briefly described the issues raised in the summary paper with emphasis on the places the TCEQ staff proposals differ from the EPA-National Park Service (NPS) default methodology.

TCEQ: Jim described Dr. David Halliday's paper on Estimates of Natural Conditions. We said that we are planning to use site-specific estimates of natural conditions. TCEQ invited comment on David's paper. TCEQ would specifically like input on how we are treating each component. Jim said, however, that the staff proposal to management will be to use the site-specific natural condition estimates and that the EPA default estimates would go in the appendix.

TCEQ: Described Stuart Dattner's dust storm paper. At Guadalupe Mountains natural dust storms in the Chihuahuan desert dominate the worst 20 percent (W20%) days. Staff thinks that the situation for dust (coarse mass (CM) and fine soil (FS)) is much the same at Big Bend, although the impact is less intense. Staff noted that there is little human activity in the Big Bend and Guadalupe Mountains regions.

Discussed the conclusion that the dust affecting Big Bend and Guadalupe Mountains is overwhelmingly natural and the choice to project 2018 visibility assuming that CM and FS are natural and will remain the same. The agency had Environ prepare glide slopes using both the default and the staff-derived estimates of natural conditions. Described the U.S. anthropogenic only plots that the agency is having Environ prepare. They were still in QA review at the time of the call.

TCEQ: Described controls that Texas already has in place:

- CAIR for both SO_2 and $NO_{X.}$
- Texas is the most westward state that is subject to CAIR. TEXAS brought in to CAIR by PM2.5 impacts in Illinois. TEXAS legislature required TEXAS to adopt CAIR as written.
- Texas' ozone SIPs for NO_X, including the new one that requires NO_X reductions from hundreds of natural gas compressor engines in many counties.
- The EPA refinery consent decree requiring substantial SO_2 reductions from refineries and a large sulfuric acid plant in the Houston area.
- BART rules for which we don't yet know the full impact, but one refinery that is subject to both BART and the refinery consent decree reportedly had a maximum impact of 5 deciviews at one Class I site outside Texas. Described Refinery/BART analysis for that source. The company states that its controls will reduce the impact from 5.0 dv to 0.5 dv. Staff expects that this will be the largest impact reduction from a BART source in the state.
- BACT on all new and modified facilities for SO_2, particulate matter (PM), and NO_X. It has been a requirement for 35 years.
- Opacity limits for PM that have been in place for over 35 years.

TCEQ: Described IPM projections vs. CAIR Caps. The TCEQ staff thinks that IPM is very likely to turn out to be conservative (i.e., an overestimate) of emissions compared to CAIR Caps. TCEQ noted that the CENRAP 2018 particulate matter source apportionment technology (PSAT) modeling used the IPM estimates plus permitted sources for an SO_2 estimate of approximately 350,000 tons per year. Lee Warden incorporated TCEQ's new permit information to the EGU modeling inventory to arrive at the 350,000 tpy emission rate. The 2015 CAIR cap is approximately 225,000 tons per year.

TCEQ: Greg stated that additional controls on Texas sources will not be included in this first Regional Haze SIP beyond CAIR, BART, and the refinery consent decree. The sulfur reductions for Base G with the consent decree are significant, and estimated to be approximately 45,000 tpy. The PSAT analyses indicate the sulfur controls will give the most significant benefit to visibility. Informal conversations with Texas utilities have indicated that Texas utilities will not be buying credits outside of their systems or across state lines. We have a permit application in house to significantly reduce SOx emissions at Rhodia in Harris County. The current emission rate is approximately 10,000 tpy of SO2. The new controls are expected to give approximately 90% reduction. These Rhodia reductions have not yet been included in any model runs.

Open discussion
Discussed David's paper and his approach.

FLMs: Scott Copeland and Bret Schichtel provided feedback. They find the new approach troublesome. FLMs are unclear as to what Texas' approach will be for the SIP. How do the dust storm and the Natural Conditions papers relate to what will be proposed in the SIP? FLMs will follow up with David with comments.

FLMs are interested in no degradation on the best days. PSAT analyses are showing that projections to future only show no degradation to the best 20% days. FLMs are interested in the communication process that will follow the submittal of the SIP. How will states continue to ensure that progress is being made?

TCEQ: Texas is interested in the information that Bruce Polkowski has compiled on how the process will work.

FLM: Even if benefits are small, Tim Allen said that more controls would be worth it. Someone talked about states reaching out to EGUs to help improve IPM results.

TCEQ: Greg responded that Texas has been actively involved in communications with utilities to determine future energy growth and emissions.

FLM: Tim Allen mentioned the prevention of significant deterioration (PSD) issue of informing FLMs at 300 km away from a new source.

TCEQ: Jim mentioned that a Q/D approach to notification might be of use. Greg indicated that he had been involved in discussions with PSD staff and will continue to participate in those discussions.

Texas fully intends to still give FLM their 60 day review, but would like to address as many of the FLMs concerns as early as possible and before going to proposal. Texas asked for feedback via email or phone call.

Texas intends to review the analyses that have been performed at Salt Creek Wilderness Area, NM. Texas sites are not impacted by New Mexico, but there is plenty of similarity in terrain and the analyses may be of value in understanding visibility at Texas' sites.

The Big Bend Regional Aerosol and Visibility Observational (BRAVO) study showed greater contribution from the continental U.S. and Texas at Big Bend than the CENRAP modeling shows. Therefore, Texas is optimistic that CAIR will produce more visibility benefits than the current modeling analyses are showing.

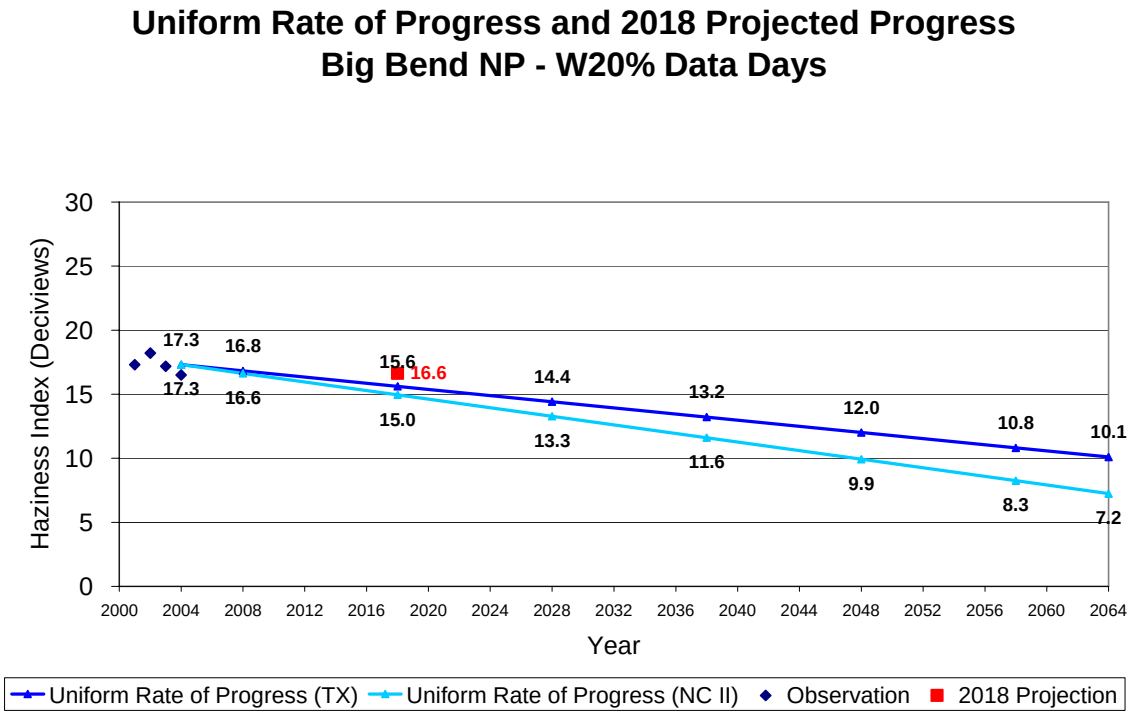
Jim mentioned all the hard work that Lee had done as co-chair of the CENRAP modeling workgroup. Lee is awesome and we miss her.

Material for the July 31, 2007, 10:00 a.m. – 11:30 a.m. Consultation Conference Call on
Big Bend and Guadalupe Mountains National Parks in Texas,
Texas Commission on Environmental Quality (TCEQ)

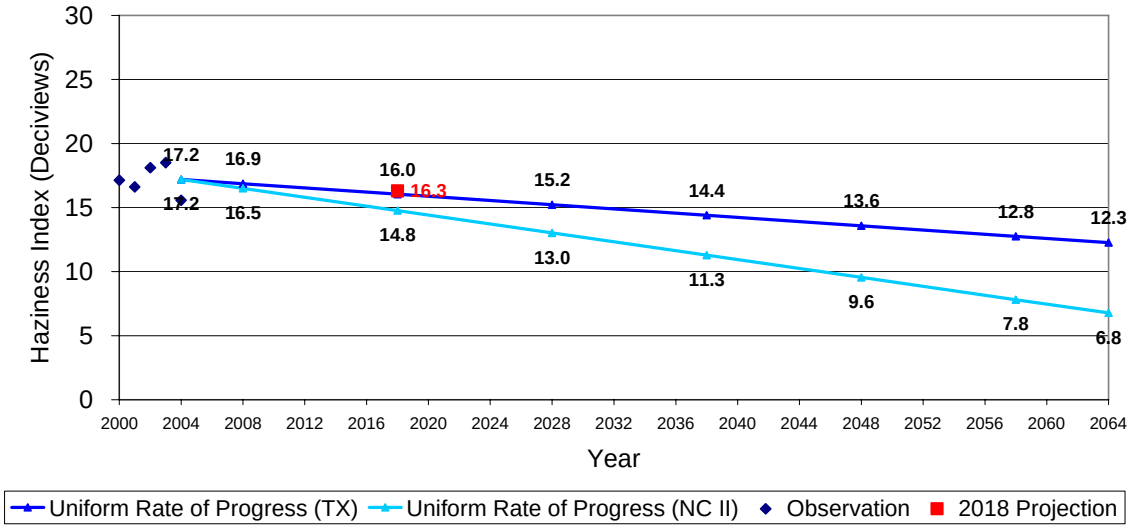
The two graphs that follow show the uniform rate of progress (URP or glide path) lines for each park calculated by two different methods. The upper line uses Class I area specific estimates of natural conditions for 2064. To select the worst 20 percent days for 2064 we first presume that the anthropogenic impacts end by 2064. This leaves worst 20 percent days that have higher dust impacts than the base period worst 20 percent days. One of the technical discussions that we have distributed documents the large impact of natural blowing dust conditions in West Texas. This technical paper is now on our web site at http://www.tceq.state.texas.us/implementation/air/sip/bart/haze_sip.html. Because of these considerations, we are using the approximation that coarse mass and fine soil at the two West Texas Class I areas are natural for the worst 20 percent days. For the other $PM_{2.5}$ components, we have used the Natural Conditions II estimates, although there is substantial uncertainty about the natural portion of organic carbon. We plan to revisit the natural condition estimates for the five-year review and the 2018 regional haze state implementation plan revision.

The lower URP line uses the Natural Conditions II estimates for all particulate matter components for 2064.

The 2018 reasonable progress goals (RPGs) use 2018 CENRAP modeling for all components except coarse mass and fine soil. For these two components we project average 20 percent worst day conditions as unchanged in 2018. The RPGs do include all on-the-books emission limitations including EPA's estimates of the SO_2 reductions from some of the EPA refinery consent decrees. The CAIR estimates are from the CENRAP modeling, which includes issued permits in addition to the Integrated Planning Model (IPM) 2.1.9 estimates. The CENRAP SO_2 estimate for electric generating units (EGU) in Texas is approximately 350,000 tons per year. The CAIR 2015 cap is approximately 225,000 tons per year for Texas.



Uniform Rate of Progress and 2018 Projected Progress
Guadalupe Mountains NP - W20% Data Days



Notes from the July 31, 2007, 3rd Consultation Conference Call Convened by the TCEQ Staff to Consult about Regional Haze Affecting Big Bend and Guadalupe Mountains National Parks

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Attendees

Bruce Polkowski – National Park Service (NPS) and Federal Land Manager (FLM)
Tim Allen, Meredith Bond – U.S. Fish and Wildlife Service (FWS) and FLM
Ann Mebane – U.S. Forest Service (FS) and FLM
Greg Nudd, David Halliday, Dave Harper, Keith Mars, Jocelyn Mellberg, John Minter, Jim Price, - Texas Commission on Environmental Quality (TCEQ)
Mark McCorkle – Arkansas Department of Environmental Quality (ADEQ)
Cheryl Bradley, Scott Thomas, Lee Warden, Jacob Petre – Oklahoma Department of Environmental Quality (DEQ)
Andy Hawkins – Kansas Department of Health and Environment (KDHE)
Rita Trujillo – New Mexico Environment Dept (NMED)
Jeff Peltola, Technical Director – Central Regional Air Planning Association (CENRAP)
Haley Summerford – Fort Worth, Texas

Additional persons listening to the call

Trinity Consultants
Dean Metcalf – Xcel Energy
Andrea Field, Attorney – UARG
Jimmy Jones – ALCOA
Bob Paine – ENSR
Nancy Garnett – TXI
N. N. Dharmarajan ("Dharma") – AEP

TCEQ: The TCEQ staff discussed all the points covered in the two pages of information sent out prior to the conference call.

EPA: The final 8-hour, Regional Haze and particulate matter modeling guidance documents are now available.

TCEQ: Ann Mebane has provided us a reference to a study available through the WRAP web site about dust at Class I areas including Big Bend and Guadalupe Mountains National Parks. The TCEQ will review it in preparing its regional haze SIP proposal. Sulfate (SO_4) is the largest contributor to visibility impairment at both national parks in Texas. Coarse mass and fine soil are not controllable by TCEQ.

Tim Allen, Federal Land Manager (FLM) comments: Want to see the uniform rate of progress using the Natural Conditions II (NCII) estimates to be in the TCEQ SIP.

TCEQ: The TCEQ will also show the CENRAP PSAT modeling results. The modeling under predicts both the Mexican and the U.S. influences. The TCEQ is currently examining a model performance evaluation by Environ. The Big Bend Regional Aerosol and Visibility Observational (BRAVO) study indicated that for SO_4, which has the largest visibility impact of all pollutants at Big Bend, 1/3 comes from Mexico, 1/3 from Texas, 1/3 from the Midwest and South beyond Texas. These results are somewhat inconsistent with CENRAP PSAT modeling results, which indicate that slightly more than half of the visibility impairment at Big Bend comes from Mexico and other areas outside the U.S.

Substantial SO_2 and NO_X reductions are expected from the Clean Air Interstate Rule (CAIR) upwind of Texas. The CENRAP PSAT modeling appears to underestimate the impact from these areas, the visibility improvement at Big Bend and Guadalupe Mountains National Parks may well improve more than the CENRAP modeling predicts.

Because the CENRAP modeling shows that over half of the anthropogenic visibility impairment at Big Bend in 2002 came from Mexico and other international sources of pollution, the improvement modeled for Texas' and other U.S. emission reductions shows limited visibility improvement at Big Bend. The Reasonable Progress Goal doesn't meet Uniform Rate of Progress. The draft SIP will ask specifically for EPA to initiate federal efforts to reduce the international impacts on visible pollution at Big Bend.

TCEQ: Requested the participants in the call e-mail their comments to Keith Mars and to identify any disagreements with the approaches Texas is taking.

Each state that has an impact on the two Class I areas in Texas has a relatively small amount of impact. New Mexico's modeled impact on Guadalupe Mountains National Park is 3% to 4% of the total. Due to the proximity of New Mexico to Guadalupe Mountains National Park, this impact is surprisingly small. TCEQ staff speculated that the prevailing south-to-north wind flow involved with Marfa dry line may account for the low impact.

The states (New Mexico, Oklahoma, Kansas, and Louisiana) that the modeling shows has an impact on Texas' two Class I areas appear to be on the path to adopt all controls that the state determines to be reasonable, so the TCEQ has made a preliminary determination that no further reduction is necessary beyond what each state is on the path to do.

The TCEQ staff asked whether the states had any questions or comments.

Rita Trujillo, New Mexico: New Mexico is not planning to revise natural conditions based on what Texas is doing. How will that be dealt with? New Mexico used Guadalupe Mountains National Park monitor data.

TCEQ: We have no problem with New Mexico's choice to use the NCII estimates of natural conditions for Carlsbad Caverns.

Joe Kordzi: EPA Region 6 wants all calculations shown.

The Midwest Regional Planning Organization shows differences with CENRAP modeling.

Tim Allen, FWS: FLMs are going to look to see if all states are consistently making progress, for example if New Mexico saw it right for large reductions, but Texas saw not then that might be a problem.

Bruce Polkowski, NPS: The same IMPROVE monitor for is used for Carlsbad and Guadalupe Mountains National Park. He discussed the decisions to have specific monitors provide substitute data for unmonitored Class I areas and the rationale for choosing the monitor. He noted that the modeling for coarse mass does not produce useful results and that the Western Regional Air Partnership (WRAP) has made a similar decision to keep coarse mass constant between the base case and the future case. There is nothing Texas can do to control coarse mass.

TCEQ: Additional materials will be available with the SIP. Stuart Dattner's dust paper on Guadalupe Mountains National Park was shared. TCEQ discussed the days dust cannot be controlled.

Summary of material on Guadalupe Mountains National Park:

- Natural Conditions II show both lines
- Rationale and good process, straight forward
- NCII in appendix in more detail
- Both estimates are in SIP
- Best estimate will be in the body of the SIP

FLM: How is the NC calculated? Who has reviewed the NC calculation? This is more important than where it is in the SIP. The FLMs would like to look at before the 60-day clock and before the SIP goes to proposal.

Oklahoma DEQ: Oklahoma is ready to consult on Wichita Mountains. There will be further consultation with tribes and then the consultation with states. Lee Warden said state consultations would start on August 16, 2007. Oklahoma comments: New sources and Class I areas, 100 km and greater, in any new source review (NSR) go beyond and to at least 300 km, impact change of 5% in extinction beyond 50 km, Oklahoma would like to comment on Texas BACT analyses. Lee Warden asked how to address the letter and who to send the comment officially.

TCEQ: TCEQ staff replied that it would be most effective from Executive Director to Executive Director.

Cheryl Bradley, OK DEQ: Question regarding the timing of the letter to be sent out on the prevention of significant deterioration (PSD) process.

TCEQ: Greg Nudd is working with TCEQ permits and NSR staff. Letters from FLMs and Oklahoma would be considered in the discussions.

ODEQ: An Oklahoma DEQ letter will be sent to Texas to use as model for close of Texas consultation process.

TCEQ asked for formal and informal comments from the Department of Interior.

FLM: Forest Service will send a similar letter.

TCEQ: Greg suggested that letter from Oklahoma's Executive Director will add more weight and more support to bolster conversations with TCEQ permits division. No degradation with PSD permits on best 20% visibility days.

How will no degradation be implemented in PSD? This will depend on how TCEQ interprets the new PSD regulations. How will TCEQ relate Regional Haze to PSD? A letter sharing the FLMs opinion on PSD and regional haze will help TCEQ in understanding the FLMs position.

ODEQ: Oklahoma will also send a letter from Oklahoma's Executive Director to TCEQ's Executive Director and copy Greg Nudd. Beverly will send to Cheryl Bradley, Bruce Polkowsky, and Ann Mebane.

Mark McCorkle, Arkansas: States that were below thresholds to consult as a state affecting us were not included in our consultation process.

There were no tribal comments or further state comments, and there was time left on the conference call line, so the TCEQ staff invited other interested parties to ask questions or comment if they wished.

Stakeholders

Haley, Ft. Worth: How will this affect the Dallas-Fort Worth (DFW) SIP?

TCEQ: TCEQ will be including DFW rules into Regional Haze SIP. Regional Haze doesn't involve conformity, so this SIP won't affect transportation emission budgets.

Bob Payne: Are there alternative glide paths? Are there glide paths for non-U.S. contributors?

TCEQ, Jim Price: TCEQ is still working on those. The natural conditions in 2064 are our best estimate of natural conditions without impacts from international transport. The reasonable progress goal (RPG) we are showing for 2018 assumes no change in international transport at that time since EPA requires that we include all influences on visibility in making the RPG projection.

Boundary conditions (BC) and Mexican emissions were projected forward with no change. But, there are emissions beyond the control of Texas. We are still working on U.S. anthropogenic only glide paths with TCEQ contractor.

Is there a map available with sources, relative size compared to location of Class I areas? Is there a large NOx and SO_2 sources map? Is there a map of these relative to Big Bend and Guadalupe Mountains National Park? Turning data into a map is not a trivial exercise. Will look into what is available. (We might want to refer question to WRAP's Technical Support System (TSS). David Halliday investigated and it can generate graphics.)

Are there back trajectories to Mexican sources? The emissions inventory is not reliable for Mexico.

CENRAP: University of California at Riverside (UCR) has lots of maps and modeling results. Many of the maps presented on the UCR web site present the changes in emission inventories. Since there have been many iterations in the different parts of the emission inventories, these kinds of plots are very useful to the person doing the emissions processing, but may not be as valuable to the general public. There are many plots to dig through in order to find maps that you may be interested in.

According to the CENRAP emissions inventory and modeling workgroups, modeling inventory and emissions inventory (EI) summaries being prepared by Pechan should be wrapped up by the end of the week. The summaries being prepared by the contractor should make reviewing the modeling EI relatively simple. Lee or Jeff, are there EGU/non-EGU maps available?

CENRAP: Lee will look for and send if she can find:

- 3 areas of Texas
- Key maps to distribute
- PSAT run maps

Jeff Peltola: Offered to put any needed documents on the CENRAP site.

Reran EGU/NEGU splits - instead of Low-level/Elevated for PSAT. New results in EGU document that Dave Harper prepared.

TCEQ: Anything else? Thanks for joining us.

Please send any lists of questions or issues for agreement or non-agreement.