

**Summary of Member Comments on the Reasonable Progress Draft Control  
Scenarios Technical Memorandum #1 Document**

Prepared January 26, 2007

The Reasonable Progress Draft Work Plan was emailed to the Reasonable Progress Workgroup on January 24<sup>th</sup> and the replies were due by January 26<sup>th</sup>. Six members commented on the document and their comments are summarized here. Comments were received from the following groups: the State of New Jersey via Ray Papalski, the Ozone Transport Commission via Doug Austin, the State of New York via Gopal Sistla and Diana Rivenburgh, the state of Delaware via Jack Sipple, and the Mid-Atlantic Regional Air Management Association, Inc., via Susan S.G. Wierman and Angela Crenshaw.

**General Comments**

MARAMA has recently been incorporated. Wherever Mid-Atlantic Regional Air Management Association is written out “Inc.” needs to follow, i.e. “Mid-Atlantic Regional Air Management Association, Inc.” This affects the cover page and page 1 of the document. However, MARAMA the acronym can stay the same.

The Control Scenarios document is very brief, more information needs to be added.

**Control Scenarios Technical Memorandum #1**

Page 1, paragraph 2 it is recommended that the word “and” be removed from the last bullet and placed at the end of the second to last bullet.

Page 1, paragraph 3 of the memo lists only six major source categories, not seven. Should smelters be added to the list as referenced on the “Source Category Controls” spreadsheet?

Page 2, paragraph 4 of the memo states “...information on existing control is also provided.” This should read “...information on existing controls is also provided...”

Page 2, paragraph 4, 1st sentence, please reword and clarify. The 16 individual facilities were not identified solely because they were major contributors to visibility impairment in Class I areas (these 16 are not the only ones identified as major contributors). The 16 were identified here, as a sample of the major contributors, for the basis of an analysis of the four factors to determine “reasonable measures”. They were identified as a basis for gaining more information to assist in the determination of costs and other factors which could be useful in determining further applicability of controls to uncontrolled sources. Please clarify so as to not make an assertion that these 16 are the only major contributors.

Page 2, last paragraph of the memo refers to the four factor analysis and lists “compliance timeframe” as one of the factors. This is not referred to in the BART program, so should this be replaced by “existing controls at the source”?

## **RPG Control Scenarios TM #1.xls Document**

The State of Delaware stated that in regards to the NRG Dover coal boiler, the list of viable retrofit/add-on SO<sub>2</sub> control technologies looks good, and the associated reduction efficiencies and cost-effectiveness values look reasonable; all relative to other industry information for small coal-fired boilers.

The table of control scenarios lists, under “Residential wood combustion and open burning” - Use of high Efficiency / less polluting woodstove technology. It is suggested that a comparison of these units to the Washington/Oregon standards for similar units be added to the Technical Memorandum. It would be good to discuss these regulations in relation to the unit efficiency to see if a model rule similar to Washington’s or Oregon’s would cover these type of units or perhaps a regional model rule here could be more stringent than these state standards, which are more stringent than EPA standards.

The cost-effectiveness ranges in Columns E (Source Category Controls) and O (Individual Source Controls) of the spreadsheets seem very wide for effective consultations on the costs of any Reasonable Progress goals developed by the Class 1 states. It is recommended that they be refined or narrowed down.

In regards to the Source Category Controls spreadsheet, there is an interesting control strategy- coal cleaning / washing that supposedly can get a 20-25% reduction on SO<sub>2</sub>. Two questions:

- 1) That control strategy is not carried over on to the Individual Source Controls spreadsheet. Any reason why not? And,
- 2) Is coal cleaning viable for the ICI sector, i.e., can that sector buy cleaned coal in the open market, or is the market pretty much confined to large EGUs? It might be a viable control strategy for the ICI sector without much if any capital investment. How does “cleaning” or “washing” the coal get sulfur out - isn't it chemically bound? Finally, what percentage of EGUs use cleaned coal? Is it only used at mine-mouth EGUs?

Edits were made to the *RPG Control Scenarios TM#1* document in regards to Motiva, see attached.

Attachment: DE RPG Control Scenarios TM#1.xls document