

# Metropolitan Washington Air Quality Committee

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## TECHNICAL ADVISORY COMMITTEE

Date: January 12, 2006

Time: **10am to 11:30am**

Place: **Conference Call (or DEP Conference Room, 3rd Floor)**

**Call-In Number: 888-898-8635**

**Passcode: 774715**

## Agenda

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- 10:00 1. Call to Order and Review of Meeting Summary (December 9, 2005)**  
*Chairman Jim Sydnor, Virginia Department of Environmental Quality*
- 10:10 2. Power Plant Regulations: Update**  
*Tad Aburn, MDE, and Jim Sydnor, Virginia DEQ, will provide an update on the status of the proposed Maryland Clean Power Rule and CAIR/CAMR Implementation Rules.*
- 10:25 3. Emission Inventory: Update**  
*Ram Tangirala, DCDOH, will provide an update on emission inventory development.*
- 10:40 4. Attainment Modeling Status Report**  
*Tom Ballou, Virginia DEQ, will provide an update on attainment modeling for the 8-hour ozone SIP.*
- 10:55 5. Control Measures: Update**  
*Jeff King, COG/DEP, will provide an update on control measures development.*
- 11:10 6. Stakeholder Nominations**  
*Joan Rohlfs, COG DEP, will discuss stakeholder nominations for 2006.*
- 11:20 7. State and Local Air Agency Report**
- 11:25 8. Set Date for Next Meeting, Future Agenda Items, Adjourn:**  
*Next TAC Meeting: February 10, 2006*

## **DRAFT**

### **MWAQC Technical Advisory Committee Meeting Summary December 9, 2005 10am to noon. COG Board Room**

#### **Present:**

Tad Aburn, Maryland Department of Environment (by teleconference)  
Tom Ballou, Virginia Department of Environmental Quality (by teleconference)  
Rick Canizales, Prince William County Department of Public Works (by teleconference)  
Randy Carroll, Maryland Department of Environment (by teleconference)  
Kipp Coddington, Greater Washington Board of Trade (by teleconference)  
Diane Franks, Maryland Department of Environment (by teleconference)  
Victoria Greenfield, Charles County  
Maurice Keys, District of Columbia Department of Transportation  
Jeff Harn, Arlington County Department of Environmental Services  
Sonya Lewis-Cheatam, Virginia Department of Environmental Quality (by teleconference)  
Doris McLeod, Virginia Department of Environmental Quality (by teleconference)  
Jim Ponticello, Virginia Department of Transportation (by teleconference)  
Howard Simons, Maryland Department of Transportation  
Bill Skrabak, Alexandria Department of Environment Quality  
Kanti Srikanth, Virginia Department of Transportation (by teleconference)  
Jim Sydnor, Virginia Department of Environmental Quality (by teleconference)  
Ram Tangirala, District of Columbia Department of Health (by teleconference)  
Julie Thomas, National Park Service (by teleconference)  
Flint Webb, Fairfax County Federation of Citizen's Associations  
Carl Winstead, Fairfax County Department of Transportation (by teleconference)  
Mike Zamore, Maryland National Capital Parks and Planning Commission

#### **Staff:**

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

#### **Observers:**

Charley Baummer, Metropolitan Washington Airports Authority  
Brian Holmes, Air Quality Public Advisory Committee (AQPAC) (by teleconference)  
Gary Koerber, U.S. Department of the Navy Regional Environmental Coordinator Region III

## **1. Call to Order**

Mr. Aburn called the meeting to order at 10:35. Due to inclement weather, some of the attendees participated by teleconference and the meeting start time was delayed. The minutes of the November 18, 2005 meeting were approved with no changes.

**2. SIP Schedule: Update.** Joan Rohlf's presented a revised SIP planning schedule, based in part on EPA's recently released phase II 8-hour ozone implementation guidance. The draft SIP is expected to be delivered to MWAQC in July 2006. Public hearings would then be held in July/August 2006. The SIP would then be approved in September 2006 for submittal to the IAQC. The SIP is due in June 2007. Additionally, one new requirement is that base year 2002 emission inventories will need to be submitted to EPA in June 2006. Also, the guidance provides information on including weight of evidence as part of the attainment demonstration. The dates for completing the draft SIP and holding public meetings were changed because certain control measures may be based on the work of the Ozone Transport Commission which does not expect to finalize model rules until June 2006.

Flint Webb asked how the SIP schedule compares to state legislative sessions. Doris McLeod and Tad Aburn said that the states are aware of potential timing issues, and that the specific impacts would depend on the measure. Joan Rohlf's said that the timing of the OTC process is also a concern. Certain measures may not be adopted until 2007, but there are SIP mechanisms that will accommodate such timing.

Kanti Srikanth asked about the timing of new mobile budgets for conformity purposes. Joan Rohlf's said that if the SIP is completed in the Fall, EPA will have 60 days to complete the adequacy determination. Howard Simons said that his understanding is that the next conformity cycle will be handled again using the interim emission test. In response to a question from Flint Webb, Kanti Srikanth said that the impacts of BRAC will be factored into the conformity analysis only if the Planning Directors approve the next round of Cooperative Forecasts reflecting the changes expected as a result of BRAC. He also said that COG DTP has conducted a preliminary evaluation of the impact of BRAC and determined that the emissions changes will be small.

**3. PM<sub>2.5</sub> Conformity: Comment Letter.** Bill Skrabak, City of Alexandria, began the discussion by asking Mike Clifford to provide an overview of the draft results of the conformity determination for PM<sub>2.5</sub> for the 2005 CLRP and 2006-2011 TIP, including recent changes. Mike Clifford said that he briefed the committee on the draft results in November at which time he indicated that the emissions in the milestone years are all below the 2002 emissions levels for both direct PM as well as the precursor NO<sub>x</sub>. In early December, the TPB Technical Committee released a memorandum that provided detail on several minor corrections to the November 16th analysis. School and transit buses were inadvertently left out of the totals resulting in an emissions impact of less than a 10th of a ton. He provided revised summary tables.

Bill Skrabak then said that the Conformity Subcommittee met and discussed preparing a draft comment letter for recommendation to MWAQC for transmittal to TPB. He said that the letter included several key points. The letter recognizes the results are based on comparing the estimated emissions to the interim 2002 Emissions Test. It also notes that the difference created by this fact is temporary given that new budgets are being developed as part of the SIP process. The letter also urges maintaining commitment to emission reduction measures reflecting the idea that meeting the new budgets may be challenging. The letter was approved with no changes.

**4. Emission Inventory: Update.** Ram Tangirala provided an update on emission inventory development. The Emission Inventory Subcommittee identified a new requirement through a recent meeting with EPA Region III. The region must submit the 2002 base year inventory for the SIP, including an annual inventory for ozone, by June 2006. The annual inventory must include all pollutants, including ammonia. The region must also prepare a Reasonable Further Progress inventory for 2008. Emissions inventories are still needed for the region's airports, for both 2002 and 2009. A decision is

needed on what mixing height to use for inventory development. Joan Rohlf's asked about the timing of the airports inventory. Charley Baummer said that he expects that URS will complete the work in January.

Ram Tangirala asked about the status of developing mobile sector inventories. Joan Rohlf's said that there is an upcoming call with the state air agencies to discuss monthly versus seasonal inventories. Kanti Srikanth asked if the call only includes state air agency officials. Joan Rohlf's and Ram Tangirala said that the state air agencies must coordinate their recommendation prior to discussion with TPB. The states have a larger inventory role that must be considered prior to handling inventory development at the regional level.

**5. Attainment Modeling: Control Strategies for Future Case Runs.** Jeff King presented a draft control strategy template for use in handling future case attainment modeling runs. He said that four or more control strategy scenarios for future case model runs are being considered for analysis in January. Scenario 1 would evaluate On-the-Books and On-the-Way Controls, including CAIR, with CAIR EGU controls based on either local inputs, IPM inputs, or state-level EGU rules. Scenario 2 would evaluate On-the-Books and On-the-Way Controls, including CAIR, plus additional VOC and NO<sub>x</sub> reductions from "new" local controls. Scenario 3 would evaluate On-the-Books and On-the-Way Controls, including CAIR, plus additional VOC and NO<sub>x</sub> reductions from "new" local controls, plus additional EGU controls (CAIR Plus). Scenario 4 would involve considering On-the-Books and On-the-Way Controls, including CAIR, plus additional VOC and NO<sub>x</sub> reductions from "new" local controls, plus additional EGU controls (CAIR Plus), plus additional area/mobile source controls across a broader region. Jeff King also provided a list of the proposed priority control measures grouped by applicable scenario.

Bill Skrabak and Flint Webb asked about the OTC municipal solid waste incineration RACT initiative. They asked if the regulations on incinerators in the region were already fairly stringent. Tad Aburn said the goal of the initiative is to address incinerator sources that are not located in nonattainment areas.

Howard Simons asked at what point will implementation decisions be made. Tad Aburn said that the OTC process will involve a special meeting of the Commissioners in February. Final model rules are expected in June 2006. After the model rules are developed, the states will develop regulations. The goal would be to have reductions begin in 2008, but it will vary by control measure. In response to a question from Flint Webb, Tad Aburn said that legislation will likely not be required to implement the model rules. States already have necessary statutory authority to promulgate new regulations. However, adoption of CAL LEV II would require new legislation.

Kanti Srikanth asked whether regulations need to be in place for three years for the SIP. Tad Aburn said that the regulations must be in place by May 2009 to be creditable, but that the attainment demonstration will be based on air monitoring data from 2007, 2008, and 2009. The comparison test will be based on three years of data, averaging the 4th highest observed 8-hour concentrations.

**6. Subcommittee Structure.** Ram Tangirala discussed proposed changes to the TAC subcommittee structure. He presented a memorandum that highlighted the recommendations that are intended to streamline the process and provide opportunity for different jurisdictions to take leadership roles on committees. First, the forecasting subcommittee would become part of the attainment modeling subcommittee. Second, the subcommittee leads would be rotated on an annual basis similar to the rotation for the TAC Chair. The Attainment Modeling and Emission Inventory Subcommittees would be chaired by state air agency representatives in alphabetical order (DC-MD-VA). The Conformity Subcommittee would rotate among the local jurisdictions, with the District of Columbia participating as a local jurisdiction. Ram Tangirala said that the proposed changes have the support of the IAQC. Howard Simons asked what would happen if the committee wanted the same Chair to continue. Ram Tangirala said that the process could be flexible. Flint Webb said that Virginia and Maryland have many

jurisdictions, so a rotation that included the District every third year would mean that it would take a very long time for some jurisdictions to ever have a chance to take the leadership role. Joan Rohlfs suggested that the local committee decide itself on how best to handle the rotation. Tad Aburn said that while adding structure to the process is a good goal, the system also needs to be flexible. In response to a question from Victoria Greenfield, Ram said that the rotation period would match that of the TAC. Ram Tangirala said that it is also important to have the subcommittees report to the TAC Chair prior to the monthly TAC meeting. Flint Webb suggested that this be handled by providing a written report. Joan Rohlfs and Ram Tangirala said that any comments on the proposal should be sent to the TAC chair or to Ram Tangirala and that the issue should be discussed again in January.

**7. Stakeholder Nomination Process.** Joan Rohlfs discussed the stakeholder nomination process for 2006. As provided for in the bylaws, four individuals may be designated by the TAC Chair to participate in the TAC as non-voting stakeholders. Names of organizations to be invited to participate are due by December 16, 2005. Applications for stakeholder positions are due January 6, 2006.

In response to a question from Flint Webb, Joan Rohlfs said that there are 4 possible positions, each of which will be designated by the TAC Chair with MWAQC Executive Committee involvement. In response to a question from Bill Skrabak, Joan Rohlfs said that local air agencies could nominate someone, assuming the nominee is a stakeholder not currently represented on the committee. She also said that the positions are filled through nominations on an annual basis. In response to a question from Jeff Harn, Joan Rohlfs and Ram Tangirala said that the Chair of AQPAC can already participate on MWAQC so nomination as a stakeholder is not necessary.

## **8. State and Local Air Agency Report**

Bill Skrabak reported for the City of Alexandria. With regard to the situation at the Potomac River Power Plant, he said that Mirant has begun testing TRONA injections to control SO<sub>2</sub> emissions. The tests are showing that the approach is somewhat effective, reducing emissions by 20 to 60 percent. He said he hasn't seen the results of tests for particulate matter. The modeling showed potential violations for both SO<sub>2</sub> and PM<sub>10</sub>. The City of Alexandria made a land use decision that the operation at the site is a nonconforming use. Mirant has filed suit, and Alexandria expects to present arguments in court in January. In terms of the Consent Decree, the Department of Justice has requested an extension of 3-4 months. The City of Alexandria is also somewhat concerned about the impact that the Maryland Clean Power Rule may have on the expected emission reduction impact of the Consent Decree (i.e., double credits). In response to a question from Flint Webb about whether TRONA injection impacts mercury or HCl emissions, Bill Skrabak said that these pollutants were not modeled because the modeling studies have not indicated potential violations. He said that Virginia DEQ has agreed to model HCl and HFl.

Doris McLeod said that the Air Pollution Control Board has recently approved the proposed CAIR rules. The CAMR proposal was delayed pending additional analysis. Ram Tangirala asked if the CAIR rule sets out plant-level allocations and whether the STAPPA recommendations were followed. Tom Ballou said that the rule establishes the relevant procedures to handle allocations. Tom said that the STAPPA recommendations were evaluated as part of the ad hoc process, and that some but not all were adopted. He also said that a NO<sub>x</sub> allowance set aside was proposed. Bill Skrabak asked if the Pollution Control Board addressed the Mirant situation. Tom Ballou said that enforcement issues are always on the agenda. He said that Mike Dowd discussed both the Consent Decree as well as the current NAAQS modeling violation issue. He said that the Consent Decree is back on track.

Tad Aburn reported for Maryland. With regard to the Maryland Clean Power Rule, he said that the Air Quality Control Advisory Council met last week and that the CPR workgroup is drafting the regulations. The proposal will be released in early January with the rule being formally adopted in the spring/summer of 2006. Tad Aburn said that a final rule is highly likely because the Governor is committed to this

initiative. He said there will be discussions in the legislature about a potential four pollutant approach (CO<sub>2</sub>, NO<sub>x</sub>, SO<sub>2</sub> and Hg). The regulation only addresses three pollutants (NO<sub>x</sub>, SO<sub>2</sub> and Hg). In response to a question from Ram Tangirala, Tad Aburn said that in terms of mercury control, the Clean Power Rule is consistent with CAIR/CAMR. The Clean Power Rule will have a two phased approach, with 70-75% reduction in 2010 and a 90% reduction by 2015/2018. Tad Aburn recommended that a longer TAC meeting be held in February to discuss modeling and control strategies and to refine priorities.

Ram Tangirala said that the District had nothing to report.

**9. Set Date for Next Meeting, Future Agenda Items, Adjourn: January 12, 2006**

The TAC will meet next on January 12, 2006 from 10am to noon. There being no further business, the meeting was adjourned at noon.