

**Summary of Member Comments on the Reasonable Progress Draft Methods for
Evaluation Technical Memorandum #2 Document**

Prepared February 2, 2007

The Reasonable Progress Draft Methods for Evaluation Technical Memorandum #2 was emailed to the Reasonable Progress Workgroup on January 29th and the replies were due by February 2nd. Three 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 State of New York via Matt Reis, and the Mid-Atlantic Regional Air Management Association, Inc., via Susan S.G. Wierman and Angela Crenshaw.

General Comments

When referring to Tasks and Technical Memoranda, it is requested that the names of the Tasks and Technical Memoranda be used, not the numbers. For example, Task 2 or Technical Memorandum 1 should be referred to as the Control Scenarios Technical Memorandum.

Methods for Evaluation Technical Memorandum #2

Section 2

For source category evaluations it is recommended that MACTEC look at LADCO's Methodology Memo to see how the time necessary for compliance category was addressed and use the document as a guide. MACTEC should consider EC/R's approach to clearly defining methods for categories versus individual sources.

Section 4

Under the category of remaining useful life of the source: MACTEC indicates that this factor is not applicable to the source category analysis. This may be true of most SO₂ source categories, however, it is not true for residential wood combustion (fireplace inserts and wood stoves) and perhaps home heating oil. It is requested that MACTEC should consider the other three to determine if remaining useful life is important and recognize that it needs to be addressed in some fashion for the source categories because it is still a requirement to address in the rule. It is recommended that if remaining useful life is not included in the analysis then there needs to be a statement about why it was omitted.

In regards to the remaining useful life of the source: the approach that MACTEC has described is, in general, reasonable. However, some of the larger sources (i.e., EGUs) may be at the end of their useful lives by 2013 but (see the WEBCO decision that precipitated the PSD lawsuits a few years ago) I think we need to at least consider the possibility that some sources that should shut down may not for a variety of reasons.