

Metropolitan Washington Air Quality Committee

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TECHNICAL ADVISORY COMMITTEE

Date: December 9, 2005

Time: **10am to noon**

Lunch will be served to members at noon.

Place: **COG Training Center, 1st Floor**

MWCOG, 777 North Capitol St., NE, #300

Washington, D.C. 20002

Agenda

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- 10:00 1. Call to Order and Review of Meeting Summary (November 18, 2005)**
Chairman Tad Aburn, Maryland Department of the Environment
- 10:10 2. SIP Schedule: Update**
Joan Rohlfs, COG DEP, will present a revised SIP planning schedule.
- 10:20 3. PM2.5 Conformity: Comment Letter**
Bill Skrabak, City of Alexandria, will present a draft comment letter addressing the recently released conformity determination for PM2.5.
- 10:35 4. Emission Inventory: Update**
Ram Tangirala, DCDOH, will provide an update on emission inventory development.
- 10:50 5. Attainment Modeling: Control Strategies for Future Case Runs**
Jeff King, COG DEP, will present a draft control strategy template for use in handling future case attainment modeling runs.
- 11:20 6. Subcommittee Structure**
Ram Tangirala, DCDOH, will present proposed changes to the TAC subcommittee structure.
- 11:35 7. Stakeholder Nomination Process**
Joan Rohlfs, COG DEP, will discuss the stakeholder nomination process for 2006.
- 11:45 8. State and Local Air Agency Report**
- 11:55 9. Set Date for Next Meeting, Future Agenda Items, Adjourn:**
Next TAC Meeting: January 12, 2005

DRAFT

MWAQC Technical Advisory Committee Meeting Summary November 18, 2005 Noon to 2pm. Rooms 4/5

Present:

Tad Aburn, Maryland Department of Environment
Rick Canizales, Prince William County Department of Public Works
Randy Carroll, Maryland Department of Environment
Kipp Coddington, Greater Washington Board of Trade
Karlyn Domnitch, Virginia Department of Transportation
Maurice Keys, District of Columbia Department of Transportation
Jeff Harn, Arlington County Department of Environmental Services
Alex Hekimian, Maryland National Capital Parks and Planning Commission
Sonya Lewis-Cheatam, Virginia Department of Environmental Quality (by videoconference)
Doris McLeod, Virginia Department of Environmental Quality (by videoconference)
Chris Meoli, Virginia Department of Environmental Quality
Deidre Elvis-Peterson, District of Columbia Department of Health
Jim Ponticello, Virginia Department of Transportation
Mary Richmond, Montgomery County Department of Environmental Protection
Howard Simons, Maryland Department of Transportation
Bill Skrabak, Alexandria Department of Environment Quality
Arnold Solomon, Mirant Mid-Atlantic
Jim Sydnor, Virginia Department of Environmental Quality (by videoconference)
Ram Tangirala, District of Columbia Department of Health
Stan Tracey, District of Columbia Department of Health
Didian Tsongwain, Prince George's County Department of Environmental Resources
Carl Winstead, Fairfax County Department of Transportation
Mike Zamore, Maryland National Capital Parks and Planning Commission

Staff:

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

Observers:

Charley Baummer, Metropolitan Washington Airports Authority
Gary Koerber, U.S. Department of the Navy Regional Environmental Coordinator Region III
Julie Crenshaw, Air Quality Public Advisory Committee (AQPAC)
Jill Engel-Cox, Air Quality Public Advisory Committee (AQPAC)
Debra Jacobson, George Washington University Law School
Sara Tomlinson, Baltimore Metropolitan Council

1. Call to Order

Mr. Aburn called the meeting to order at 12:15. The minutes of the October 14, 2005 meeting were approved with no changes. Alex Hekimian announced that this would be his last TAC meeting. The committee expressed its appreciation for his longstanding contribution, having served since TAC's inception.

2. Conformity Assessment for PM_{2.5}

Mike Clifford, COG DTP, provided the draft results of the conformity analysis for PM_{2.5} for the 2005 CLRP and 2006-2011 TIP. He said that the analysis is based on methods and inputs agreed upon during the interagency consultation process. The analysis will be a supplement to the recently approved conformity determination for 8-hour ozone. The PM analysis differs from the ozone determination in that the PM analysis is based on aggregating seasonal emissions into an annual total. In addition, the PM analysis also includes direct PM_{2.5} emissions as well as the NO_x precursor. COG/TPB staff, in conjunction with COG Department of Environmental Programs staff and with the consultant assistance of E.H. Pechan and Associates, developed the PM_{2.5} direct and NO_x precursor motor vehicle emissions factors through the use of EPA's MOBILE6.2 emissions factor model. Emission factors were developed using seasonal average daily minimum/maximum temperatures and associated default humidity values. The analysis uses COG's Round 7.0 Cooperative Forecasts and TPB's Version 2.1D #50 travel demand model. Because there are no mobile source emissions budgets for fine particles at this point, the relevant emissions test is that direct PM_{2.5} and NO_x precursor emissions in each plan and program action scenario (forecast year) are not greater than base year 2002 emissions. Mike Clifford provided summary tables indicating that this criterion is met for each analysis year. He said the draft results have been released for public comment and the TPB is scheduled to take action on the analysis in December.

Sunil Kumar asked why the emissions, after a significant decline between 2002 and 2020, begin to increase after 2020. Mike Clifford said this is because increases in vehicle miles traveled begin to offset the declines in emission rates after 2020. Howard Simons asked why the NO_x emission factor is flat after 2020. Mike Clifford said that after 2020, the MOBILE6.2 model predicts that vehicle technology will not improve as significantly as in the earlier years of the analysis. Maurice Keys asked about the implications of the results for future conformity analyses. Jim Ponticello said that this is an interim analysis and that new PM_{2.5} budgets will be established. Joan Rohlf said that the MANE-VU inventory results are similar to the emissions estimates in this analysis. DTP staff requested more information on the methods and results of the MANE-VU work. The committee agreed to have the Conformity Subcommittee consider drafting an MWAQC comment letter.

3. SCC Top Ten Sources

Sunil Kumar, COG DEP, presented summary tables with emission source rankings that can be used to focus in on important PM_{2.5} sources. The largest source of NO_x emissions are power plants and on-road vehicles. The largest source of VOC emissions are highway vehicles, gasoline distribution, and solvent use. The largest source of ammonia emissions are on-road vehicles. The largest source of SO₂ emissions are power plants. The largest source of PM_{2.5} direct emissions are open burning and stationary source fuel combustion. Howard Simons asked if the PM_{2.5} direct emissions values for paved roads includes dust and tire wear. Sunil said that it does not include tire wear. Ram Tangirala and Bill Skrabak asked staff to investigate the values presented for ammonia, particularly for open burning.

Ram Tangirala said that the emission inventories need to be finalized, especially in light of EPA's second phase guidance which will require the SIP inventories to be submitted to EPA in June 2006. He said that MDE still needs to approve various MOBILE6.2 inputs so that the inventory can be completed.

4. Control Measures Report/Workshop Summary

Jeff King, COG DEP, provided updates on the control measures workshop and the process for assessing Reasonably Available Control Measures (RACM) for the 8-hour ozone SIP. He said the control measures workgroup met recently to discuss criteria to assess RACM. Measures would be considered RACM only if they could advance the attainment date by one year, are technically and economically feasible, cause no adverse impacts, are not *de minimis*, and are enforceable. Jim Ponticello said the memorandum needs to be revised by adding a bullet that emphasizes the point that a measure must advance the attainment date by one year to be considered RACM. Jeff King said that each of the criteria will be assessed for each measure on the master list. A preliminary assessment of RACM will be circulated to the control measures workgroup next month.

Jeff King also summarized a recent MWAQC Control Measures workshop, chaired by Nancy Floreen and held on October 26 at COG. The meeting was attended by local officials, staff, members of AQPAC, and some stakeholders. At the workshop, Joan Rohlf's provided an assessment of whether new control measures will be needed. This was based on work from July which showed that while the region expects existing on-the-books and on-the-way measures to continue to provide substantial reductions, further reductions will likely be needed. At the meeting, Jeff King provided an overview of the OTC priority measures. He identified the measures being considered and the timing for implementing model rules for action within the OTR. The meeting then broke up into workgroup sessions. The sessions were: Stationary Sources; Transportation; Energy Efficiency and Renewable Energy; and Environmental Best Practices. Each session was 30 minutes, so the groups were unable to go into great depth or attempt to comprehensively consider a range of issues. The groups were asked to develop a list of 2-3 recommendations or priorities. Jeff King reviewed the list of recommendations from each workgroup. Highlights include environmental performance contracting (e.g., solar schools), mandatory diesel retrofit legislation in New Jersey, and Green Power purchasing.

Kipp Coddington asked if the New Jersey legislation targeted public or private fleets. Jeff King said the new law targets both public and private as well as on- and off-road equipment. He said the law phases in requirements over time, with public fleets being targeted in the early stages. Tad Aburn said that he would like to see more detailed emission reduction and cost estimates for the priority list by the end of the year to support the future case modeling.

5. SIP Planning: Update

Joan Rohlf's, COG DEP, discussed the recently released Phase 2 of the 8-hour Ozone Implementation Rule. Phase 1 of the guidance, released in April 2004 and effective June 15, 2004, designated the area as moderate nonattainment with a maximum of six years to attain. This means that the attainment date is June 15, 2010. In order to demonstrate attainment, the region must have all measures in place before the last complete ozone season prior to the attainment date. Attainment therefore must be demonstrated by the end of the 2009 ozone season.

The second phase guidance answered several planning questions. The region must demonstrate Reasonable Further Progress and assess Reasonably Available Control Measures (RACM). RACT and NSR also apply. Contingency measures will be required. Attainment modeling guidance was also provided. Howard Simons clarified that if the RACM criteria includes a requirement that a measure advance the attainment date by one year, this means that to be considered RACM, a measure must, when considered collectively with other measures, advance the region's attainment date to the end of the 2008 ozone season. In response to a question from Howard Simons, Joan confirmed that the RFP requirement would mean that 2008 budgets would be established for transportation conformity.

Joan Rohlf's said that the PM_{2.5} implementation guidance was also recently proposed. The planning dates for PM_{2.5} are close to the timeline for 8-hour ozone. The attainment date for PM is 2010. The PM SIP is due in April 2008. The state air agencies must decide on which precursors to include in the plan.

Currently the PM SIP must only address PM direct and the precursors SO₂ and NO_x (unless the state determines that NO_x is not a significant contributor). The other precursors to be considered are ammonia and VOCs.

Howard Simons asked about whether an extension was possible for the 8-hour ozone attainment. Joan Rohlf said that the guidance does allow the region to request a bump-up. Such a voluntary bump-up would entail no new requirements but would extend the attainment date and would mean the region would be designated as serious nonattainment, with associated political ramifications.

8. State and Local Air Agency Report

Virginia DEQ reported that the Mirant Potomac River Power Plant has started TRONA testing to control SO₂ and is still operating one unit in a cycling mode. Bill Skrabak said that the use of TRONA may increase particle emissions. Arnold Solomon said that test data demonstrate that this may not be a problem. Jim Sydnor also reported that the Air Pollution Control Board will be considering the proposed CAIR and CAMR rules in early December, with public hearings in the spring. Stan Tracey said that the DC Council approved the creation of a new Department of Environmental Protection in the District, which may be operational in about six months.

Tad Aburn said that the state of Maryland is proposing a new Clean Power Rule which will require significant reductions in emissions of both SO₂ and NO_x by 2010. The rule will result in installation of SCRs and scrubbers on all of the large units in Maryland. The state expects a nearly 70 percent reduction in NO_x emissions and an 85 percent reduction in SO₂ emissions. The rule will not allow utilities to trade allowances. Tad said that reductions resulting from this program provide the greatest level of emission reductions in Maryland compared to all other programs implemented to date.

Alex Hekimian said that while the new rule is a step in the right direction, he asked why the rule does not include more timely provisions for control of mercury emissions. This toxic pollutant is a serious risk to children and the elderly. Tad Aburn said that the timing is driven by the federal rule, and that a 70 percent reduction by 2010 is going to be very challenging. He said that the state needs to study mercury control between now and 2012, and that the second phase compliance date could be moved up if effective controls are identified. Mary Richmond asked whether the Maryland Clean Power Rule would result in more controls than required by the Mirant Consent Decree. Arnold Solomon said that the controls being installed to comply with the Consent Decree should be sufficient to meet the requirements of the rule. He said that 2010 is a very aggressive timeline. Mirant plans to spend more than \$500 million to install 5 scrubbers and 3 SCR units and construction within 5 years will be difficult. Tad Aburn said that the state estimates that more than \$1 billion will need to be spent in the next 5 years under the requirements of the rule.

Ram Tangirala asked when Maryland would provide its estimates of the controlled point source emissions for 2009. Tad Aburn said that once the rule is made public, MDE can provide the projected emissions. Mary Richmond asked why a legislative approach was not chosen. Tad said that it's because MDE already has the authority to regulate this sector. Stan Tracey asked whether the Maryland legislature has to approve the rule. Tad said that there is a committee that will review the rule. In response to a question from Alex Hekimian and Howard Simons, Tad Aburn said that this rule is an attainment strategy that fits in well under the OTC CAIR Plus initiative.

9. Set Date for Next Meeting, Future Agenda Items, Adjourn: December 9, 2005

The TAC will meet next on December 9, 2005 from 10am to noon. There being no further business, the meeting was adjourned at 1:55 p.m.