

Metropolitan Washington Air Quality Committee

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TECHNICAL ADVISORY COMMITTEE

Date: February 10, 2006

Time: 10am to 12 noon

Place: COG Board Room, 3rd Floor

Agenda

- 10:00 1. Call to Order and Review of Meeting Summary (January 12, 2006)**
Chairman Jim Sydnor, Virginia Department of Environmental Quality
- 10:10 2. Proposed PM NAAQS**
Sunil Kumar, COG DEP, will present an analysis of the impact of proposed changes to the PM2.5 annual standard on compliance in the Washington, DC-MD-VA nonattainment area.
- 10:25 3. Mobile Emissions: SIP Inventories**
Sunil Kumar, COG DEP, will discuss recent decisions on methods and priorities for developing mobile emissions inventories for the region.
- 10:40 4. Off-road Equipment Inventory Survey**
Joan Rohlfs, COG DEP, will discuss developing a survey of non-road equipment in the Washington, DC region.
- 10:55 5. Control Measures: Update**
Jeff King, COG/DEP, will provide an update on evaluating reasonably available control measures (RACM).
- 11:10 6. MWAQC FY07 Work Program and Budget: Overview**
Joan Rohlfs, COG/DEP, will provide an update on developing the MWAQC budget for 2007.
- 11:25 7. New Subcommittee: Local Government Initiatives**
Jim Sydnor, VADEQ, will propose a new TAC Subcommittee.
- 11:40 8. State and Local Air Agency Report**
- Legislative Update
 - Ozone Transport Commission Meetings
- 11:55 9. Set Date for Next Meeting, Future Agenda Items, Adjourn:**
Next TAC Meeting: March 10, 2006

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MWAQC Technical Advisory Committee Meeting Summary January 12, 2006 10am to 11:30am. COG/DEP Conference Room Teleconference

Present:

Tad Aburn, Maryland Department of Environment (by teleconference)
Tom Ballou, Virginia Department of Environmental Quality (by teleconference)
Randy Carroll, Maryland Department of Environment (by teleconference)
Kipp Coddington, Greater Washington Board of Trade (by teleconference)
Brian Hug, Maryland Department of Environment (by teleconference)
Maurice Keys, District of Columbia Department of Transportation (by teleconference)
Barbara Hardy, Fairfax County Department of Environmental Services (by teleconference)
Jeff Harn, Arlington County Department of Environmental Services (by teleconference)
Sonya Lewis-Cheatam, Virginia Department of Environmental Quality (by teleconference)
Chris Meoli, Virginia Department of Environmental Quality (by teleconference)
Doris McLeod, Virginia Department of Environmental Quality (by teleconference)
Jim Ponticello, Virginia Department of Transportation (by teleconference)
Mary Richmond, Montgomery County Department of Environmental Protection (by teleconference)
Howard Simons, Maryland Department of Transportation (by teleconference)
Jim Sydnor, Virginia Department of Environmental Quality (by teleconference)
Ram Tangirala, District of Columbia Department of Health (by teleconference)
Stanley Tracey, District of Columbia Department of Health (by teleconference)
Flint Webb, Fairfax County Federation of Citizen's Associations
Carl Winstead, Fairfax County Department of Transportation
Mike Zamore, Maryland National Capital Parks and Planning Commission

Staff:

Mike Clifford, COG/DTP (by teleconference)
Jeff King, COG/DEP
Sunil Kumar, COG/DEP
Joan Rohlfs, COG/DEP
Daivamani Sivasailam, COG/DTP

Observers:

Charley Baummer, Metropolitan Washington Airports Authority (by teleconference)
Debra Jacobson, George Washington University (by teleconference)

1. Call to Order. Mr. Sydnor called the meeting to order at 10:05. The minutes of the December 9, 2005 meeting were approved with no changes.

2. Power Plant Regulations: Update. Tad Aburn and Jim Sydnor provided updates on the status of the proposed Maryland Clean Power Rule and the CAIR/CAMR Implementation Rules in Virginia. Tad Aburn said that the Clean Power Rule has been publicly released. The rule covers three pollutants - SO₂, NO_x, and mercury - and applies to the six largest electric generating plants in Maryland. Allowance trading will not be permitted. The nitrogen oxide requirements are implemented in two phases. Companies must meet a system-wide NO_x emission rate of 0.125 pounds per million Btu (lbs/MMBtu) of energy produced by 2009 on an ozone-season and year-round basis. This rate is reduced to 0.100 lbs/MMBtu in 2012 if Maryland's monitors do not show attainment of the ozone standard by 2010. This requirement is expected to drive the installation of Selective Catalytic Reduction (SCR) technology at most covered units. For sulfur dioxide, companies must meet a system-wide SO₂ emission rate of 0.225 lbs/MMBtu by 2010 year-round. This requirement is expected to drive the installation of scrubbers at all larger units. For mercury, a company's system must reduce emissions by 80% by 2010 and 90% by 2015. Tad asked that the draft rule and fact sheet be circulated by email.

Mary Richmond asked about the impact of the proposed rule on installation of emission controls at the power plants in Montgomery and Charles Counties in Maryland. Tad Aburn said that while some units are already controlled, the owners will need to install additional controls to meet the new emission rates. Stan Tracey asked about possible legislation in Maryland targeting power plants. Tad Aburn said that there is a 4 pollutant bill being considered in Maryland called the Healthy Air Act. Debra Jacobson asked whether there was any indication that units may shut down and be replaced with renewable generation sources given the potential for higher control costs under the Clean Power Rule requirements. Tad Aburn said that there are no projections of unit shutdowns, but that the Public Service Commission is evaluating this possibility. He said that Maryland does have an allowance set-aside for renewable generation. He said that local reductions will be important for demonstrating attainment.

Ram Tangirala asked Tad Aburn to elaborate on the phased approach for NO_x reductions in the Clean Power Rule. Tad Aburn said that the Clean Power Rule is designed to be an attainment rule. The nitrogen oxide requirements are implemented in two phases. The allowable emission rates are only reduced beyond the 2010 requirements if Maryland's monitors do not show attainment of the ozone standard by 2010. In response to a question from Flint Webb, Tad Aburn confirmed that the two phase system is only applicable to NO_x. There is only one phase for achieving SO₂ reductions under the rule.

Jim Sydnor summarized the status of several regulatory and legislative initiatives in Virginia. He said that the Air Pollution Control Board approved the release of Virginia's proposed CAIR implementation rule for public comment. The proposal is consistent with CAIR requirements in terms of timing and magnitude of emission reductions. However, the proposal does restrict trading of allowances so that emission reductions must occur in the nonattainment areas. He said that a bill has been introduced in the General Assembly called Virginia Clean Smokestacks. The draft legislation further restricts emissions and moves up dates for compliance. The Air Pollution Control Board has not yet approved release of the Clean Air Mercury Rule for public comment. The Board asked that the rule be revisited to address a proposal from STAPPA/ALAPCO. Debra Jacobson said that the workgroups supporting the CAIR and CAMR regulations in Virginia did discuss the issue of mercury trading in Virginia and the need for an allowance set-aside for renewables and energy efficiency. There was no consensus on whether trading of mercury allowances was legal under state law in Virginia. The proposal may seek comment on whether the number of set-aside allowances should be expanded.

3. Attainment Modeling Status Report. Tom Ballou provided a brief update on attainment modeling for the 8-hour ozone SIP. He said that MWAQC was briefed on the modeling approach in December. He said that an email has been sent proposing several future base case scenarios. Tom Ballou said he needs comments from the modeling subcommittee on the proposals, and that he needs updated 2009 emissions information for Maryland's electric generating units. Ram Tangirala said that the District will be providing updated emissions information for this sector as well. Tad Aburn said that the University of Maryland also needs the 2009 inventories to support their modeling efforts. Joan Rohlf's suggested that a broader coordination call be arranged in the near future. Tom Ballou said he needs any 2009 emission inventory revisions soon if they are to be incorporated into the 2009 future case modeling runs. He said that any revisions to the 2002 inventory will have to be incorporated into the final base case runs.

4. Emission Inventory: Update. Ram Tangirala and Sunil Kumar briefly discussed issues related to emission inventory development. Sunil Kumar asked about the updated emission inventory projections to be provided by the District. Ram Tangirala said that the revisions to the point source inventory for the District will affect both the 2002 and 2009 values. Joan Rohlf's said that there was a call held recently to discuss the mobile source emission inventory. She said that not all of the states were represented so the group could not make final decisions on methodology. She said that a new call would be scheduled. Charley Baummer said that he is still working on developing the emissions inventories for Dulles and Reagan National airports. He said that the mixing height issue still needs to be discussed.

5. Control Measures: Update. Jeff King provided an update on control measures development. He said that the OTC is developing straw proposals. The OTC is holding conference calls with member states, the next call is scheduled for January 19th. Then, on January 24 - 26, OTC will meet at BWI airport to discuss the proposals. This work is being conducted in preparation for a meeting of the OTC Commissioners on February 22 in Washington, DC. The OTC workgroups are considering all of the initiatives already on the DC-region's priorities list. The workgroups have also begun to consider potential new regulatory initiatives focused on industrial coatings, adhesives and sealants, publicly-owned treatment works, auto-refinishing shops, asphalt facilities, printing and graphic arts operations, and metal finishing facilities. Jeff King said that at some point the TAC control measures workgroup needs to decide whether to add these new potential measures to the priorities list.

Jeff King then provided a briefing on work to estimate the emission reduction potential for the measures on our priorities list. He said that staff have been working closely with state air agency representatives to evaluate inventory files in an effort to develop estimates for the Distributed Generation Rule, the ICI boiler standards initiative, the MSW incineration RACT, and home heating oil standards. State air agency staff will review preliminary estimates before wider circulation.

Jeff King said he needs the controlled point source emissions estimates for 2009. He also asked for further clarification on the peaking unit measure being considered by OTC. Doris McLeod said that it's been difficult for this region to assess the emission reduction potential of the OTC initiatives given the lack of specific information about the proposals available at this time.

6. Stakeholder Nominations. Jim Sydnor discussed stakeholder nominations for 2006. He said that all four of the current stakeholders submitted applications to serve again in 2006. He expressed appreciation for all of their efforts and said that a proposal to appoint the four stakeholder participants was approved by the Executive Committee. He said that letters will be sent to the stakeholders. Jim Sydnor said that some concerns have been raised about the use of company email accounts to handle committee correspondence. Kipp Coddington and Flint Webb both said that they understand and could make personal email accounts available to staff.

7. Subcommittee Rotations. Joan Rohlf's said that only one comment was received on the chair rotation proposal from December. She said that Virginia asked to remain the Chair of the Attainment Modeling Subcommittee. She asked whether Brian Hug from MDE would be willing to chair the Emissions Inventory Subcommittee. Brian Hug said that he thought that the District was doing a good job in this capacity, but that he could handle the assignment if needed. Joan Rohlf's said that the District would then be asked to chair the Conformity Subcommittee. She said that a meeting of the Emissions Inventory Subcommittee is needed to set priorities for the mobile sector. Brian and Joan agreed to set up a conference call for January 19th.

Tad Aburn expressed some concern about the chair of the Conformity Subcommittee. He was under the impression that Montgomery County would have this assignment. He asked that the rotation proposal be discussed with the MWAQC Executive Committee. Flint Webb said he was concerned that the District would be allowed to chair the Conformity Subcommittee every third year, and that such a system may be unfair to the jurisdictions in Virginia and Maryland. He said that while he can support the system for this year, he doesn't believe the rotation should be codified. Tad Aburn said that it is important that there is no perception that the local jurisdictions don't have a role in the subcommittee process. Ram Tangirala asked how the TPB subcommittee rotations work. Mike Clifford said that the committee lead rotates between the three states. If it's Maryland or Virginia's turn, either a state or local representative can be appointed. In response to a question from Jim Sydnor, Mike Clifford said that Rick Canizales from Prince William County is currently the chair of the TPB Technical Committee. Howard Simons said that it was agreed that the rotation could include the District as a local jurisdiction. He also said that it's important that the rotation not be mandated. He suggested that it be considered right of first refusal. Jim Sydnor agreed, and said he was aware of the concerns being raised. He said that the proposal should be brought before the MWAQC Executive Committee and that the rotation scheme could be reevaluated at the end of the year.

8. State and Local Air Agency Report. Stan Tracey said that air agency staff are evaluating the requirements for implementing CAIR in the District. He said that he hopes the necessary regulations will be in place before September. Tad Aburn reported that MDE staff are busy working on CAIR, the Clean Power Rule, NSR reform, and mercury regulations. He suggested that a group be formed to discuss a broad regional program based on the Clean Power Rule.

Jim Sydnor asked about potential concerns about a Virginia legislative proposal to exempt new vehicles from emission inspection requirements. The District is concerned about this proposal, unless it is done as a regional initiative, according to Ram Tangirala. He said that it is a throughput issue and that modern on-board diagnostics be considered. Jim Sydnor said that he has heard that shops are concerned about potential loss of revenue. Flint Webb said that the proposal may make sense based on cost effectiveness and suggested that the safety inspection process be used to detect potential tampering with emission control devices. Jim Sydnor said that remote sensing could be used to identify high emitting new vehicles if the proposal was adopted. Jim Ponticello said that in Virginia there is an inspection/maintenance as well as an anti-tampering program. He said that it's possible to have the tampering concern addressed through the safety inspection. Howard Simons said that the Vehicle Emission Inspection Program (VEIP) in Maryland exempts vehicles during the first two years. He said he was concerned that if the proposal extends the exemption to four years, there may be implications for the SIP.

Flint Webb asked for an update about the Mirant Potomac River power plant. Jim Sydnor said that DOE ordered the plant into operation due to concerns about grid reliability during line maintenance shutdowns. He said that there are controls installed on only one unit at the plant. He said that the Commonwealth of Virginia does not have much authority to address the current situation given the recent federal involvement. In response to questions from Flint Webb, Jim Sydnor said that the concerns are based on modeled exceedances. He said that the facility has 30 days to prepare a plan to demonstrate that it will

not cause exceedances when operating under worse case meteorological conditions. In response to Flint's questions, Jim Sydnor also said that the situation could be eligible for a Title V citizen's suit.

9. Set Date for Next Meeting, Future Agenda Items, Adjourn: February 10, 2006

The TAC will meet next on February 10, 2006 from 10am to noon. There being no further business, the meeting was adjourned at 11:40 am.