

## **Point Source Work Group Meeting Summary October 17, 2005**

The Point Source Work Group met for the third time on October 17, 2005, from 1:30 – 3:30 PM at NOACA's offices.

The Work Group reviewed one change to the data compiled by the Ohio EPA – Northeast District Office for point sources within Ashtabula, Geauga, Lake, Lorain, Medina, Portage, and Summit counties, that being the NO<sub>x</sub> emissions reported by Reliant Energy's Avon Lake power plant in 2004. The figure should read "5,804 tons per year" rather than "15,804 tons per year."

The improvement at Avon Lake from the preceding years was attributed to low-NO<sub>x</sub> burners (LNB) that were installed as a part of one boiler. They operate whenever the boiler is operating, not just seasonally. The emission reductions from the LNBs will be year round from 2004 forward. The Avon Lake power plant also has a demonstration project using a high-temperature urea-based selective non-catalytic reduction (SNCR) system that was used on Unit 9 during the 2005 ozone season. An application has been submitted to Ohio EPA to allow continued use of the SNCR on Unit 9 and to install the system on Unit 7. The SNCRs would then be used at the discretion of Reliant Energy, primarily during the ozone season. The Avon Lake power plant Unit 9 has LNBs and overfire air (OFA). These were installed in June 2004 and have been in use since installation.

The SNCRs are generally used at Avon Lake during the ozone season for NO<sub>x</sub> reduction. Some of the parameters that are considered by Reliant Energy for the use of the SNCR are: the load demand of the unit, the unit's operating condition, the price and availability of urea (or ammonia), the price of NO<sub>x</sub> allowances, the status of the SNCR equipment, the status of support equipment at the facility, and other factors.

Bill Spires of the Ohio EPA attended by telephone, as did Michael Born, Esq., of Shumaker, Loop & Kendrick. Mr. Born presented the results of the Ohio Electrical Utility Institute (OEUI) study on high ozone days in Northeast Ohio in 2002. Ozone was found to have transported to the nonattainment area from just outside the nonattainment area, as well as from Detroit, Michigan, Pittsburgh, Pennsylvania, the rest of the state of Ohio, states to the south of Ohio, and even Canada. The percentage of transport was significant in the OEUI study and greater than that estimated by US EPA. The source apportionment data indicated heavy contribution on the high ozone days from on-road mobile sources and non-road mobile sources, with less contribution from elevated point sources.

Mr. Spires presented two source apportionment charts for parts of Northeast Ohio, not including Cuyahoga County. For counties in the eastern half of the nonattainment area, on-road mobile sources appeared to have contributed heavily to high ozone days in the summer of 2002.

Mr. Spires provided a document entitled "Development of Growth and Control Factors for the Lake Michigan Air Directors' Consortium (LADCO)," which the Work Group will study for its next meeting. The Work Group continued to express concern over the parameters and the

**Point Source Work Group Meeting Summary  
October 17, 2005**

emissions inventory being used for modeling. Mr. Spires informed the group that existing and planned improvements at electric generating units (EGUs) could be factored in to the model being used by LADCO.

Mr. Spires presented draft text for several Ohio EPA rules that will be proposed in the coming weeks. One such rule, for Industrial/Commercial/Institutional (ICI) boilers will affect various sizes of boilers and will regulate “on the stringent side” of the LADCO recommendations for such boilers. Actual NO<sub>x</sub> emission limits were not yet available because Ohio EPA is currently matching those with available technology to ensure such limits are achievable. The boiler rule will be proposed in approximately 3 weeks.

Mr. Spires discussed the cold cleaners/degreasers rule and the auto body paint spraying rule, as they will apply to the Cincinnati and Dayton areas.

For each of the rules mentioned by Ohio EPA, the Work Group asked whether they would be applicable statewide. When informed that such rules would initially affect only nonattainment areas, the Work Group discussed the benefits and detriments of statewide rules for control measures. Factors such as ozone transport and economic equity were considered.

The Greater Cleveland Partnership suggested the idea that an emissions trading “bank” be established, whether for Northeast Ohio or for the entire state, to enable businesses needing offsets to be able to find them. The advantages discussed were that such a bank would create greater clarity for business and enable new businesses or expanding businesses to find offsets of their emissions. Mr. Spires noted that such a “bank” would also make it clear where the Director of Ohio EPA might look to forcibly retire credits, if such a measure were needed to bring the area into attainment.

There was insufficient time to discuss either voluntary measures or energy efficiency.

The next meeting date was set for November 15, 2005, at 1:30 p.m., at NOACA’s offices.