

JAN 10 2006

*INTERSTATE AIR QUALITY COUNCIL*

District of Columbia Department of Health  
District of Columbia Department of Transportation  
Maryland Department of the Environment  
Maryland Department of Transportation  
Virginia Department of Environmental Quality  
Virginia Department of Transportation

The Honorable T. Dana Kauffman  
Chair, Metropolitan Washington Air Quality Committee  
777 North Capitol Street, N.E., Suite 300  
Washington DC 20002-4239

Dear Chairman Kauffman:

The purpose of this letter is to thank MWAQC for the effective effort in 2005 to move the region further in the direction of cleaner air. Specifically, the 2005 focus on the technical work needed to support the planning process will pay large dividends in 2006 as we work through the key policy decisions that are needed. We also wanted to provide you with an update on the Interstate Air Quality Committee (IAQC) activities to reduce transport into the Washington region and to provide you with a schedule and a list of key products that will be needed in 2006.

Attachment 1 is a short summary of the activities that the IAQC has undertaken to reduce transport into the Washington DC nonattainment area. Two of these activities, tougher regional controls on power plants and new multi-state control measures for mobile, area and point sources, are being developed through the Ozone Transport Commission (OTC) process. The District of Columbia, Maryland and Virginia are members of the OTC, and Virginia and Maryland now sit on the OTC Executive Committee. Maryland chairs the OTC Multi-Pollutant Workgroup. The other IAQC transport initiative is evaluating opportunities to level the playing field and expand some of the existing control programs in the Washington area into upwind counties.

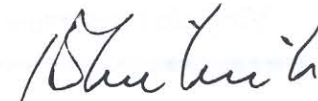
Attachment 2 includes a list of key analyses and reports that will be needed in 2006 and a schedule that summarizes critical dates for the 8-hour ozone and fine particle planning processes. The IAQC staff continues to work with the MWAQC staff on the 2006 work program and funding.

The Honorable T. Dana Kauffman  
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The IAQC continues to work on a Regional Allocation Study. This study is designed to evaluate different approaches for allocating emission reduction responsibilities as part of the SIP and TIP processes.

We look forward to continuing the effective partnership with MWAQC and hope that the progress that we have worked so hard to achieve over the past few years continues.

Very truly yours,



Kendl P. Philbrick, Chair  
Interstate Air Quality Council

Attachments

cc: MWAQC Vice Chairs  
Interstate Air Quality Council

## Attachment 1

### Brief Summary of IAQC Activities to Reduce Air Pollution Transport Into the Washington DC Nonattainment Area

#### Overview

Over the past year, the Interstate Air Quality Council (IAQC), has worked on three distinct initiatives to reduce transport into the Washington, D.C. area. Two of these initiatives, tougher regional controls on power plants and new multi-state control measures for mobile, area and point sources are being developed through the Ozone Transport Commission (OTC) process.

The District of Columbia, Maryland and Virginia are members of the OTC, and Virginia and Maryland now sit on the OTC Executive Committee. Maryland chairs the OTC Multi-Pollutant Workgroup. The other IAQC transport initiative is evaluating opportunities to level the playing field and expand some of the control programs already being implemented in the Washington D.C. area into upwind counties with less aggressive regulatory requirements.

#### OTC Activities – CAIR Plus

Maryland chairs the OTC Multi-Pollutant Committee, which is working on a “CAIR Plus” program to analyze, and if needed, adopt a model rule to further reduce emissions from power plants. Earlier this year, EPA adopted the Clean Air Interstate Rule (CAIR) to reduce transport across the Eastern United States. Several analyses indicate that CAIR may not provide enough reductions for areas like Washington to attain the ozone and fine particle standards. The power plant control piece of CAIR Plus will be proposed and discussed at the OTC special meeting in February. OTC’s current schedule calls for the Commission to, if needed, adopt a model rule for the additional power plant controls at the Spring meeting in June of 2006.

The OTC CAIR Plus effort also involves the development of new control measures for other sources like manufacturers, cars, trucks and consumer products. Table 1 lists the measures that are currently being evaluated by OTC.

The new measures will be implemented across the OTC region (Northern Virginia to Maine) and will provide both local benefits and reductions in transport from one region into another.

#### Upwind County Initiative

The IAQC has also been evaluating whether there are opportunities to implement some of the existing regulatory programs that are already in place in the Washington nonattainment area in counties that are upwind and contribute to the Washington areas nonattainment problem.

### *Maryland*

Maryland already implements many control programs statewide. Table 2 lists the Maryland measures that are already being implemented statewide.

New “upwind county “ control initiatives in Maryland include airport controls, regional fuels, updated RACT, a distributed generation regulation, reduced sulfur heating oil, enhanced open burning regulations and a second phase for the AIM and consumer products regulations. Maryland will implement any of the OTC control measures that are adopted across the entire state.

### *Virginia*

Table 3 describes the regulations that Virginia plans to expand into new areas and the regulations that Virginia is considering for expansion into various areas.

### *District of Columbia*

The District of Columbia is not part of the upwind county initiative, but supports the statewide efforts in Maryland and Virginia to ensure regional consistency. The District already implemented various measures listed in Table 4.

TABLE 1

ADDITIONAL MEASURES UNDER CONSIDERATION AT OTC

<b>Mobile Sources</b>	<b>Stationary “Smokestack” Sources</b>	<b>Smaller, Diverse “Area” Sources</b>
Diesel Retrofit Program	Smaller Boilers	Phase 2 Consumer Products
Truck Stop Idling Program	Peaking Unit Initiative	Phase 2 Reformulated Paint
The OTC I-95 Corridor Initiative	Cement/Lime Kilns	Open Burning
OTC –Wide Regional Fuel	Municipal Waste Combustors	Residential Wood Burning
Voluntary Measures “Bundle”	Refineries	Cutback Asphalt
Off-Road Equipment Fuel	Glass Furnaces	Small Diesel Generators
	Industrial/Commercial/Institutional Boilers	Residential Fuel Oil

TABLE 2

MEASURES ALREADY BEING IMPLEMENTED "STATEWIDE" IN MARYLAND

Control Measure Name	
New Source Review	Yeast Manufacturing
RACT	Lithographic Printing
OTC Fuel Container Rule	Coil Coating
OTC AIM	Can Coating
OTC Consumer Products	Commercial Bakery Ovens
Automotive and Light-Duty Truck Coating	Vinegar Generators
Bread and Snack Food Drying Operations	Vehicle Refinishing
Explosives and Propellant Manufacturing	Leather Coating
Large Appliance Coating	Distilled Facilities
Paper, Fabric, Vinyl, and Other Plastic Parts Coating	Reinforced Plastic Manufacturing
Solid Resin Decorative Surface Manufacturing	Marine Vessel Coating Operations
Expandable Polystyrene Operations	Metal Furniture Coating
Cold and Vapor Degreasing	VOC Equipment Leaks
Flexographic and Rotogravure Printing	Organic Chemical Production
Landfill Gas Emissions from Municipal Solid Waste Landfills	Dry Cleaning Installations
Screen Printing and Digital Imaging	Miscellaneous Metal Coating
Structural Steel Coating Operations	Aerospace Coating Operations
Manufacture of Synthesized Pharmaceutical Products	Brake Shoe Coating Operations
Paint, Resin and Adhesive Manufacturing and Adhesive Application	

TABLE 3

CONTROLS IN UPWIND COUNTIES IN VIRGINIA

<b>County/City</b>	<b>Regulation</b>	<b>Status</b>
City of Fredericksburg County of Spotsylvania	OTC Fuel Container Rule OTC AIM Rule OTC Consumer Products Stage I Vapor Recovery CTG Solvent Degreasing OTC Autobody Refinishing CTG VOC RACT Rules Open Burning Restrictions	Commitment made for redesignation request of the area.
County of Roanoke County of Botetourt City of Roanoke City of Salem	CTG VOC RACT Rules NOx RACT Open Burning Restrictions Air Quality Action Day	Commitment made for early action compact classification deferral.
City of Winchester Frederick County	Open Burning Restrictions Air Quality Action Day Idling Restrictions	Commitment made for early action compact classification deferral.
County of Gloucester County of Isle of Wight County of Prince George City of Petersburg	Open Burning Restrictions CTG VOC RACT Stage I Vapor Recovery	Being reviewed as part of redesignation request and maintenance plan analysis.
County of Prince George County of Chesterfield County of Hanover County of Henrico County of Charles City City of Hopewell City of Colonial Heights City of Richmond City of Petersburg	OTC Fuel Container Rule OTC AIM Rule OTC Consumer Products CTG Solvent Degreasing OTC Autobody Refinishing	Being reviewed as part of a commitment in a bump down request and also as part of a redesignation request and maintenance plan analysis.

TABLE 4

EXISTING MEASURES IN THE DISTRICT OF COLUMBIA

Control Measure Name
New Source Review
RACT
OTC Fuel Container Rule
OTC AIM
OTC Consumer Products
Stage I Refueling controls
Stage II controls
RFG
Solvent Degreasing Rule
Dry Cleaning Rule
Autobody Refinishing Rule
Printing Regulations
Bakery Emission Rule
Enhanced I/M Program
Open Burning Ban
Anti-Idling Enforcement



Attachment 2

SUMMARY OF REPORTS – 2006

February - Final Ozone Control Measure Report

March – 8-Hour Ozone Base Case Emissions Inventory Document

April – Updated RFP Calculations Report for Ozone (formerly referred to as ROP)

June – Draft 8-Hour Ozone Air Quality Plan

August - Revised 8-Hour Ozone Air Quality Plan

October – Response to Public Comment, Report on PM2.5 Co-Benefits of Ozone Controls

December – Recommended 8-hour Ozone Air Quality Plan

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**Final Ozone Control Measure Report** – Summarizes potential individual control strategies including emission reduction estimates, brief write-up of strategy, adoption schedule (if selected), multi-pollutant co-benefits and available cost-effectiveness information.

**8-Hour Ozone Base Case Emissions Inventory Document** – Summarizes inventory inputs as processed for ozone modeling.

**Updated RFP Calculations Report for Ozone** – Using selected control strategies and EPA Phase II implementation guidance, update ROP/RFP calculations for inclusion in the draft air quality plan.

**Draft 8-Hour Ozone Air Quality Plan** - Summarizes and documents progress made in developing base-year, ROP/RFP and attainment (modeling) inventories, photochemical modeling and weight of evidence analyses. This report should cover all of the base-year, projection and modeling inventory work and photochemical modeling completed or coordinated by TAC. It should identify selected control measures and preliminary adoption schedules. Templates may be available for generic parts of the air quality plan and the states will provide direction for their use.

**Revised 8-Hour Ozone Air Quality Plan** – Revise draft plan based upon comments received from TAC or MWAQC.

**Draft 8-hour Ozone SIP Template Report** – Provides a template for the 8-hour ozone/PM SIP. The template should insure that all requirements are covered in the document and provide generic text when appropriate.

**Response to Comments on Draft Ozone Plan** - Develop responses to comments received on the plan during the public comment process.

**Report on PM2.5 Co-Benefits of Ozone Controls** – Revise Final Control Measure Report to include PM2.5 reduction benefits for appropriate measures and add any potential control measures that provide PM2.5 benefits alone in the same format as the original control measure write-ups.

**Recommended 8-Hour Ozone Air Quality Plan** – Final plan recommended by MWAQC and including modifications agreed upon in response to public comment.

Attachment 2 (Cont.)

OZONE AND PM2.5 PLANNING SCHEDULE

<u>Task</u>	<u>Deadline</u>
January 2006	Selection of Control Scenarios for Ozone Modeling
February 2006	<b>MWAQC Meeting</b>
March 2006	Future Case Modeling Run Results for Ozone, Public Hearing on 2002 Base Case 8-Hour Emissions Inventory
April 2006	<b>MWAQC Meeting</b> ; Selection of Final Ozone Control Measures, Discussion of WOE for Ozone Plan
May 2006	<b>MWAQC Work Session</b> ; Development of 8-Hr Mobile Budgets for Ozone
June 2006	<b>MWAQC Meeting; MWAQC Work Session</b> ; Draft Ozone Air Quality Plan
July 2006	<b>MWAQC Meeting; 8-Hr and PM Interim Conformity</b> ; TAC reviews draft Regional Ozone Air Quality Plan
August 2006	MWAQC reviews Regional Ozone Air Quality Plan
September 2006	<b>MWAQC Meeting; Public Comment, Hearings</b> ; Initial Review of Data for Significance of NH <sub>4</sub> , SO <sub>2</sub> , etc. for additional mobile budgets
October 2006	<b>MWAQC Work Session</b> ; Response to Public Comments
November 2006	<b>MWAQC Meeting</b> ; MWAQC approval
December 2006	Regional 8-Hr Ozone Air Quality Plan to IAQC