

Mid-Atlantic and Northeastern Class I Areas Consultation

Reasonable Progress Workgroup Conference Call

Draft Minutes

February 1, 2007

11:00 am to 12:20 pm EST

Attendees:

- Diana Rivenburgh of New York
- Ray Papalski of New Jersey
- Jeff Crawford of Maine
- Paul Wishinski of Vermont
- Jack Sipple of Delaware
- Mark Prettyman of Delaware
- Liz Nixon of New Hampshire
- Andy Heltibridle of Maryland
- Nancy Herb of Pennsylvania
- Jude Catalano of Connecticut
- Kurt Kebschull of Connecticut
- Dave Wackter of Connecticut
- Tom Downs of Maine
- Jeff Crawford of Maine
- Anne McWilliams of EPA Region I
- Denis Lohman of EPA Region III
- Neil Bigioni of EPA Region III
- Bill Thompson of the Penobscot Nation
- William Hodan, Lori Cress, and Walt Gray of MACTEC
- Pat Brewer of VISTAS
- Gary Kleiman of NESCAUM
- Susan Wierman and Angela Crenshaw of MARAMA

Agenda Items

General Overview: The agenda for this call included a brief update on LADCO's Reasonable Progress Project, a discussion of the revised list of sources by Wishinski, a discussion of the Methods for Evaluation Technical Memorandum #2 by MACTEC, an update on the current status of the project by MACTEC, and a discussion about what criteria will be used for deciding what is reasonable with respect to the 4-factors.

Update on LADCO's Reasonable Progress Project: Crenshaw gave a quick update on the status of LADCO's Reasonable Progress Project stating that the methodology memo and the list of individual facilities were finalized and sent to the Workgroup. The list of source sectors and priority control measures were reviewed and it was noted that LADCO is including biodiesel as a control measure. A member of the Workgroup had previously suggested including biodiesel in our analysis, however Cress stated that biodiesels are used to control NO_x from mobile sources and MACTEC's project does not include mobile sources.

Revised list of sources: Wishinski reviewed the revised list of individual sources using a PowerPoint presentation. It was agreed that five Massachusetts sources had been included in the revised list by mistake and would be removed from the next round of modeling analysis along with all EGUs, which have been modeled separately. A member of the Workgroup stated that the MACTEC analysis should focus on EGUs since they are the largest contributors to regional haze. If CAIR works ideally and the major EGUs are controlled, then visibility would increase in Class I areas. It was stated that only non-EGUs that have impacts comparable to EGUs should be analyzed.

If additional specific sources were to be added to the list of sources to analyze, Wishinski recommended adding MeadWestvaco in Virginia, Holcim Inc. in Michigan, Hercules in Pennsylvania, Sunoco Inc. in Pennsylvania, Citgo in Illinois, and LaFarge in Michigan.

Wishinski stated that a decision needs to be made about whether to use the annual ranking or the maximum 24-hour ranking. The maximum 24-hour ranking allows a rough comparison to the EGU list in the Contribution Assessment rankings and the annual impact ranking allows for the analysis of cumulative impacts from multiple sources.

Wierman stated that based on the previous analysis EGUs are the most important sources and those with the largest impacts need to be analyzed to see if they will be controlled by CAIR. According to the Air Directors a lot of controls are currently being put on EGUs. She asked MACTEC to focus first on EGUs, while further work was done to refine the list of other sources.

Review of Methods for Evaluation TM #2: MACTEC discussed the draft Methods for Evaluation Technical Memorandum #2 that is currently out for review. It was stated that part of the work would be based on previous work in developing BART documents for MRPO.

Papalski's comment regarding the TM was discussed. The comment was in reference to the remaining useful life of sources category. In the TM MACTEC had indicated that this factor was not applicable to the source category analysis. Papalski stated that this is true for most SO₂ source categories but not for residential wood combustion (fireplace inserts and wood stoves) and perhaps home heating oil. He stated that the other three factors should be relied upon to determine if this is important and recognize that we need to address it in some fashion for the source categories because it is still a requirement to address in the rule. Papalski also stated that if remaining useful life is not included in the analysis then there needs to be a statement about why it was omitted. MACTEC agreed with the statement.

Wierman recommended that MACTEC look at LADCO's Methodology Memo to see how the time necessary for compliance category was addressed and consider identifying methods for categories and individual sources separately.

Wishinski inquired about states being held responsible for a control that was not implemented. Herb stated that reasonable progress goals are not enforceable but are used to determine the approvability of SIPs. Kleiman stated that reasonable progress goals are a tool for consultation, but what is included in a SIP is enforceable if it is backed up by technical information.

Wierman inquired about what the Workgroup wants to come out of this project i.e. how an analysis of individual facilities will fit into reasonable progress goals. It was agreed that the states were looking for general information about the cost of controls for source categories and individual sources and information about what sources will be controlled.

MACTEC stated that they have already spoken with MANE-VU and non-MANE-VU states about what controls are being installed and this will be addressed in the deliverables.

It was stated that comments about the Methods for Evaluation TM should be sent to MARAMA by noon on February 2nd.

Status of Contract and other Deliverables: MACTEC stated that the Control Scenarios TM had be revised and sent to MARAMA before today's call. MACTEC stated that all the loose ends within the Technical Memoranda will be tied up in the Final Report.

Criteria for Determining what is Reasonable: Wierman introduced the topic of deciding on criteria for what is reasonable with respect to the 4-factors. A previous suggestion was to use criteria similar to those used with respect to the BART 5-factor analysis, which placed control costs into the categories of low, medium, and high cost (found in Appendix A of the NESCAUM BART 5-Factor Analysis document). Crawford stated that this was a good starting point. Kleiman stated the criteria were also available in the NESCAUM 2005 BART report.

Next steps: The next Reasonable Progress Workgroup Call was scheduled for Thursday, February 8, 2007 at 11 am.

Wishinski will re-evaluate the list of individual sources based on maximum 24-hour or annual ranking.

Wierman and Crenshaw will write a short description of the process used to select specific sources for analysis as part of the MANE-VU Reasonable Progress Project and send it to Wishinski, Sipple, and Prettyman for review before sending it to MACTEC.

Kleiman sent the previous BART report and will send the BART 5-Factor document to MACTEC next week after the states are allowed to provide comments on it.

After comments are received on the Methods for Evaluation Technical Memorandum MACTEC will finalize the document.

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