

DRAFT

**MWAQC Technical Advisory Committee
Conference Call Summary
July 13, 2007 9am to 10am**

Present:

Tad Aburn, Maryland Department of Environment
Olivia Achuko, District Department of Environment
Tom Ballou, Virginia Department of Environmental Quality
Cecily Beall, District Department of the Environment
Tom Biesiadny, Fairfax County Department of Transportation
Randy Carroll, Maryland Department of Environment
Bhesh Dhamala, Fairfax County Department of Health
Deirdre Elvis-Peterson, District Department of the Environment
Thomas Foster, Virginia Department of Environmental Quality
Diane Franks, Maryland Department of Environment
Brian Hug, Maryland Department of Environment
Maurice Keys, District Department of Transportation
Sonya Lewis-Cheatham, Virginia Department of Environmental Quality
Doris McLeod, Virginia Department of Environmental Quality
Bob Owolabi, Fairfax County Department of Transportation
Mark Rawlings, District Department of Transportation
Bill Skrabak, City of Alexandria
Howard Simons, Maryland Department of Transportation
JoAnne Sorenson, Virginia Department of Transportation
Kanti Srikanth, Virginia Department of Transportation
Jim Sydnor, Virginia Department of Environmental Quality
Chris Voigt, Virginia Department of Transportation
Marcia Ways, Maryland Department of Environment
Flint Webb, Fairfax County Federation of Citizens Associations

Staff:

Stuart Freudberg, COG/DEP
Jeff King, COG/DEP
Ron Kirby, COG/DTP
Sunil Kumar, COG/DEP
Erin Morrow, COG/DTP
Joan Rohlfs, COG/DEP
Daivamani Sivasailam, COG/DTP

Observers/Participants:

Linda Miller, EPA Region III

1. PM_{2.5} SIP Planning Options

Joan Rohlf's said the purpose of the call is to follow up on the request made at the July 9 TAC to hold a special call to discuss PM SIP planning options. She introduced Linda Miller from EPA Region III and asked her to discuss issues related to redesignation requests and EPA's Clean Data Policy.

Linda Miller said that if based on a letter request to EPA the region receives a determination of attainment, SIP planning requirements are suspended. The region would then prepare an official redesignation request and prepare a maintenance plan instead of an Attainment SIP. She said the ozone Clean Data Policy may be affected by pending litigation. The EPA Calcagni memo which provides guidance on suspension of planning requirements associated with a request for redesignation is not subject to the litigation. If the region submits a redesignation request before the SIP is due in April, the region would not be required to prepare an attainment SIP.

Bill Skrabak said that the City of Alexandria believes that based on modeling and local monitoring there are local exceedances of the NAAQS caused by emissions from the Mirant Potomac River Generating Station. The Design Value for the region is so close to the standard that any additional local emission hot spots will likely cause exceedances. The City considers a request for an Attainment Determination inappropriate at this time. The City understood that local hotspots would be addressed as part of the Attainment SIP process. The City is also concerned that if the region is designated as attainment, NSR offset requirements would no longer be required. PSD permitting is not as stringent as NSR. He also said that Mirant is proposing stack merges and raising the stack height which could cause new air quality problems across a broader area, including the District of Columbia. The plant is also using Trona injection which could increase PM_{2.5} direct concentrations in the vicinity of the plant.

Kanti Srikanth said that local hotspots should not be considered a SIP issue. Bill Skrabak said that both EPA and Virginia DEQ told the City of Alexandria that local hotspot issues related to the Potomac River power plant would be addressed during the SIP process. Linda Miller suggested that a lower emission limit could be put into the SIP even if the region is redesignated. She also said that controls could be required as part of a contingency plan. Jim Sydnor said that Virginia DEQ prefers to handle the hot-spot issues as part of the permitting process. Brian Hug and Tad Aburn said that Maryland supports any option, as long as new control programs are developed and an aggressive Maintenance Plan is developed to address the upcoming new lower daily standard and the litigation associated with the current annual standard. Doris McLeod said that one benefit of redesignating would be that there would be no need to develop a new NSR SIP and regulation for PM direct and the precursors SO₂ and NO_x.

Members discussed additional issues related to the decision on PM_{2.5} SIP planning options. Joan Rohlf's said that delaying the decision would cause issues with timing for completing necessary work products. She said that the region is on track to complete an Attainment SIP by April. Flint Webb expressed concern that under Virginia law, the SIP can't establish requirements that are more stringent than what is required under federal law. Stuart Freudberg asked for more information about the monitors installed by the City of Alexandria around the Mirant facility. Jim Sydnor said that the monitors are not properly located to be used for compliance determinations. Bill Skrabak said that the monitored readings suggest that the local plant is causing a local hotspot that results in ambient concentrations above the standard.

Members considered options for recommendations. Jim Sydnor suggested that the Clean Data Policy be used to suspend SIP requirements. Decisions about redesignation could be made at a later date once IAQC has a chance to deliberate. Joan Rohlf's said that the staff recommends proceeding with preparing an Attainment SIP. She suggested that two options be presented to MWAQC. One would be to continue to prepare and Attainment SIP. The other option would be to use the Clean Data Policy. Tad Aburn said that he'd prefer one recommendation and suggested a Virginia caucus.

Cecily Beall said that another call should be held on July 23 at 10 am to discuss the issues further.

DRAFT

**MWAQC Technical Advisory Committee
Conference Call Summary
July 23, 2007 10am to 11am**

Present:

Olivia Achuko, District Department of Environment
Tom Ballou, Virginia Department of Environmental Quality
Cecily Beall, District Department of the Environment
Randy Carroll, Maryland Department of Environment
Diane Franks, Maryland Department of Environment
Brian Hug, Maryland Department of Environment
Mike Kiss, Virginia Department of Environmental Quality
Jim Ponticello, Virginia Department of Transportation
Mark Rawlings, District Department of Transportation
Howard Simons, Maryland Department of Transportation
Walter Simms, Maryland Department of Environment
Kanti Srikanth, Virginia Department of Transportation
Roger Thunell, Maryland Department of Environment
Chris Voigt, Virginia Department of Transportation
Flint Webb, Fairfax County Federation of Citizens Associations

Staff:

Mike Clifford, COG/DTP
Jeff King, COG/DEP
Sunil Kumar, COG/DEP
Eulalie Lucas, COG/DTP
Joan Rohlfs, COG/DEP
Daivamani Sivasailam, COG/DTP

1. PM Precursor Significance Determinations

Cecily Beall asked that the significance determination for the VOC precursor be discussed further. She said that DCDOE staff are concerned about the lack of mobile and area source sector modeling results to support the decision. Tom Ballou and Mike Kiss said there is evidence that VOC is not strongly relevant, but the information is based mainly on point source analysis. Sunil Kumar said that while organics are highly prevalent in the speciation data, the principle sources are covered because direct PM_{2.5} was determined to be significant. He said that science is still very uncertain regarding the role of VOC in formation of secondary organics. Brian Hug said that VOC emissions are being controlled through the ozone SIP policy. Cecily Beall asked that a footnote be added to the determination documentation that VOC significance will be reevaluated again in the future as more data become available. Members agreed.

2. PM_{2.5} SIP Planning Options

Joan Rohlfs said that members agreed during the last call to hold additional discussion on PM_{2.5} SIP planning options. Members generally reviewed the issues affecting the decisions on which option to recommend and raised additional concerns related to the planning process.

Kanti Srikanth asked about the purpose or intent behind the letter sent by AQPAC. Joan Rohlfs said that AQPAC members are concerned about the future tougher daily standard and the belief that the annual standard of 15 ug/m³ is set too low. AQPAC is urging the preparation of an Attainment SIP and adoption of new measures to achieve levels below the current annual standard.

Flint Webb expressed concern that if the region is redesignated it may be difficult for Virginia to develop and implement new control programs given legislative restrictions. Tom Ballou said that decisions on potential new control programs will depend on the proposals.

Brian Hug said that because modeling results indicate that the Baltimore nonattainment area is not projected to be in attainment, and because Maryland intends to adopt new control programs statewide, Maryland would like to see other jurisdictions adopt new control programs. He said that delays in reaching a decision or developing new control programs won't help address the Baltimore nonattainment problem.

Tom Ballou proposed that the Clean Data Policy be used and that a decision on redesignation be made at a later date.

Kanti Srikanth said that a decision on a recommendation may not be possible because there are too many unresolved technical and policy issues.

Jeff King said that EPA suggested that it may be possible to prepare an Attainment SIP and then once that is submitted to prepare a Redesignation Request. Members agreed that such an approach would be an inefficient use of resources.

Other concerns raised by members included the impact of a delay in developing a recommendation on the SIP planning process and on control measure development; perception issues with the public; and additional burdens on work programs, especially if a maintenance plan approach is taken.

Joan Rohlfs said that a meeting has been scheduled for Wednesday July 25 for Virginia jurisdictions to caucus. Unless a decision is reached on a recommendation at that meeting, staff will present the available SIP Planning options to MWAQC for decision. The options that would be presented are: Option A: Continue planning activities to prepare an Attainment SIP due by April 5, 2008, or Option B: Submit a letter request for an Attainment Determination under EPA's Clean Data Policy. Make a decision about Attainment SIP or Redesignation Request/Maintenance Plan at a later date. Members agreed.