

**EAST TEXAS COUNCIL OF GOVERNMENTS
NETAC TECHNICAL ADVISORY COMMITTEE**

**Thursday, December 4, 2014 10:30AM
East Texas Council of Governments
3800 Stone Road
Kilgore, TX**

MINUTES OF MEETING

1. Call to Order: Jim Mathews, NETAC General Counsel

Jim Mathews called the meeting to order at approximately 10:35 A.M.

2. Roll Call: Julie Burnfield, ETCOG Economic Development Lead

Technical Advisory Committee Present

Jim Mathews, NETAC General Counsel
Karen Owen, Longview MPO
Brett Huntsman, Longview MPO
Greg Morgan, City of Tyler
Carrie Paige, EPA
Doug Boyer, TCEQ
Kimberly Hughes-AEP/SWEPCO
Jeremy Halland, Luminant
Rick Hanning, Luminant
Scott Snedden, Westlake Chemical Company
Holly Landuyt-AEP/SWEPCO
Sharon Wellman-Eastman Chemical Company
Shellie Dalby-Eastman Chemical Company

Others Present

Greg Yarwood, ENVIRON
Sue Kembal-Cook, ENVIRON
Julie Burnfield, ETCOG
Carla Gross, ETCOG

3. Discussion and Approval of Minutes of April 22, 2014: Jim Mathews

The minutes were approved unanimously.

4. Update on EPA's Review of the Ozone Standard: EPA Representative; Carrie Paige, EPA

EPA is proposing to revise the primary and secondary standards of ozone. The primary standard will be set somewhere in the range between 65ppb and 70ppb. They will also be receiving comments on a standard as low as 60ppb as well as leaving the standard at 75ppb. The secondary standard will be set somewhere between 65ppb and 70ppb and comment will be held for this as well as for keeping the secondary standard at 75ppb.

They are also seeking comments on a different form of secondary standard which is the W126 form. This form is an hourly weighted value taken from 8am to 8pm accumulated over three consecutive months with the highest ozone values and then averaged over three years. This form is not more protective than the ppb form, it is just different and so they wanted to take comment on a different form as well.

EPA is also taking comments on all aspects of the designations process. The proposed rule will have a 90 day comment period that begins the day the rule is published in the Federal Register. There will also be public hearings in January. All revisions to the standard have to be completed by October 1, 2015. Designations will follow the final rule making. States will submit recommendations to EPA not more than one year after the final rule making. EPA has to finalize designations not more than two years after revising the standard which would be in October of 2017. A Classification of designated areas will also be released.

A slide was shown of a model projection by EPA of the counties that will be in attainment or non-attainment by the year 2025 based on the emissions reductions programs used between now and that time. The map showed that Gregg County would not be in attainment of the 65ppb standard in the year 2025. If standard is set at 70ppb then the area would be in attainment based on these projections.

A discussion was held regarding clarification of dates and timelines for designations and classifications. Group concerns were also discussed regarding projections.

5. Report of Status of FY 14-15 PGA Amendment: Julie Burnfield

ETCOG executed an amendment with TCEQ on November 24th which allotted funding for the Ozone Action Plan, and moved the deliverable date for the emissions review task from August 15, 2014 to December 15th 2014. \$8,000 has been moved from the Photochemical modeling task to the Ozone Action Plan task which is due December 31st, 2014 and also a new task with \$8,000 has been added to develop a FY 16-17 work plan.

A discussion was held about the timetable for amendments and that they can only happen once every quarter.

6. Discussion of Ozone Advance Path Forward letter of Ozone Advance Action plan: Jim Mathews

In November of last year, we were accepted into EPA's Ozone Advance program. Within a year after acceptance, we have to submit to EPA a Path Forward letter or an Ozone Action Plan. The Path Forward letter says here is what we are going to do to reduce emissions going forward. The Ozone Action Plan is a more comprehensive document and lays out what actions the area has taken in the past to study and understand ozone

problems. It also contains an area where you tell them what your strategies are to continue to stay in attainment with the standard. We are somewhat unique in East Texas because we have a lot of transport coming into the area, a lot of meteorology that affects us, and a lot of our own unique sources in the area. We have received some responses from local entities with regards to strategies they are or will employ to reduce emissions and improve air quality in the future. These can be included on our plan. The program is seen as a voluntary agreement with EPA where they can know we are doing everything possible to stay in attainment with the standard. NETAC has succeeded in avoiding a non-attainment designation since 1996. The Technical Committee agreed that NETAC should move forward with the Ozone Action Plan as opposed to the Path Forward letter.

A discussion was held as to what constitutes local entities and also a discussion as to when the Ozone Advance Action plan would be due (December 31st). Another discussion was held of the benefits of the Path Forward letter versus those of Ozone Advance Plan and the funding that is set aside for the task.

A vote was taken to carry forward the recommendation to pursue the Ozone Action Plan to the Policy Committee and the result was unanimous.

7. Review of 2014 ozone season, 2014 high ozone days and recent trends in ozone: ENVIRON

The ozone levels in East Texas have come down dramatically since the three monitors were put into place. The 2014 fourth high ozone values decreased for all three monitors in the area and have steadily gone down since 2011. The 2014 values are the cleanest since the monitors were installed. The reason for this was that the weather in 2014 was not conducive to making high ozone. This is good news as we are using attainment designation based on FY 14, 15, 16; we are starting out with the cleanest year ever.

Over the years they have analyzed weather, ozone, and ambient data and found that high ozone days tend to occur when the winds are from the North through the South East. This tends to correspond with high background ozone levels coming into our area. The other factor in ozone is high temperature. What was concluded from this is that the weather in 2014 was not conducive to high ozone.

All three monitors attain the 2008 NAAQS of 75 ppb, 2014 had the lowest recorded values for Longview and Tyler. Only Karnack attains a NAAQS in the 60-70ppb range, Longview and Tyler would be above the standard.

There hasn't been a value as high as 90 in many years at the monitors. Going down to a 70ppb standard Longview could be as high as 75ppb, Tyler 75ppb and Karnack 76ppb for their design value to attain a 70ppb level which is the range of recent values at all three monitors. If we go down to 65ppb that is no longer true.

At 65ppb threshold, transport from the South becomes important. ENVIRON evaluated all days for possible first impacts. They did not select any days for further analysis as exceptional events. Full high ozone day analysis will be shown in the Conceptual model update.

In 2014 there were 8 days with 8-hour Ozone >65ppb: April 25, May 3, May 4, May 5, May 16, July 5, July 23, Sept 8th. Each day was analyzed in detail as to why they had high ozone levels on that day. Reasons included high regional background, southerly winds, low regional background, easterly winds, HRVOC impact, and coal-fired power plant plume impacts.

A discussion was held regarding relevancy of prior work and the history of trying to put another monitor in Smith County. Another discussion was also held regarding international/border background ozone levels.

8. Update on new ozone model for 2012: Doug Boyer, TCEQ

TCEQ's modeling has been updated for SIP plan purpose and from history they have started with modeling days, to weeks, to months at a time. They tend to stick with their modeling data but 2006 is getting old and so they have evaluated years and have focused on 2012 because it had ozone conducive conditions. In 2012 there were only 6 days that went above the 75ppb standard. A computer simulation is used to predict in the future if an area is going to meet the ozone standard. In order to do this, they model a past ozone event, which most recently has been the 2012 ozone season (April-October). More about this model will be heard about at future meetings. Right now they are focusing on getting the model to run well, and then they will be able to give out more information to interested parties.

A discussion was held regarding categorizing issues TCEQ is working on in order to release the 2012 modeling year. Files are available on the TCEQ website and more information can be requested directly from the agency.

9. Update on FY 14-15 work plan technical studies: ENVIRON

For each task, we submit a Quality Assurance Project Plan (QAPP) to TCEQ. This is a document that outlines the technical methods for the study and how we plan to make sure that the document is done properly. Once it is approved work can begin on the technical tasks.

Tasks 1-4 were presented in great detail and outlined the progress, work done so far, and work yet to be done on each technical item. ENVIRON's slide show can be referenced for more technical detail.

a. 2015 SOF Study at Sabine Industrial District

In 2012 a study was conducted to measure highly reactive emissions downwind of the Sabine Industrial District. Once this was completed, they compared it to the emissions inventory. There was a discrepancy, so the study is going to be done again to see if it can be done better and if they can identify the source of the discrepancy between what they measure in the air and what is in the emission inventory. Plans are to conduct a study in April 2015 and it will be two weeks long as data cannot be collected every day due to cloudiness and bad weather conditions. ENVIRON has held communications with

Eastman on how to improve the next study and good information was gathered. The single most important item in the emissions report is characterizing the wind speed at ground level and above tree height properly. A wind profiler is the best way to measure this and ENVIRON is going to be able to obtain one for use. Another thing they can do is conduct a blind test of emission method by doing a controlled release of ethylene to determine accuracies. The third thing that could be done is ground-level measurements to assess vertical gradients. Unfortunately there is insufficient funding for all extra elements.

A discussion was held regarding whether April is historically a cloudy or a sunny month and whether or not people in Sweden have done a blind test or not.

b. 2012 WRF meteorological modeling

They are currently working on the performance of the weather model that is used to supply information to the ozone model. They have some recommendations that they believe can be used to improve the model simulations of wind and clouds in Texas that will improve the accuracy of the ozone model. TCEQ made an initial WRF fund for June 2012. ENVIRON evaluated this model run with focus on North East Texas and they found that there was surface weather at CAMS sites, precipitation, and clouds that all went into quantifying how well the model worked. They also found that there was persistent high bias in wind speed, which was less pronounced at Tyler.

ENVIRON's recommendations are that they work together with TCEQ to improve WRF performance in Northeast Texas before running CAMS ozone model. They suggest doing a re-run evaluation with airport weather observations to determine if siting issues are affecting results. They also suggest doing a re-run WRF with cloud algorithms developed by EPA and slated to be released shortly. Lastly they suggest testing the effects of using different surface roughness data in WRF

No discussion was held following this presentation item.

c. Review of 2012 emission inventory

Current tasks are focused on emission inventory studies, monitoring, and photochemical modeling. A conceptual model of ozone is made which is a summary of everything that is known about ozone formation in the area. This document is updated every two years. ENVIRON is working on an evaluation of emission control strategies. Last year they sent out a survey to let them know what air quality programs they are undertaking or may undertake in the future. Some information was received from some industries and from the Cities of Longview and Henderson. Another letter will be sent out this year as all this information will be included into the Ozone Action Plan.

No discussion was held following this presentation item

10. Discussion of FY 16-17 Work Plan: ENVIRON

The main elements included in the work plans are monitoring, emissions inventory and photochemical modeling to make projections of what ozone will be like in the future. During this two year period, the ozone standard should be moving forward and we may be needing to make projections of what will be happening in the 2020 timeframe. Hopefully by this time they will be working with the new 2012 model that TCEQ is developing.

ENVIRON will want to understand emission projections for the area, what will be happening with oil and gas production, if there are any new sources of ozone, or any emission reductions that they know will be going into place.

11. Other Business

The question was asked if there is going to be an official NETAC comment on the standard. The response was given that NETAC should decide if they want to comment and if there is any interest a conference call could be held in order to decide what to write.

12. Adjournment

The meeting was adjourned at 1:31PM