Summary Minutes of conversation with the State of CO on Exceptional Events Demonstrations
February 24, 2015

Background: The state of Colorado has about 8 staff from various Air Pollution Control Division programs~~q divisions~~ working on EE submissions. We circulated questions to each for answers and consolidated responses.

Issues:

- Flagging Related:
  - Level of documentation needed; recently streamlined PM10~~2.5~~ demos into one package due to SIP required deadlines
  - No outlying events: for example sometime ~~an~~ event(s) happen(s) close to when we are about to submit a designation recommendation, etc. and it affects our recommendation (regulatory event) without any recourse ~~for~~for the state ~~us~~. The state is put in a position of submitting documentation under extremely tight deadlines or risk a nonattainment designation.
  - **Recommendation**: In rule, specify that events that occur 180 days or (some appropriate time) before a SIP deadline will be considered only in next cycle. This gives time for state/EPA to work on it separate from the SIP and planning issue.
- Events below the NAAQS:
  - Even though this Is not an issue for PM in general, EPA needs to revisit its policy on flagging and demonstration for values below NAAQS for SIP planning (DV calculations) and other regulatory requirements for Ozone.
- EPA Development of Technical basis:
  - EPA develops a separate TSD for every event after state has performed and developed a tremendous amount of analysis and documentation; this seems like a great example of wasted resources and inefficiency.
  - **Recommendation**: get to a place where the states does the work based on clear principles/guidance and EPA needs to do a very short notice/letter of concurrence.

What works well for us?

- Periodic evaluation of results from lab for PM, informal meetings, leads to gathering information and saving media, identification of local dust control measures;
- Group includes meteorologists, and the planning and data groups;
- Ozone reviews happen on an annual basis, including an evaluation of any potential events and causes;
- A best practice would be to track better with issues related to PM10 and connecting to DV implications.

Letter of Intent (informing regions of plans):

- We don't use the LOI regularly
- A few years back we revamped our checklists for deciding on events and we repeatedly use them as they seem~~s~~ to have worked

- Region 8 is also informed of what's in the works, informally but the region also keeps close track of data and sometimes initiates the contact about data anomalies
- Recent example: we learned that we track data separately and have different data and concerns – need to align our data tracking for better coordination.
- We use multiple tools – HYSPLIT. MESOWEST, GIS, photos, MOIDIS and our internal team of experts – data, meteorology.
- We flag almost all PM10 events greater than the NAAQS; for ozone annually track high values mainly due to wildfiresd and stratrospheric intrusions

Tracking/Communication:

- We have an internal tracking sheet, at this time not tracking for ozone;
- Communication
    - Case by case
    - No formal process
    - Usually occurs under a SIP process
    - We use this process to improve our performance on packages
    - Dust controls are the most subjective and problematic areas (for A/U areas)
    - Ozone intrusions have not risen to the level of having regulatory impacts
    - The policy group talks with EPA once/month – is a venue for communication

Requests from the state:

- Clear expectations on:
    - Radius of influence (specific distances for urban/rural monitors – i.e. 1-2 miles) from affected monitor for local dust controls
    - Emissions magnitude cutoff for sources to be controlled
    - Stationary source Q/d – our permits rules go down to 1-2 tpy so it's already overkill
    - Expectations for other source categories/federal areas where state has no jurisdictions (i.e. agriculture, federally managed lands)
- Communication/transparency:
    - Approve, respond in a timely manner
    - Adhere to strict timelines for feedback to us
    - When not responding after many years, don't ask for more data; the realities surrounding the event are long past (esp. when talking about local dust control measures)

State is considering:

- Sharing methods they are considering for ozone wildfires EE methods
- Meeting with region to learn what they are expecting for ozone.