

Mid-Atlantic and Northeastern Class I Area Consultation

Reasonable Progress Workgroup Conference Call

Draft Minutes

February 23, 2007

11:00 am to 12:00 pm EST

Attendees:

- Diana Rivenburgh of New York
- Kurt Kebschull of Connecticut
- Wick Havens of Pennsylvania
- Jeff Crawford of Maine
- Steve Dennis of Massachusetts
- Liz Nixon of New Hampshire
- Andy Bodnarik of New Hampshire
- Ray Papalski of New Jersey
- Ann Acheson of USFS
- Anne McWilliams of EPA Region I
- Paul Wishinski of Vermont
- Andy Heltibridle of Maryland
- Mark Prettyman of Delaware
- Doug Austin of OTC
- Pat Brewer of VISTAS
- Mike Koerber of LADCO
- Gary Kleiman and Praveen Amar of NESCAUM
- Art Werner and Lori Cress of MACTEC
- Susan Wierman, Angela Crenshaw, and Julie McDill of MARAMA

Agenda Items

General Overview: The main focus of this call was reviewing the Statutory Factors Technical Memorandum #3 comments, the Four Factor Analysis presentation that will be given at the March 1st MANE-VU Consultation meeting, and a discussion of what is reasonable with regards to controls.

Discussion of Statutory Factors TM #3 Comments: A member of the Workgroup stated that they would like to see more information about ICI boilers. It was stated that Praveen Amar and Addison Fowler of NESCAUM should be contacted regarding information about ICI boilers. A member of the Workgroup suggested that MACTEC could look at the Clearinghouse for MACT, BACT, and LAER to find information about controls.

A member of the Workgroup also stated that it is important to focus on fuel switching, from high sulfur fuels to low sulfur fuels. A member of the Workgroup stated that data from 2000 about flue gas desulfurization (FGD) is too old and it was suggested that newer data should be used.

Papalski stated that under the time for compliance sections, the TM needs to include information about the industry timeframe as opposed to the state or federal timeframe. Wierman said both were important. Papalski also stated that a longer timeframe of 5-10 years may be needed for applying control measures. It was also stated that the Haze Rule says that if 5 years after the SIP submittal, the state has not reached reasonable rate of progress then the SIP may need to be revised.

In regards to kilns, Havens stated that there is a lot of turnover and they are complicated because controls that work at one kiln, may not work at another. He gave Terry Black as a contact for additional information about kilns.

Wierman stated that there was a lot of interest in more controls for outdoor wood boilers. Papalski stated that he would like to see a model rule addressing wood burning and new stove inserts and a regional strategy. McDill stated that Pennsylvania has a wood stove change-out program up and running.

Amar gave a brief update on the ICI project NESCAUM is working on. The project will look at NO_x, SO_x, and PM controls on ICI boilers and will incorporate Bodnarik's work and include information about emerging technologies. This report will focus on costs not recommendations. NESCAUM expects to have a contract signed by March 1st and the final report by December.

Koerber stated that LADCO is working with Jim Stout to study RACT and review ICI boiler recommendations.

Discussion of the Four Factor Analysis Presentation at the MANE-VU Consultation Meeting: A member of the Workgroup stated that MACTEC should provide as much information as possible about switching from high sulfur fuels to low sulfur fuels, especially availability and costs. It was stated that it is important to show the cost of low sulfur fuel oil in dollars per ton so that it can be compared to the cost of other control measures. It was also stated that it is important to use the wholesale sulfur prices that do not contain taxes, as opposed to the retail prices that do include taxes.

Austin stated that he is working on one-page documents about Regional Haze reduction strategies for low sulfur fuel, CAIR+, BART, residential wood combustion, the OTC SO₂ control measures, and ICI boilers by state for the meeting. He wanted to make sure that MACTEC and OTC were collaborating and using the same information. Wierman asked MACTEC to be sure to document the sources of information in the report.

A member of the Workgroup stated that the ranges on the ICI boiler controls are too large and need to be made smaller. It was suggested that medians are used as opposed to arithmetic averages, which may be influenced by an outlier.

What is reasonable with regards to controls: Wierman stated that if any member of the Workgroup had any comments on what is reasonable with regards to control, they should be sent to MARAMA because information about what is reasonable needs to be presented soon.

MACTEC update: MACTEC stated that they were working on the presentation for the MANE-VU Consultation Meeting and addressing comments to the Statutory Factors TM.

Next steps: The next Reasonable Progress Workgroup Call was scheduled for Wednesday, March 14, 2007 at 11am.

The next step in the Reasonable Progress Project will be a revised final version of the Statutory Factor Technical Memorandum, which is due on March 8th.

Crenshaw will type up a summary and circulate it before it is posted on the MARAMA website.