

From Tom Ballou Email Dated January 6, 2006

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Provided below is a summary of the December 7th DC ozone attainment modeling call. I would like to elaborate on the 2009 future base case scenarios that we discussed and are proposing to run as the next step in the modeling process. Under this proposed plan, there will be three future base case scenarios run to evaluate the impacts of various OTB/OTW control programs (mainly utility controls). These scenarios are briefly described below:

Future Base Case #1 (OTC Base Case Scenario) – This is the future base case currently being run by the OTC. The assumption (per Tad) is that the controls included in this scenario for MD power plants are equivalent or at least similar to the implementation of the CPR. The modeling results from this scenario should be available by mid-January.

Adjusted Future Base Case #1 (Current Control Scenario) – This scenario will represent base year (2002) utility emissions levels & controls plus growth. This scenario would not include the MD Clean Power Rule (CAIR) or VA CAIR controls. Comparison of this scenario to the OTC Base Case will allow us to estimate the benefits of the implementation of the MD CPR. The VADEQ will perform this modeling run.

Adjusted Future Base Case #2 (Future Control Scenario) – This scenario will represent the implementation of both the MD CPR and the VA CAIR emission reduction strategies. It will also include the reduction in VA anticipated from the implementation of the NOX SIP Call Phase II requirements. The VADEQ will perform this modeling run.

One remaining uncertainty concerning this plan is the status of the previous OTC VOC rules in Northern Virginia. It is unclear as to whether these controls are included in the OTC future base case scenario. We are currently looking into this issue and may recommend that these reductions also be added to Adjusted Future Base Case #2 if they are not already included in the OTC Base Case.

Finally, we need any updated utility emissions projection data from DC and MD immediately if they are to be included in this modeling. We currently have 2009 uncontrolled and controlled emissions from MD used in our previous analysis that can be used for this purpose, if they are still valid. These previous projections are attached.

Barring any unforeseen problems, we anticipate that all the future base case modeling and results as described above will be completed no later than the third week in February.

The other items discussed as action items during this call are as follows:

- ASIP Sensitivity Runs – We currently have a presentation on these runs developed by GA which provides great deal of data but little substance in terms of describing the sensitivity runs in detail. We are checking to see if more details will be provided before determining how to present this data to the group.
- Winter/Summer Modeling for PM2.5 – We are currently evaluating the 2002 PM2.5 data for the DC MSA and will be recommending PM2.5 episodes in the near future. These recommendations will be provided to the group for the review and approval. We will then move forward with this modeling exercise.
- OTC CALGRID Analyses – The group will collectively continue to follow and review the ongoing OTC CALGRID control measure screening analyses to the extent that they provide additional insight as to the benefits of various future control measures and strategies.
- Future Control Case Modeling – We need to begin thinking about the sequence and content of the control case modeling once the future base case work is done. As previously proposed, the group should select one of the summer episodes to perform the iterative control case modeling to save time and resources. We will make a recommendation on which episode to us for the group’s approval prior to the start of this modeling. The final attainment demonstration modeling would then be run for the entire five month ozone season.

Please review and provide comments on this plan as soon as possible. It may also be useful to discuss this briefly during the TAC meeting next Thursday (1/12).

Thank you for your continued assistance in this effort.

Thomas R. Ballou

Director, Office of Air Data Analysis

VA Department of Environmental Quality

(804) 698-4406