

# Metropolitan Washington Air Quality Committee

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## TECHNICAL ADVISORY COMMITTEE *SIP WORKSHOP/MEETING*

Date: March 10, 2006  
Time: **10am to 2 pm**  
Place: **COG Board Room, 3rd Floor**

### DRAFT Agenda

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*Major elements of the ozone SIP will be discussed at this Workshop/Meeting. The Technical Advisory Committee will review draft attainment modeling results for the Washington region and will discuss recent actions by the Ozone Transport Commission. The TAC will also focus on control strategies for meeting the 8-hour ozone standard.*

- 10:00 1. Call to Order and Review of Meeting Summary (February 10, 2006)**  
*Chairman Jim Sydnor, Virginia Department of Environmental Quality*
- 10:10 2. Attainment Modeling: Report**  
*Tom Ballou, Virginia DEQ, will present preliminary attainment modeling results. Future modeling scenarios will be discussed.*
- 10:55 3. Emissions Inventory: Update**  
*Sunil Kumar, COG DEP, will discuss the status of emissions inventories for the 8-hour ozone SIP.*
- 11:10 4. Ozone Transport Commission: Update**  
*Tad Aburn, MDE, will discuss recent actions by the OTC.*
- 11:30 5. \*Control Measures**  
*Jeff King, COG/DEP, will discuss control measures development, including reasonably available control measures (RACM), priorities, and potential contingency measures for the 8-hour ozone SIP.*  
***Potential Action Item: Identify SIP Priority Measures***
- Noon. Lunch Break**
- 12:30 6. \*Comments on Draft TPB Work Scope for Conformity**  
*Stan Tracey, DC DOH, will present a draft comment letter on TPB's draft conformity scope of work and schedule.*  
***Action Item***

- 12:45 7. \*MWAQC FY07 Work Program and Budget**  
*Joan Rohlf, COG/DEP, will provide the MWAQC budget for 2007 for recommendation to MWAQC.*  
**Action Item**
- 1:00 8. Draft SIP Schedule**  
*Joan Rohlf, COG/DEP, will discuss the draft SIP schedule.*
- 1:15 9. Local Government Initiatives Subcommittee: Update**  
*Mary Richmond, Montgomery County, will provide an update on the activities of the Local Government Initiatives.*
- 1:30 10. State and Local Air Agency Report**
- 1:45 11. Set Date for Next Meeting, Future Agenda Items, Adjourn:**  
Next TAC Meeting: April 14, 2006

## **DRAFT**

### **MWAQC Technical Advisory Committee Meeting Summary February 10, 2006 10am to noon COG Board Room**

#### **Present:**

Randy Carroll, Maryland Department of Environment  
Diane Franks, Maryland Department of Environment  
Maurice Keys, District of Columbia Department of Transportation  
Sonya Lewis-Cheatham, Virginia Department of Environmental Quality  
Chris Meoli, Virginia Department of Environmental Quality  
Doris McLeod, Virginia Department of Environmental Quality  
Jim Ponticello, Virginia Department of Transportation  
Mary Richmond, Montgomery County Department of Environmental Protection  
Howard Simons, Maryland Department of Transportation  
Bill Skrabak, City of Alexandria  
Kanti Srikanth, Virginia Department of Transportation  
Jim Sydnor, Virginia Department of Environmental Quality  
Ram Tangirala, District of Columbia Department of Health  
Julie Thomas, National Park Service  
Didian Tsongwain, Prince George's County Department of Environmental Resources  
Stanley Tracey, District of Columbia Department of Health  
Flint Webb, Fairfax County Federation of Citizen's Associations  
Carl Winstead, Fairfax County Department of Transportation

#### **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

#### **Observers:**

Charley Baummer, Metropolitan Washington Airports Authority  
Julie Crenshaw, AQPAC  
Brian Hazelwood, Eastern Research Group  
Debra Jacobson, George Washington University  
Gary Koerber, Department of Defense REC Region III

**1. Call to Order and Review of Meeting Summary (January 12, 2006).** Mr. Sydnor called the meeting to order at 10:10. The minutes of the January 12, 2006 meeting were approved with no changes.

**2. Proposed PM NAAQS.** Sunil Kumar presented an analysis of the impact of proposed changes to the PM<sub>2.5</sub> annual standard on compliance in the Washington, DC-MD-VA nonattainment area. On January 17, 2006, EPA proposed a new 24-hour PM<sub>2.5</sub> standard of 35 µg/m<sup>3</sup>. The current standard is 65 µg/m<sup>3</sup>. EPA also proposed to retain the current Annual PM<sub>2.5</sub> standard at 15 µg/m<sup>3</sup>. EPA also announced a new PM<sub>10-2.5</sub> standard to be set at 70 µg/m<sup>3</sup>. The agency is seeking comment on alternative levels of 24-hour PM<sub>2.5</sub> standard (25 - 65 µg/m<sup>3</sup>) and the annual PM<sub>2.5</sub> standard (down to 12 µg/m<sup>3</sup>). The comment period ends on April 17, 2006.

Sunil Kumar estimated the 24-hour average PM<sub>2.5</sub> Design Value (2002-04) for Washington, DC region to be 45.7 µg/m<sup>3</sup>. He said that the Washington, DC region would be in violation of the new proposed 24-hour PM<sub>2.5</sub> standard for that time period because the design value is greater than the proposed standard of 35 µg/m<sup>3</sup>.

In response to a question from Kanti Srikanth, Sunil Kumar said that the region currently complies with the existing 24-hour standard. In response to a question from Flint Webb about monitoring for particulates between 2.5 and 10 µg/m<sup>3</sup>, Sunil Kumar said that EPA has proposed monitoring guidelines. One challenge will be to distinguish anthropogenic emissions from natural sources. Jim Sydnor said that natural sources in this region are not expected to be as significant a concern as they are in the western United States. In response to questions from Jim Ponticello and Howard Simons regarding modeling and inventory requirements, Jim Sydnor said that the SIP for the proposed new standard is not due until 2013. Joan Rohlf's said that states may need to submit data and recommendations to EPA in 2007.

Julie Crenshaw asked whether the states make recommendations about where monitors are placed. Jim Sydnor said that in the monitoring proposal, EPA has suggested fewer monitoring sites may be needed given those remaining may provide more comprehensive sampling. Currently, Virginia is not in the mode of reducing the number of monitoring sites. He also said that the proposed federal budget may reduce the funding for air programs, possibly up to 15 percent.

Diane Franks said that University of Maryland research suggests that the noncompliance with the annual standard is largely driven by a relatively small number of days (e.g., 35 days). One strategy may be to determine how to control those days and in the process resolve the problem with the annual standard.

**3. Mobile Emissions: SIP Inventories and Conformity.** Mike Clifford provided an update on staff efforts to prepare mobile emissions inventories for SIP and conformity purposes. He said that the computer program used to prepare input files for generating emission factors has been updated to enable use of hourly temperature, humidity, and barometric pressure inputs. At the request of the air agencies, he said that DTP staff are conducting sensitivity analyses to compare annual emissions using the proposed monthly or seasonal approach. DTP staff and TPB Technical Committee members are recommending that a seasonal approach be used to estimate annual emissions.

Jim Sydnor said that the state air agencies will not be able to make a decision on which approach (monthly vs. seasonal) until the sensitivity results are available. He asked what impact this process may have on the SIP schedule. Sunil Kumar said that the 2002 annual emission inventory is due in June, so mobile emissions estimates will be needed no later than April. Joan Rohlf's said that the emission inventory group will meet once the sensitivity results are available. In response to a question from Charley Baummer, Sunil Kumar said that an annual emission inventory will be needed for the airports and that it is not possible to derive such an inventory by multiplying the ozone season day values by 365.

Mike Clifford then discussed the work scope for handling the conformity determination for the 2006 CLRP and 2007-2011 TIP. The work scope and the call for projects document have been released for public comment. TPB is expected to take action in March. He said that in 2006, the interim emission tests will be used again for both PM<sub>2.5</sub> and ozone. For ozone, conformity is demonstrated if precursor emissions in the milestone years are not greater than the mobile budgets established in the 1-hour ozone SIP. For PM<sub>2.5</sub>, conformity is demonstrated if PM<sub>2.5</sub> and NO<sub>x</sub> precursor emissions in the milestone years are not greater than 2002 emissions (i.e., build no greater than 2002 interim emission test). He said emission will be calculated using the latest inputs, including 2005 vehicle registration data, I/M cutpoints, hourly temperature and humidity values, and NO<sub>x</sub> rebuild compliance rates, etc.

Bill Skrabak began a discussion of interagency consultation procedures. He asked if the specific inputs used to estimate mobile emissions have been outlined in detail. He also said that MWAQC TAC wasn't given the opportunity to review the analysis prior to release for public comment therefore may not have adequate time for review. Stan Tracey said that he is the new Chair of the TAC Conformity Subcommittee and that the group will hold a conference call next week to discuss. Mike Clifford said that the work scope does not provide the actual data inputs, but rather specifies the required inputs as categories. Kanti Srikanth and Mike Clifford said that the interagency consultation procedures are being followed as outlined in the May 1998 Interagency Consultation Agreement. Jim Sydnor said that additional details on inputs could be provided for the Conformity Subcommittee call.

In response to a question from Maurice Keys, Joan Rohlf said that the work program may have to be revised in the future to address additional precursors. Jim Ponticello said that if the PM SIP identifies additional precursors, then the Conformity scope would have to be expanded. Bill Skrabak asked when PM hotspot analyses will be required. Howard Simons said that the final rule may be released in March and it's not clear what will be required at this time.

Jim Sydnor said that Virginia will extend the I/M exemption for new cars from 2 years to 4 years, effective in July. Jim Ponticello said that the exception only applies to cars on first titling. Stan Tracey said that a similar proposal is being discussed in the District. Joan Rohlf mentioned that a COG board member from Frederick County is also investigating the possibility of such an exemption for Maryland.

**4. Off-road Equipment Inventory Survey.** Joan Rohlf will discuss developing a survey of non-road equipment in the Washington, DC region. She said that the scope of the survey has narrowed and will now focus only on transportation construction equipment. Under SAFETEA-LU, retrofit of non-road equipment is now eligible for funding under CMAQ. She said the RFP for the survey work is posted on the COG website. The project will be handled in 2 phases, and the project completion date is December 31, 2006. In response to a question from Charley Baummer, Joan Rohlf said that only transportation construction equipment will be surveyed and that there is no eligibility guidance yet. Jim Sydnor asked about application of emission reduction credits in the event that equipment is identified and retrofits are funded. Howard Simons said that emission reduction credits for the non-road sector can't be applied directly for conformity purposes, but the reductions can go into the SIP and be used to adjust mobile budgets. Jim Ponticello said that intersector trading is also be considered.

Mike Clifford said that it's a new program element. It makes sense to start by conducting an equipment survey to determine the scale of the problem. The study has been added to TPB's work program and that DEP staff are coordinating the effort because the project involves the non-road sector. Joan asked for volunteers for a contract award selection committee. Howard Simons, Jim Ponticello, Sonya Lewis-Cheatham, Maurice Keys, and Carl Winstead all tentatively agreed to participate.

**5. Control Measures: Update.** Jeff King provided an update on evaluating reasonably available control measures (RACM). Evaluating RACM is a SIP requirement. He said a workgroup has been meeting to handle the evaluation. First, the workgroup developed criteria to screen all of the measures on the master

list to determine whether any could be considered RACM. For a measure to be considered RACM, the measures must reduce emissions by the beginning of the Washington region's 2008 ozone season (May 1, 2008); be enforceable; be technically feasible; be economically feasible (proposed as a cost of \$3500-5000 per ton or less); must not create substantial or widespread adverse impacts within the region; and emissions from the source being controlled must exceed a de minimis threshold, proposed as 0.1 tons per day. In addition, any RACM measures, as a group, must meet enable the region to reduce ozone levels to 85 ppb during the 2008 ozone season (i.e., advance the attainment date by one year). The RACM determination is not the same as deciding which measure to implement as part of the SIP and attainment strategy. The goal of RACM is to ensure that all measures needed for attainment are being adopted as expeditiously as practical, and to determine if there are additional measures that could be adopted to advance the attainment date. Using the criteria and the master list of control measures, the control measures workgroup is meeting on a weekly basis to agree to the evaluation for each measure. So far the group has handled the stationary and area sources. Non-road and then mobile sources will be handled next. The updated RACM evaluation lists reflecting these agreements should be available in mid-March.

In response to a question from Jim Sydnor, Jeff King said that the group has yet to identify any measures that are RACM. Jim Sydnor said that given measures must be in place by May 2008 to be considered RACM, the longer the region waits, the harder it will be to identify any measures that are RACM. Jim Ponticello asked if any modeling was being done as part of the RACM process. Joan Rohlfs said that this is not a requirement. She also said that states won't adopt measures until modeling shows that it is needed. Flint Webb said that the RACM process for the PM SIP should be started earlier.

**6. MWAQC FY07 Work Program and Budget: Overview.** Joan Rohlfs provided an update on developing the MWAQC work program and budget for 2007. She said that preparing the 8-hour ozone SIP will be an important task, with completion of a SIP for public comment expected in late summer/early Fall. The OTC model rules aren't expected until June 2006 and they may be an important component of the region's control strategy. The program also will involve beginning work on the PM SIP, including inventory work and efforts to identify strategies that provide co-benefits. Additional guidance is needed from EPA on PM attainment modeling. The scope also includes efforts on transportation conformity. Additionally, there will also be an emphasis on new local measures, with diesel retrofits being considered a high priority.

She said the budget has a core and a local component. The local budget includes funding for the non-road equipment survey consultant as well as a consultant for public outreach. According to the bylaws, the funding is split evenly between the three states air agencies, transportation agencies, and local jurisdictions. There is also a COG TPB contribution for the non-road equipment survey. The next step is to review a detailed work plan and budget next month for recommendation to MWAQC for action in March.

**7. New Subcommittee: Local Government Initiatives.** Jim Sydnor announced a new TAC Subcommittee. The Local Government Initiatives Subcommittee will be chaired by Mary Richmond in 2006. The goal of the subcommittee will be to identify voluntary local measures that can be reflected in the air quality plan. Jim Sydnor said that new members are needed and the group will meet for the first time in March. Jeff King and Joan Rohlfs said that one of the first activities of the group will be to identify information on FY 2007 budgets and plans, and to collect data on the progress made in meeting the voluntary bundle commitments in 2005.

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

Diane Franks reported for Maryland. She said that Tad Aburn has been promoted to Air Director. MDE is still working on proposed amendments to the Healthy Air Act. Staff are also tracking legislation, including tax breaks for hybrids. She said staff are participating in a midwest delegation along with the

OTC in an effort to encourage large regional measures. Jim Sydnor asked if the Healthy Air Act has a provision for CO<sub>2</sub>. Diane Franks said that the proposed legislation caps CO<sub>2</sub> in 2015 with a 10 percent reduction by 2018. Joan Rohlfs said that the February 22 meeting at MWAQC will focus on legislative proposals.

Stan Tracey reported for the District. He said that an NSR regulation public hearing was held. Internal discussions are ongoing regarding the need for a CAIR SIP by September.

Jim Sydnor reported for Virginia. He said that the Virginia General Assembly acted on mercury. Some members were proposing language that would not allow Virginia to go beyond federal requirements. Patricia Ticer introduced a compromise that led to acceptance of the Bill. The Virginia CAIR rule will be released for public comment soon.

Julie Crenshaw shared a research paper on mercury concentrations detected in human hair. She reported sample results for Maryland, Virginia, and the District. Jim Sydnor asked her to share a copy of the report with members.

Bill Skrabak provided a brief update on the situation with the Mirant Potomac River power plant. Mirant sued the City of Alexandria, arguing the recent land use action taken by the city was unlawful. The court decision favored Mirant. The City of Alexandria is appealing to the Virginia Supreme Court. Bill Skrabak also said that a Department of Energy (DOE) order in December required the Mirant plant to run at full capacity during planned transmission line system maintenance, which occurred in January. Once the repairs were completed, the plant began operating again on only two boilers, with TRONA injection to reduce SO<sub>2</sub> emissions. The City of Alexandria is still awaiting the results of testing of the impact of TRONA injection. Also as part of the DOE order, an environmental impact study is being prepared. The City of Alexandria has also recently filed a nuisance lawsuit. Both the City of Alexandria and the Commonwealth of Virginia have petitioned the DOE to reconsider its order.

#### **9. Set Date for Next Meeting, Future Agenda Items, Adjourn: March 10, 2006**

The TAC will meet next on March 10, 2006 from 10am to 2pm. This will be a special meeting to focus on the results of attainment modeling and to begin to focus in on a control strategy. There being no further business, the meeting was adjourned at 12:05 pm.