

DEPARTMENT OF ENVIRONMENTAL QUALITY

Fine Particulate Matter (PM-2.5) Implementation Workgroup Meeting Agenda & Minutes

| Project/Activity | PM-2.5 Implementation Workgroup Meeting | Scribe | Bobby Lute | | Phone | 804-698-4410 |
|------------------|--|--|---|--|--------------|--------------|
| Purpose of Mtg. | | evelop a policy to be used by the Commonwealth of Virginia to implement air permitting, air ity assessment, compliance and monitoring procedures for PM-2.5. | | | | |
| Technical Lead | Mike Kiss | Phone | 804-698-4460 | | | |
| Meeting Date | May 21, 2008 | Time | 9:30 AM - 2:45 PM Location DEQ Central O 629 East Main S Richmond, Virg | | ast Main St. | |

| Next Meeting | Date TBD | Time TBD | Location | TBD |
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| ⊠=In Attendance | | | |
|----------------------------|-------------------------------------|--|--|
| Mike Dowd – DEQ | Dave Cramer – Mirant | 🔀 Ryan Gesser – Georgia Pacific | |
| Mike Kiss – DEQ | 🔀 Dave Shea – ENSR | Barbara Wunder – Merck | |
| 🔀 Tamera Thompson – DEQ | Larry Labrie – Dominion | 🔀 David Husain – Merck | |
| Tom Ballou – DEQ | Lenny Dupuis – Dominion | Maureen Barrett – AERO Engineering Services | |
| Bobby Lute – DEQ | 🔀 Bill Skrabak – City of Alexandria | Michele Satterlund – City of Alexandria | |
| Jerome Brooks – DEQ | 🔀 Ana Prados – Sierra Club | ⊠ Lowell Smith | |
| 🔀 Karen Sabasteanski – DEQ | 🗌 Malay Jindal – MACTEC | | |

| # | Agenda Topic (Add Rows as Needed) | Agenda Owner(s) |
|---|---|-----------------|
| 1 | DEQ Regulatory Process for Adopting the Final PM-2.5 NSR Rule | Sabasteanski |
| 2 | EPA's Final Rule for Implementation of the NSR Program for PM-2.5 | Kiss |
| 3 | Specific Stakeholder Recommendations | Kiss |
| 4 | Specific Issues Not Covered by the PM-2.5 NSR Rule | Kiss |
| 5 | Next Steps | Kiss |

| Follow Up Assignments/Key Issues to Be Resolved | | | |
|---|---|-------------|----------|
| # | Task | Assigned To | Due Date |
| 2-5 | Provide suggested language for PM-2.5 policy for DEQ consideration. Particular focus should be given to emission calculations and how they relate to permit applicability, the ambient air quality analysis, and the compliance determination. It is also recommended to provide input on topics not addressed by EPA's recently released rule such as Significant Impact Levels (SILs), PSD Increments, and Significant Monitoring Concentrations (SMCs). | Group | 7/1/2008 |

| # | KEY DECISIONS MADE |
|-----|--|
| 2-5 | Submittal of "Follow Up Assignments" due to Mike Kiss via e-mail no later than July 1, 2008. |

| # | MEETING MINUTES |
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| 1 | Group was encouraged to sign up for the Virginia Regulatory Town Hall at <u>www.townhall.virginia.gov</u> in order to keep track of the status of DEQ's adoption of the PM-2.5 NSR rule. A brief overview of the regulatory options for DEQ in adopting the final PM-2.5 NSR Rule was provided. These included: 1) an expedited ("fast-track") process where there is no public interest and the final rule is adopted as it is written; adoption estimated to be the end of 2008; 2) some public comments; adoption estimated to be mid-2009; 3) full process that typically takes 2-3 years before adoption. Specific information for the regulatory process for adopting rules is contained in the Code of Virginia Administrative Process Act. |
| 2, 3 | EPA's Final Rule for Implementation of the NSR Program for PM-2.5 was discussed. The main issues were PM- 2.5 applicability (whether or not to include PM-2.5 condensables in the PM-2.5 emissions calculations) and the ambient air quality analysis. For calculating PM-2.5 emissions for applicability purposes, three options were identified: 1) include filterable and condensable PM-2.5 emissions based on the best science available at the time; 2) continue to use the PM-10 surrogate policy; and 3) use filterable PM-2.5 emissions only. The topics of interest identified for the ambient air quality analysis were the inclusion of condensable PM-2.5 emissions, fugitive emissions and/or secondary emissions in the modeling analysis, background air quality data, and the inclusion of nearby emission sources. Also discussed were the technical issues related to modeling PM-2.5 precursor emissions. Precursor emissions are addressed in the air quality regional planning analysis but if there is a concern with a very large source, regional PM-2.5 modeling (i.e., CAMx source apportionment modeling) might be an option. However, impacts from any one particular source on regional air quality tend to be very small and "within the noise" of the regional models. It was indicated the rule requires that the offsets in a nonattainment area need to occur in the same nonattainment area. |
| 4 | EPA expects to finalize PM-2.5 significant impact levels (SILs), increments and significant monitoring concentrations (SMCs) by the end of 2008. Based on the proposed rule, the preferred increments are from option 1 while there appears to be no specified preference indicated for the SILs and SMCs. A concern was raised that the basis for the proposed Class I SILs was not the same as for Class II and Class III SILs. |
| 5 | It is estimated that the next meeting will be late July or sometime thereafter to allow time for DEQ to review the submitted draft policy language and draft a policy as well as for the group to review the draft policy. If a need should arise, a conference call before this meeting may occur. |