



Clean Air Act Advisory Committee

September 12, 2018



Welcome and Introductions

Upcoming BER Actions

Fee Rule Adoption

Portable Registration Program & Regional Haze

Implementation & Program Efficiency

2018-2019 Program Efforts

Emission Inventories

Fees

Nonattainment Area Redesignations

County Program Meeting

Air Quality Discussion



Upcoming BER Actions

Board of Environmental Review

October 5

- Adopt Fee Rule
 - Registered oil and gas facilities annual operation fee: \$850
 - MAQP or Title V Operating Permit annual operation fee: \$900
 - MAQP or Title V Operating Permit per-ton fee: \$44.35
 - Fees will apply to bills that go out in November

Board of Environmental Review

October 5

- Briefing on Portable Registration Program
 - Draft administrative rules developed with input from affected industry, Opencut program, NGOs, EPA
 - Stakeholder review planned before Board meeting

December 7

- Initiate Portable Registration Program Rulemaking
 - Many implementation conversations still to come

Board of Environmental Review

Early-2019

- Conversion of Regional Haze Federal Implementation Plan (FIP) to a State Implementation Plan (SIP)

Regional Haze – Second Planning Period

- Analysis efforts ongoing through regional organizations
- Looking closely at visibility monitoring data
- Up next: source pre-screening & 4-factor analysis

Implementation & Program Efficiency



2018
to
2019
Program
Efforts



What is
important?

How do we
pay for it?

2 Questions We Need To Ask

Data Collection

Emission
Inventories

Production
Data

Stationary
Sources

Portable
Sources

Oil & Gas
Well
Facilities

Stationary Sources

- Similar to 2018, we will be asking stationary sources to submit their emission inventories as soon as possible
- Inventories are used primarily to calculate fees
- **No changes to emission inventory process in 2019**

Portable Sources

- Portable Sources need to keep **accurate** production information
- Program is changing, but not the production records you are required to keep
 - We are not asking for production records to be submitted in 2019, but they need to be maintained for 5 years and will be used in the future for fees and compliance determinations

Oil & Gas Well Facilities

- Oil & Gas Well Facilities need to keep accurate production, operation, and emission information
- We will not be asking facilities to submit information during the emission inventory process in Spring 2019
 - ARM 17.8.1705 requires O&G well facilities to keep data for 5 years
- When Field Service Staff come out to visit you, they will require this information to assist in compliance demonstrations

How Do We Pay For The Work We Think Is Important To Do?

3 Sources of Revenue

General Fund

Federal Grants

State Special – Fees

Fees

Stationary Sources – Please submit emission inventories as soon as possible

- Provides more time for stakeholder conversations, allows us to determine what revenue we need to collect, and allows more time for budget development

2018

- Bills are mailed in November (new operating fees)

2017

- Based on Emissions / Production Information

2019

- Fund AQ Activities

Funding into the Future

The Air Quality Bureau needs to:

- Evaluate our programs and the revenue we need to implement them
 - Self-funded programs
- Determine other sources of more equitable funding

We need CAAAC to help us:

- Provide ideas and support in planning
 - Mid-term fee structure discussions after the 1st of the year

Nonattainment Area Redesignations

Area / NAAQS	Designated NAA
Missoula PM-10	November 15, 1990
East Helena SO2	November 15, 1990
East Helena Pb	January 6, 1992
Kalispell PM-10	November 15, 1990
Whitefish PM-10	October 19, 1993
Columbia Falls PM-10	November 15, 1990
Libby PM-10	November 15, 1990
Libby PM-2.5	April 5, 2005
Thompson Falls PM-10	January 20, 1994
Butte PM-10	November 15, 1990
Laurel SO2	March 3, 1978



County Meeting

- August 9, 2018 in Helena
- Butte-Silver Bow, Cascade, Flathead, Lewis & Clark, Lincoln, Missoula, Yellowstone
- Discussed: Fees & Funding, Portable Registration Program, Nonattainment Area Redesignations, Montana Smoke Management Program

Burning Air Quality Topics?

Smoldering Suggestions?

Fiery Air Quality Questions?





Thank You

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