

Memorandum

July 11, 2006

TO: MWAQC Technical Advisory Committee

FROM: Jeff King, COG/DEP

Subject: Contingency Measure Discussion Items

Contingency measures need to be included in the 8-hour ozone SIP. This memorandum provides a list of items for discussion.

Required Reductions

The contingency plan must contain measures that total 3% of the adjusted base year inventory. A minimum of 0.3% VOC must be included. Some possible VOC/NOx contingency levels are shown in the table below.

Contingency Requirement: Possible VOC/NOx Combinations

	VOC (tpd)	NOx (tpd)	VOC %	NOx %	Total %	VOC (tpd)	NOx (tpd)
Adjusted Base Year Inventory	504.71	638.75	0.3%	2.7%	3.0%	1.5	17.2
Total contingency reduction must equal 3%.							
Minimum VOC required is 0.3%.							
			0.5%	2.5%	3.0%	2.5	16.0
			1.0%	2.0%	3.0%	5.0	12.8
			1.5%	1.5%	3.0%	7.6	9.6
			2.0%	1.0%	3.0%	10.1	6.4
			2.5%	0.5%	3.0%	12.6	3.2
			3.0%	0.0%	3.0%	15.1	0.0

Potential Measures

Some candidate measures for consideration are:

- AIMS Phase II (2.5 tpd VOC)
- Additional EGU Controls (5-10 tpd NOx)
- ICI Boiler Standards (2-3 tpd NOx)
- MSW Incinerator Controls (3-4 tpd NOx)
- Distributed Generation Rule (1-3 tpd NOx)
- Cement Kiln Controls (TBD)
- Asphalt Production Controls (TBD)

The control measures workgroup could also review the Master List of Measures to identify additional candidates.

Trigger Mechanism

A mechanism is needed to trigger implementation of contingency measures for both RFP and attainment failures.

Schedule of Implementation of the Measures

The SIP will need to contain an implementation schedule.