Message

From: Taipale - CDPHE, Curtis [curtis.taipale@state.co.us]
Sent: 7/5/2017 6:58:39 PM
To: Fulton, Abby [Fulton.Abby@epa.gov]
CC: Morales, Monica [Morales.Monica@epa.gov]; Chris Colclasure - CDPHE (chris.colclasure@state.co.us) [chris.colclasure@state.co.us]; Gordon Pierce [gordon.pierce@state.co.us]; Amanda Brimmer (abrimmer@raqc.org) [abrimmer@raqc.org]; Ken Lloyd (klloyd@raqc.org) [klloyd@raqc.org]; garrison.kaufman@state.co.us; Jackson, Scott [Jackson.Scott@epa.gov]; Dresser, Chris [Dresser.Chris@epa.gov]; Tonnesen, Gail [Tonnesen.Gail@epa.gov]; Robyn Wille [Robyn.Wille@coag.gov]
Subject: Re: 179B OAQPS Questions for Review

Hi Abby,

Thank you for compiling a list of our questions. I have highlighted our suggested edits in bold yellow. I want to clarify that we are exploring the 179B process in advance of any potential summertime ozone levels over the standard to better understand the policy options available to the RAQC and AQCC under 179B. Accordingly, I have edited the second sentence to reflect this approach. The other areas that are highlighted reflect more detailed timing and SIP revision questions.

Colorado has submitted their 2008 ozone moderate area attainment plan and RACT analysis which EPA plans to act on prior to the July 20, 2018 attainment due date. This means the State would meet requirements under 179B(a) and **is considering** submitting a demonstration under 179B(b) so as to avoid reclassification to serious in Jan. 2019.

1. Timing

a. When would EPA need Colorado's 179B demonstration by to avoid reclassification?

i. Does the plan need to be submitted prior to EPA proposing reclassifications**, prior to the attainment date (July 20, 2018), prior to the deadline for EPA to reclassify (January 20, 2019), or** before reclassifications are finalized?

ii. If the modeling analysis cannot be completed prior to submittal, can Colorado submit a partial 179B demonstration, as long as it gets the full and complete demonstration submitted prior to January 20, 2018 (the deadline for EPA to reclassify)?

b. When does EPA need to act on Colorado's 179B demonstration in order for Colorado to avoid reclassification?

i. Does EPA have to act on Colorado's submittal prior to the Jan. 2019 reclassification date?

2. Demonstration Format

a. **If Colorado has an approved attainment plan for its Moderate area SIP, does the 179B(b) demonstration need to be accompanied by a SIP revision?**

b. If EPA has not yet acted on Colorado's Moderate area SIP (including the attainment demonstration), does the 179B(b) demonstration then need to be accompanied by a SIP revision?

c. What should the narrative look like for supporting the demonstration?

i. Can the demonstration follow the format of exceptional events packages?

d. What supporting technical analysis does Colorado need to include in their demonstration beyond just the modeling?

3. Modeling

a. Please provide feedback on the revised attached PPT from the Regional Air Quality Council with their analysis of the contribution of international anthropogenic contributions to O3 design values in the Denver area. The presentation was first shared with several people in OAQPS by Gail Tonnesen on June 6th. What additional analyses is needed?

b. Does modeling need to be done again for 2017?

Please let me know if you have any questions.
Thank you,
Curt

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Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more.

On Fri, Jun 30, 2017 at 8:37 AM, Fulton, Abby <Fulton.Abby@epa.gov> wrote:

Good Morning,
Below are the questions we'll be sending to OAQPS in regard to 179B. Please provide your comments/additional questions by COB Wednesday, July 5th. I will track down the 179B submittals for El Paso, Imperial Valley, and Nogales so you can see what those look like. I'll also talk to ORC once we have an attorney assigned to this project and provide you with some detail regarding what would happen if the demonstration was submitted in pieces.

Can someone please send me the updated PPT so I can attach it to the email for OAQPS?
Thank you.

Colorado has submitted their 2008 ozone moderate area attainment plan and RACT analysis which EPA plans to act on prior to the July 20, 2018 attainment due date. This means the State would meet requirements under 179B(a) and would therefore be submitting a demonstration under 179B(b) so as to avoid reclassification to serious in Jan. 2019.

1. Timing

a. When would EPA need Colorado's 179B demonstration by to avoid reclassification?

i. Does the plan need to be submitted prior to EPA proposing reclassifications or just before reclassifications are finalized?

b. When does EPA need to act on Colorado's 179B demonstration to avoid reclassification?

i. Does EPA have to act on Colorado's demo prior to the Jan. 2019 reclassification date?

2. Demonstration Format

a. Are demonstrations submitted under 179B(b) still considered a SIP revision? Does the demonstrations need to follow all the requirements for submitting SIP revisions?

b. What should the narrative look like for supporting the demonstration?

i. Can the demonstration follow the format of exceptional events packages?

c. What supporting technical analysis does Colorado need to include in their demonstration beyond just the modeling?

3. Modeling

a. Please provide feedback on the revised attached PPT from the Regional Air Quality Council with their analysis of the contribution of international anthropogenic contributions to O3 design values in the Denver area. The presentation was first shared with several people in OAQPS by Gail Tonnesen on June 6th. What additional analyses is needed?

b. Does modeling need to be done again for 2017?

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