

## **Pinedale Anticline Working Group**

### **January 25, 2005 Air Quality Task Group Meeting Notes**

**Attendees:** See attached sign-in sheet.

Co-chairs Terry Svalberg and Cara Casten opened the meeting with members of the group and public attendees introducing themselves.

#### **Introductions:**

##### **Members present:**

1. Terry Svalberg, USFS, Air Quality Specialist.
2. Cara Casten, WY. DEQ Air Quality Division.
3. Jim Sewell, Shell Exploration & Production Co.
4. William Belveal, concerned citizen.
5. Mike Golas, Questar, Environmental/safety program.
6. Jonathan Ratner, Western Watersheds.
7. Susan Caplan, BLM State Office, Meteorologist.
8. Perry Walker, concerned citizen, was able to attend only for portions of the meeting due to prior job related commitments.

##### **Public Present:**

1. Ted Porwoll, USFS Air Quality Technician.
2. Sallie Otteman, BLM Pinedale Field Office.
3. Joe Delwiche, EPA Region 8, (by telephone).
4. Sonia Otteman, USFS, recorder
5. Tom Darin, Jackson Hole Conservation Alliance

##### **Representation:**

- + Sallie Otteman attended the meeting and represented the BLM Pinedale Field Office.
- + Joe Delwiche from EPA Region 8 participated by phone.
- + Sonia Otteman attended the meeting as the minutes recorder and as an USFS employee.

##### **Agenda:**

- + Cara presented the agenda for the meeting and asked if there were any additions or comments from the group.
- + Handout (agenda).

##### **Meeting Notes:**

- + Because the notes from the January 4, 2005 meeting had not been available for review prior to the meeting, the notes were not approved by the group. The group was asked to look them over and send any changes to Ted. We will discuss and approve these notes at the February 17<sup>th</sup> meeting.

✚ The Task Group engaged in a brief discussion of Action Items identified at the previous meeting.

1. **Request for re-initiation of BLM NO<sub>x</sub> tracking:** Susan Caplan responded. The BLM has no funding right now to re-initiate NO<sub>x</sub> tracking—a completion date to get funding and begin tracking has not been decided. A format for the tracking was also discussed. Casten said there is a format that the DEQ requires, but the BLM will have to come up with a format for on-the-ground tracking.
2. **Forest Service Role in Air Quality Task Group:** FS should be an active member of the group. This was decided at the PAWG meeting by the consensus members. Authority was given to the group to decide roles.
3. **Sublette County Representative:** None as of January 25, 2005.
4. **Identify and Secure Short-term Funding:** The PAWG was charged with writing letters to get funding. Terry Svalberg wrote a letter to the DEQ, Dan Olsen to get funding for the rest of this fiscal year. Olsen said he will come up with the additional \$32,000 to get us through Sept. 30<sup>th</sup>.
5. **Draft Air Quality Monitoring Plan:** See below.
6. **Re-Initiation of Scene Monitoring:** Jim Sewell gathered the costs for scene monitoring. Equipment costs are estimated at \$5-7,000 and operational costs are estimated to be nearly the same, \$5-7,000.
7. **Air Quality Primer:** Addresses rules and regulations and gives a brief history of Air Quality history and monitoring in the area of concern. All conceded it would be useful information that could be quickly gathered.
8. **Invite Scott Copeland and Lincoln Sherman:** They were unable to attend. Casten said she also invited or it was suggested to invite John Watson as well. He was not present at the meeting either.
9. **Re-Write Intro to Monitoring Plan:** Jim Sewell and Terry Svalberg both wrote additions to the introduction.
10. **Information on Naughton Power Plant:** Casten was asked at the previous meeting for emissions at the Naughton Power Plant Unit 3, Low NO<sub>x</sub> burner. The following was the information provided:
  - Permit MD-403 4/28/99
  - Potential 10,807 TPY minus actual 1,000 TPY from 96'-97'
  - 00'-01' Actual Average 12,375.35 TPY
  - PTE=14,140 2764.65 below PTE and 3764.65 below 96'-97' actual.
  - Jonathan asked how these numbers compare to the Pinedale Anticline. Caplan said they are nearly the same as shown

above, but she did not have the numbers in front of her. Terry explained that what was modeled in the BLM's EIS was minus 2,000 TPY as apposed to the 1,000 stated above.

**Draft Monitoring Plan (discussion):**

- ✚ Handout (Draft Air Quality Monitoring Plan). Everyone already had this Draft with previous changes made.
- ✚ Terry handed out a copy of his introductory paragraph to be included in Section 1.0 of the Draft Monitoring Plan.
- ✚ Terry reviewed an email sent by Karol Kruse which explained what is to be included in the Reports given by the working group: ID of data available -ID of what is already done -ID of critical monitoring needs and/or data missing -ID Future Monitoring -Prioritize above information -Make suggestions of who should monitor and where funding should come from –Mitigation modifications and measures.
- ✚ Discussion followed regarding scope of mitigation and the area to which the Draft Monitoring Plan should apply. Some mitigation measures have already been laid out in the BLM's ROD, EIS and FONSI documents. Once again the big picture was mentioned and the group decided that the Jonah II field should be included in the document, because it is included in the Appendix C3 which lays out parameters for the task group to work with, through and on. The task group decided to call the monitoring area PAPA/Jonah II Area.
- ✚ Mr. Belveal then asked what measures were in effect for flaring. His primary concern is valley visibility. Casten replied that flaring is monitored and permitted on a company by company basis. Casten also gave an update on the Ag Burning Bill (HB 29), which allows Ag burning to occur without tracking. Belveal and everyone else in the room then agreed that such a bill would put “undue burden” on industry. Without tracking for Ag burning, wildfire, NOx etc. it is very difficult to put stipulations on one group or another.
- ✚ In section **1.0 Introduction of the Draft Monitoring Plan**, the following changes were suggested and accepted: Terry's new paragraph which gives a larger picture, more of a “worldly view” of what is going on. Rename area that the plan governs to PAPA/Jonah II Area. Add that this plan is a work in progress and can change or be amended.
- ✚ In section 1.1 the following suggestions were made and accepted: A discussion of Plan vs. Report—what should be included in the plan vs. what should be included in the annual reports to the PAWG. The group agreed that they should develop the plan before worrying about developing the report—focus on task at hand. Working group then agreed to meet semi-annually (at a minimum).
- ✚ In section 1.2 the following changes and suggestions were made and accepted: Again changes to call working area PAPA/Jonah II Area. Add in comparisons of MOXA and SWWYTAF. Add words describing pollutants including VOCs. Take out the word concentrations because the word emissions assume concentrations. Define significant impact. Jonathan asked what is significant impact and Caplan said she has a definition that can be inserted, in the paragraph or as an appendix to the document. A definition was not given at that time. The group agreed to add

- mitigation measures set forth in the ROD and FONSI. Two paragraphs should be added in this section explaining Monitoring and Modeling processes. Lastly, it was agreed that wording should be changed from “air quality monitoring stations and processes” to “air quality related sites, “...in line 29 of section 1.2.
- ✚ In section 1.3 the following was discussed and accepted: It was agreed that an opening paragraph discussing the purpose of the report should be included. Jim Sewell offered to write the paragraph. After discussion with Joe Delwiche, it was agreed that a summary of current data should be included as a bullet topic in the report.
  - ✚ Between sections 1.3 and 2.0 a brief public comment period was held for Tom Darin of the Jackson Hole Conservation Alliance, who had to leave the meeting early. Tom asked if the Monitoring Plan would include future development in these fields, not just the current development. Tom suggested that the working group be expanded to include the entire Pinedale Field Office, not just the specified fields. Perry Walker expressed concern that the group was “biting off more than it can chew.” The members of the group decided to bring the idea forward and suggest to the BLM, instead of separating emissions from the fields to look at emissions as a whole.
  - ✚ Section **2.0 Air Quality Monitoring (Existing)** was discussed and accepted as follows: The group discussed using words that are all inclusive—words that include all types of air quality tracking, sampling, modeling etc. A round table discussion on semantics was held, and it was determined that tracking is a paper trail of data. Sampling is a way of collecting data. Modeling is a way of using data to project or estimate changes. Monitoring is all inclusive, therefore the title of 2.0 would remain the same, Air Quality Monitoring (existing). In 2.0 it was agreed that the words tangible equipment would be dropped from line 13.
  - ✚ In section 2.1 the following was discussed and accepted: It was agreed that there are three monitors in the PAPA, however those monitors do not measure HAPS and VOCs. The way the paragraph reads, HAPS and VOCs are measured by those three monitors. Secondly, the group said they want to include information in this paragraph regarding the EnCana surface lease—specify monitors present etc.
  - ✚ In section 2.2 the following was discussed and accepted: Upper Frozen Lake should be added into Long Term Lake Sampling on the Bridger-Teton. A new paragraph will be added in this section by Terry. Change wording in line 15 of section 2.2.2 to read in wilderness areas instead of across the Forest outside the PAPA. It was agreed that the data produced by these monitors should be included in the annual report. All acronyms should be spelled out. And Terry is going to add the locations of the NADP sites. The group agreed that the CASTNET site location should be named. CASTNET is located with the NADP site. WARMS should be spelled out. In line 6 page 6, the group agreed that a sentence should be added explaining why the data is unreliable. IMPROVE should be spelled out, and in the optical section of this document.
  - ✚ Mike Golas then asked what should be included in the annual report? It was suggested that a subcommittee develop the criteria for the report, but the group decided it would be best to stay on the Monitoring Plan and decide what should go into the annual reports at a later date.

- ✚ The group decided to add a section on modeling. The section would explain the reason modeling is separated from the monitoring. This section will also be further clarified in that Aresol, Optical, and Scene monitoring would be defined. The Nephelometer section needs expansion—what the instrument does, where it is, and data produced. Lastly, in this section Terry Svalberg offered to try to get light pollution taken out of the Air Quality Monitoring Plan altogether—if not he would write something on it.
- ✚ In section **3.0 Existing Emissions Tracking**, the following was discussed and accepted: Emissions inventories background would be written by industry folks. Jim Sewell and Mike Golas will present the background information at the next meeting, including a possible spreadsheet in this section displaying the data, as well as which emissions are regulated and which are not. The group decided that emissions from the BLM RMP should be included—there is not specified date for when the RMP comes out. The RMP does not include burning wood, traffic, etc. off and outside BLM regulated lands. Mike Golas reminded the group that the focus of the group should be on NO<sub>x</sub> emissions and that including wood burning, etc. would be outside the scope of the Appendix C3. Susan Kaplan responded with a 1999 document that can be referenced—explaining the importance of including all air pollutants not just NO<sub>x</sub> emissions. The Amended Letter in section 3.2 needs to be pared down, but include past, present and future conditions. Casten said she would tackle the letter, and include some explanation of the concept of emissions. Section 3.3's title was changed from Emissions Monitoring to Emissions Tracking. This portion of 3.0 will refer the reader to Section 5.0. Jonathan had questions regarding the language in this portion. Gathering Companies refers to Gas Companies, and gas is consumed at compression sites as fuel. Jim Sewell said gas companies don't usually track emissions from rigs—only those that track diesel consumption usually have data regarding rig emissions. It is not required that these emissions be tracked either.
- ✚ In section **4.0 Existing Mitigation Measures**, the following was discussed and accepted: There was some talk about required vs. voluntary emissions tracking—most oil companies do emissions tracking on their own. The BLM has some mitigation measures in place in the ROD and EIS. Section 4.0 was restructured as follows: 4.1 BLM ROD, 4.2 DEQ Regs. 4.3 Volunteer Mitigation Measures, 4.4 Questar.
- ✚ In section **5.0 Existing WAQSR Permitting Requirements**, the following was presented and accepted: This section will be deleted and the information here will be put into section 4.0 or 6.0.
- ✚ In section **6.0 Monitoring/Mitigation Measures**, the following was discussed and decided: Ted Porwoll volunteered to write information on USFS AQRV monitoring and the continuation of long-term monitors. As well as rationalization for reinstating scene monitoring—short-term and long-term. These topics will make up 6.1 and 6.2. Terry Svalberg will write section 6.3 regarding the BLM fulfillment of the Amended Letter of Agreement for NO<sub>x</sub> tracking. Jim Sewell offered to write 6.4 regarding the Initiation of the Annual Air Quality Report submitted to the PAWG. More information is needed to fill data gaps, and a needs section should be developed. Clear objectives of the Monitoring Plan and perhaps

some goals. Regulatory structure is laid out in an appendix, as well the roles and responsibility of the agencies involved. Included would be future work required or needed to fill gaps and delineate a clear direction.

- ✚ Section **7.0 Funding** was discussed and accepted as follows: Terry Svalberg presented a spreadsheet highlighting current monitoring and items that need to be funded. Scene Monitoring needs to be added to the table, including costs. Jim Sewell also presented a table which points out the gaps in monitoring/data, and a summary for funding.

**NOTE:** All sections after 2.0 will be re-numbered when Modeling is developed and inserted as a section.

### **New Monitoring Ideas:**

- ✚ Perry Walker is concerned that lack of funding will determine which monitoring is done. For example, there is no SO<sub>2</sub> monitoring and SO<sub>2</sub> should be monitored. As well Met. Data should be archived, including wind speed and direction from the three Air Quality sites. SVR should also be archived from the sites.
- ✚ Cara Casten said agencies and contractors are hesitant to release data which has not been QA'd. Contractors use b-ext reading and scattering. SVR is only good for course interpretation. The group was not talking about actual data just about the Standard Visual Range figure which is shown on the WY VISNET website.
- ✚ Joe Delwiche said FLAG document includes established protocol for interpreting Visual data. Joe stated that the interpretation of this data is very complex and recommended that the group not attempt to interpret it on their own.
- ✚ Perry Walker is concerned that the TG is discouraging independent evaluation of data.
- ✚ William Belveal believes Perry has a valid point, if the data collected is defensible.
- ✚ Jim Sewell expressed the fact the monitoring plan lacks the ability to monitor HAPS, SO<sub>x</sub> and PM.
- ✚ There was discussion regarding how NAAQs differ from Increments.
- ✚ Joe Delwiche explained how EPA deals with non-attainment, SIP calls to the states, and the MACT imposed by the EPA.
- ✚ Casten said with HAPS monitoring, the state needs to look at how they would assess the data because there are not AAQS. "HAPS would reference concentrations established by the EPA, which are enforced by OSHA. These reference concentrations were established based on human health risks.

**NOTE:** Cara Casten will email assignments for next round of monitoring plan revisions. She will also accept all comments agreed upon at the Jan.25 meeting.

**Feb 17, 2005:** Meeting to finalize draft. 8-12 at the USFS Office  
Cara, Terry and Susan will spend the afternoon making changes to the final document.

**Feb 18, 2005:** No Meeting - Send final draft to PAWG.

## **Adjourn**

### **Attachments**

January 25, 2005 Draft AQTG meeting Agenda

List of attendees (sign in sheets)

Introduction Paragraph prepared by Terry Svalberg

PAWG Air Quality Task Group Draft Monitoring Plan

January 4, 2005 Meeting Notes.

Air Quality Monitoring Sites Table

Air Quality Monitors in the Pinedale Area Costs/Locations/Objectives Table