

NOACA Air Quality Public Advisory Task Force
Meeting Summary
May 5, 2006

The Chair, Dr. Nora Nock, called the meeting of the NOACA Air Quality Public Advisory Task Force to order at 12:30 p.m. (See attached sign-in sheet and the revised slate of recommended Ozone SIP Recommendations.)

The meeting began with introductions and a thank you to the Task Force members for their participation in the Ozone SIP development process.

As requested, NOACA staff presented a summary analysis of the Task Force's Voting Tally results. In addition, staff explained that the agenda was crafted based upon the emission reduction options that needed further discussion, clarification and/or consensus.

The first issue that required clarification and discussion was the EGU1 and EGU2 scenarios (Options PT-1 and PT-2). Staff, with assistance from local industry experts, clarified that PT-1 would require additional emission caps based on "Retrofit NOx BACT" (Best Available Control Technology) levels of 0.10 lbs/mmBtu NOx on all six plants for a 33% reduction from the CAIR program. PT-2 would require additional emission caps based on "NOx BACT For New Plants" levels of 0.07 lbs/mmBtu NOx on all six plants for a 53% reduction from the CAIR program. Each would require the installation of additional selective catalytic reduction (SCR) controls on increased units at the various plants. It was noted that the costs described by LADCO for each control included only capital costs, not operating and maintenance costs. First Energy noted that its position was that even the capital costs were underestimated by LADCO.

The Task Force recommended that the Ohio EPA be guided by the air-shed modeling for Northeast Ohio and impose further controls on electric utilities (electric generating units - EGUs), using either PT-1 and/or PT-2 as may be deemed necessary. However, the Task Force recommended that such controls be mandated on a multi-state basis through Ohio EPA's work with the states of LADCO (Lake Michigan Air Directors Consortium), those states being Ohio, Indiana, Illinois, Michigan, and Wisconsin, because only multi-state NOx controls show an appreciable benefit to Northeast Ohio. A motion for the recommendation was made by K. Fagan and seconded by T. McCormick; the motion passed in an 11 to 6 vote. A Task Force quorum was present.

The next agenda item included a clarification regarding Ohio EPA's plans to write VOC and NOx RACT Rules and the stringency of the emission reduction options voted on by the Task Force. Staff explained that although Ohio EPA may be considering writing rules for many of the options considered by the Task Force, the level of stringency of the proposed rules was unknown. Staff also pointed out the many of the Task Force members had commented that if Ohio EPA was considering rules for any of the options, those options should be removed from the recommended slate of options as a way to recommend more emission reduction options. Discussion followed, resulting in a decision by the Task Force to keep all of the VOC and NOx RACT rule options and the voted upon level of stringency in the slate of recommended options. A motion was made by S. Martin and seconded by R. Evans; the motion passed unanimously.

The Task Force also agreed to recommend that all NO_x RACT rules developed by Ohio EPA be written to cover the entire state of Ohio to ensure economic competitiveness among nonattainment and attainment areas.

The Task Force expressed no comment on other new VOC and NO_x rules requiring Reasonably Available Control Technology (**RACT**) at industries in Northeast Ohio, to be determined by the Ohio EPA after study, because the Task Force has seen no drafts of such rules, could not study their air impacts or their costs, and did not study the categories independently. The categories might include the following:

Additional NO_x RACT - Ohio EPA possibilities

- 1.) Process heaters, e.g., for chemical or steel processes
- 2.) Large stationary internal combustion engines, either gasoline or diesel
- 3.) Combustion turbines, often at electric generating units, requiring either a change in operating practices or a change in fuels
- 4.) Asphalt batch plants, possibly statewide
- 5.) Other sources, after top-down RACT study -- glass furnaces, etc.

Additional VOC RACT - Ohio EPA possibilities

- 1.) Synthetic organic compound manufacturing - Northeast Ohio only
- 2.) Organic compound batch processes - Northeast Ohio only
- 3.) Wood manufacturing - Northeast Ohio only
- 4.) Industrial wastewater (to capture petroleum, etc.) - Northeast Ohio only
- 5.) Aerospace industry, including repair facilities - Northeast Ohio only
- 6.) Shipbuilding and boat building and repair - Northeast Ohio only
- 7.) Bakeries (large), with extended compliance deadline - Northeast Ohio only
- 8.) Plastic parts coating (often auto subcontractors) - Northeast Ohio only
- 9.) Volatile organic liquid storage tanks (large) - Northeast Ohio only
- 10.) Industrial solvent cleaning - Northeast Ohio only
- 11.) Offset lithography - Northeast Ohio only
- 12.) Other sources, after top-down RACT study - case by case

The third item for discussion and clarification was the emission reduction option of moving to the final standards of the E-Check inspection and maintenance program – ASM 2525 Final standards, as well as a potential “Cash for Clunkers” program. Staff reported that the Mobile Source Work Group spent considerable time on potential enhancements to E-Check, including going final on the ASM 2525 standards, which are more stringent than existing standards. Staff also explained that the Work Group stated that going final on the standards would result in additional vehicles failing, perhaps as many as 1 in 4, resulting in impacts to the economically disadvantaged, thus creating an environment justice issue. As such, the Work Group also explored a “Cash For Clunkers” program as a potential solution.

After review of the ASM 2525 standards, the representative from E-Check supplied the corrected figures for the costs of the program (increased costs to car owners for additional repairs) and corrected costs per ton of pollutant removed. Upon review of the new data and review of the information on the “Cash for Clunkers” program, B. Leidich motioned to remove the “Cash For

Clunkers” program from the slate of recommended options as not cost-effective. J. Segedy seconded the motion and the motion passed 16 to one.

Transportation control measures were identified as the fourth agenda item and included the following subcategories for discussion: anti-idling practices, alternative fuels, trip reduction programs and funding priorities.

Staff requested that the Task Force clarify its anti-idling practices recommendation as to its geographic applicability. After much discussion, the Task Force felt that state leadership should drive a state anti-idling policy/regulation. A motion was made by P. Carey and seconded by K. Fagan and the motion passed with only one vote against.

The Task Force agreed to table the biodiesel and ethanol recommendation for discussion as part of the PM_{2.5} SIP development process since neither fuel has a proven VOC emission reduction benefit and the data regarding NO_x reductions has not been validated by USEPA.

The Task Force also clarified its recommendation for trip reduction programs that they are a voluntary measure for reducing air pollution. The Task Force did articulate the need for a more visible marketing campaign regarding trip reductions. Some suggestions included more staffing to meet with local businesses to market all type of trip reduction programs.

In regards to transportation funding priorities, the Task Force agreed that the items included on the agenda: bus replacements, traffic signal synchronizations, truck stop electrification, the replacement of ground support vehicles at Cleveland Hopkins Airport and vehicle retrofits should be considered as funding priorities for NOACA and other potential funding sources, but the Task Force requested that this priorities be presented in order of how they were ranked by votes. The Task Force also requested that all of the mobile options that were identified in the working slate of recommendations be listed, including: Transit incentives on high pollution days, improved transit waiting environments, i.e. transit centers, etc. The Task Force asked for a revised agenda that listed these transportation options in order of ranking.

The fifth agenda items included a discussion of long-term issues that have arose out of the work of the Task Force. The group felt very strongly that the regional dialogue regarding long-term air quality issues and the forum for discussion created by the Task Force was a valuable resource. The Task Force also felt that a recommendation should be presented to the NOACA Governing Board to continue this type of work program to address issues such as climate change and carbon dioxide, energy efficiency, land use planning and transportation efficiency, education and outreach regarding the current status of air quality and pollution levels, and the engagement of the business community in longer term solution to air pollution and regional economic competitiveness. Staff indicated that they are tracking long-term solutions for inclusion in a final report at the completion of the PM_{2.5} SIP development process.

Staff described the next steps of the Ozone SIP development process. Staff reported that the Director of Ohio EPA would be addressing the NOACA Governing Board on Friday, May 12, 2006, which would be followed by an informational staff briefing on the work of the Task Force. It was suggested that the Task Force Chair introduce the Director and that the Work Group chairs

assist in the briefing. Staff indicated that the agenda for the Governing Board was very full and very little time would be allocated for the staff informational briefing. Staff suggested that the Task Force plan to attend the July 14, 2006 meeting of the Governing Board when the Ozone SIP recommendations would be included on the agenda as an action item.

Staff also indicated that the mobile source emission reduction options would be presented to the NOACA Transportation Advisory Committee as an informational item in May and for potential endorsement in June.

Staff again thanked all of the Task Force Members, members of the work groups and all interested observers for their hard work and commitment to the process and requested their assistance again in September as part of the PM_{2.5} SIP development process.