Appendix I

Minutes from Consultation Meetings

Interstate Regional Haze Meeting Summary
January 23, 2007
Point Clear, Alabama

An interstate Regional Haze consultation meeting was held on January 23, 2007 in Point Clear, AL to discuss the various components of the Regional Haze SIP as it applies to the Breton Wilderness Area, which is designated as a Class I area by the Clean Air Act.

There were representatives from the coastal states of Florida, Alabama, Mississippi and Louisiana, as well as a representative from VISTAS. CENRAP representatives were not in attendance at this meeting. A consultation meeting will be scheduled to include representatives of EPA and the FLM responsible for Breton.

Modeling was the first item for discussion on the agenda. The latest modeling runs for year 2018 show greater consistency between the RPOs results. CENRAP model results using the new IMPROVE algorithm puts Breton just below the glide slope showing that it meets approximately 95% of our reductions. The VISTAS model results show that Breton meets a little more than 80% of the reductions necessary to meet the glide slope. The most recent version of the CENRAP inventory was not available when VISTAS performed its modeling which could also account for differences in the modeling results. However, model performance in estimating 2000-2004 modeling results as they relate to actual monitoring data is very poor, allowing more uncertainty in an already uncertain process.

During the discussion of the modeling results Louisiana voiced its concern with the use of substitute data from the Gulfport Monitor. We believe that the data from this monitor skews the model performance as it pertains to Breton. There are distinct differences between the geography of the area as well as the urban versus non-urban siting of the monitors. Furthermore, the monitor at Gulfport is a SEARCH monitor, not an IMPROVE monitor. According to RH guidance, data is to be derived from IMPROVE monitors. Bottom line: Louisiana has a good case for using non-substituted data.

The states also discussed the impact of pollution on Breton and agreed that all modeling results show that sulfates seem to be the most pressing problem. Although CAIR is expected to provide reductions from the EGUs, it appears that non-EGUs may have to significantly reduce emissions in order for Breton to meet glide slope predictions for 2018. Louisiana representatives stated that the state is looking at methods of achieving the necessary reductions from the non-EGU components. VISTAS states are looking at this speciated component as well be it through some form of regulation or through the permitting process.

All of the states are in the process of making BART determinations. No state has constructed a draft rule. BART and reasonable further progress (RFP) seems to be a political as well as economic dilemma in the VISTAS states that were in attendance. Like Louisiana, the hurricane seasons of the past 2-3 years have wreaked havoc on

industry and its ability to make a comeback. The governments would rather suffer a little pollution instead of losing the economic backbone of a community.

There was much discussion on how to show RFP. Because Breton has the predicament of incomplete monitor data, there was a consensus that by showing the steady decline of emissions coupled with the reductions that will take place through state and national initiatives and the additional monitoring data that will be available from the Breton IMPROVE monitor, the state has fulfilled the requirements as well as can be expected. Additionally, several of the 20% worst days in the 2002 modeling year are coming from the Gulf of Mexico. VISTAS data indicates that if international emissions were taken into account, reductions projected as a result of CAIR would be sufficient to meet the uniform rate of progress in 2018. This provides further evidence that the state has fulfilled the reasonable progress goals. Louisiana also intends to use the studies compiled by Dr. Hsu which indicate that Breton does not suffer from Regional Haze, but rather from fog. This study shows that there are other mitigating factors which cause visibility impairment in and around the island chain.

All meeting attendees are aware of the eroded state of the islands, however, there was no interest expressed for pursuit of a reclassification of the area either from the Department of the Interior or Congress.

The group concluded the meeting by agreeing to continue these discussions via telephone. The next meeting will include representatives of EPA and the FLM.

List of Representatives:

Florida	Tom Rogers
Alabama	Leigh Bacon, Tim Martin, Scott Southwick and Chris Howard
Mississippi	Elliott Bickerstaff, Michelle Root, and Maya Rao
Louisiana	James Orgeron, Patrick Pakunpanya, Yvette McGhee and Vivian Aucoin
VISTAS	Pat Brewer

Breton Wilderness Class I Area
Regional Haze Consultation Meeting
October 30, 2007

Participants:

Alabama:	Leigh Barb Bacon and Tim Martin
Florida:	Tom Rogers
Louisiana:	James Orgeron, Vivian Aucoin, Michelle Morgan and Gilberto Cuadra
Mississippi:	Elliott Bickerstaff and Mary Evelyn Barnes
FLM:	Bruce Polkowski, Tim Allen, Jill Webster, Anne Mebane, and Meredith Bonds
EPA Reg 6:	Joe Kordzi

Discussion Topics:

Best Available Retrofit Technology (BART):

Alabama: No formal rule making has been undertaken in regards to BART. Alabama felt as though all necessary authority to enforce the BART control measures were afforded by the Regional Haze Rule.

According to department representatives, the only facility meeting BART requirements that is in the proximity to Breton is Big Escambia Creek, Escambia Operating Company LLC. The Big Escambia Creek gas production, treating and processing facility is a gas and condensate production, treating and processing facility. The facility has agreed to accept limits, which will mean a 40-50% reduction in SO_2. The facility is approximately 220 km from Breton.

Mississippi: No formal rule making has been undertaken in regards to BART. There are two facilities that are BART subject: Mississippi Phosphates and the Chevron Refinery, both of which are On the Mississippi Gulf Coast, about 50 km form Breton. Mississippi Phosphates total SO2 emissions are less than 2000 tpy and they already have dual absorption scrubbers with acid demisters. The engineering analysis finds that there are no further controls that are technically feasible.

The Chevron Refinery, Pascagoula, is currently under a Consent Decree Order which reduces SO_2 by more than 4000 tpy. NOx and PM_{10} reductions are included in the CD as well, but they are not as significant. With these reductions, the visibility impact dropped from 3.89 dv impairment to 0.79 dv impairment.

Louisiana: No formal BART rule making was undertaken. Those facilities that were subject to BART were either covered by CAIR reductions or by Consent Decree Orders. All model protocols except two have been submitted for approval by the FLMs and EPA. Emission reductions are expected to be significant.

Florida: Formal rule making was undertaken by Florida. There are three facilities in the Breton vicinity, but all have met exemption criteria. The largest utility in the area, Gulf Powers, Pensacola, is installing scrubbers on all units. SO_2 reductions are expected to be rather significant; NOx and PM reductions will also occur.

Florida is also promulgating a Reasonable Progress Rule. This rule is in the final stages and is expected to go final in December 2007, with an effective date of January 2008. This rule will require that 15 facilities (32 units) will undergo the 4 factor analysis as outlined in the Regional Haze rule. A compliance date of December 1, 2017 has been set.

All parties on the call also gave updates on Regional Haze SIP submittals and answered questions posed by EPA Reg 6 and the FLMs to satisfaction.