

MARAMA

Mid-Atlantic
Regional Air
Management
Association, Inc.



Allegheny County Health Dept., Air Quality Program, Pittsburgh, PA.
District of Columbia Dept. of the Environment, Air Quality Division
Delaware Dept. of Natural Resources & Environmental Control, Air Quality Mgmt. Section
Maryland Dept. of the Environment, Air & Radiation Management Admin.
New Jersey Dept. of Environmental Protection, Division of Air Quality
North Carolina Dept. of Environment & Natural Resources, Division of Air Quality
Philadelphia Dept. of Public Health, Air Management Services
Pennsylvania Dept. of Environmental Protection, Bureau of Air Quality
Virginia Dept. of Environmental Quality, Air Division
West Virginia Dept. of Environmental Protection, Division of Air Quality

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SUMMARY OF AND RESPONSE TO STAKEHOLDER COMMENTS ON MARAMA 2011/2018/2028 ALPHA2 INVENTORY January 26, 2016

A webinar to introduce the MARAMA 2011/2018/2028 inventory was held on December 1, 2015. Twenty six stakeholders attended (listed in Attachment 1 to this document) A follow-up email with additional information was circulated as follows:

The inventory base year is 2011 with projections to 2018 and 2028. The 2028 projection is currently in draft final form. After responding to comments received as a result of this outreach we will finalize the inventory and process it for air quality modeling. We expect to perform air quality modeling for use in visibility SIP planning with that inventory. Details of that inventory are provided on the following webpage:

2011/2018/2028 Alpha2 – Documentation and summaries

<http://marama.org/technical-center/emissions-inventory/2011-inventory-and-projections>

Further information is provided about our approach to estimate and project Electric Generating Unit (EGU) emissions on the following webpage:

ERTAC EGU – Documentation, input, output and summaries

<http://www.marama.org/2013-ertac-egu-forecasting-tool-documentation>

In addition, we introduced a spreadsheet with information concerning the status of control at the 167 Electric Generating Units (EGU) that were targeted by the MANE VU “Ask”. MANE VU has asked for 90% or greater reduction of SO₂ emissions from these sources by 2018. That spreadsheet can be downloaded from the following link:

<https://marama.sharefile.com/d-sc3c8c33ceb74107b>

Please provide Your feedback on:

- Alpha2 Inventory Methodology
- Alpha2 Source details
- 167 EGU source information: controls, shutdowns, etc

Your feedback by January 6th at the following email:

- marama@marama.org

As a result of this outreach effort, MARAMA received one comment from John Shimshock of NRG Energy. He reviewed Electric Generating Units owned by NRG in Illinois, Ohio and Pennsylvania and provided unit level comments on changes, including new controls and expected shutdowns. In addition, he noted that many sources will be required to comply with RACT rules in Pennsylvania. The RACT rules are set to be finalized in the first quarter of 2016, with compliance no later than January 1, 2017 (with some provisions for a three year extension).

Pennsylvania RACT rules

Comments on the RACT rules were provided to Pennsylvania state staff for their guidance. In response, MARAMA received a list of unit level inventory changes to point source NOX emissions that will occur as of January 2017 as a result of the PA RACT rule. These changes will be incorporated into the MARAMA Beta Inventory.

Electric Generation Units (EGU)

EGU sources are grown using the ERTAC EGU process, which is an inter-regional project. The comments on these sources were forwarded to Wendy Jacobs (CT) who processes unit level input files for the ERTAC EGU tool runs. The comments were also forwarded to the Midwest regional ERTAC leadership, Mark Janssen (LADCO), Bob Lopez (Wisconsin), and Tom Shanley (Michigan). To formally incorporate these comments into the ERTAC input files, an outreach process was initiated with states. Based on state feedback, changes will be made to the input files to incorporate these changes. ERTAC EGU Tool runs based on these changes will be made and incorporated into the MARAMA Beta Inventory.

Attachment 1

Attendees at the Stakeholder Outreach Webinar:

Tim Allen, Fish and Wildlife
Robert Bessette, CIBO
Robert Bielawa, New York DEC
Andrew Bodnarik, OTC
Pat Brewer, National Park Service
Vincent Brisini, Olympus Power
Tom Downs, Maine DEP
David Foerter, OTC
Karen Gee, Pennsylvania DEP
Wendy Jacobs, Connecticut
Joseph Jakuta, OTC
Felice Janelle, New Hampshire
Bennet Leon, Vermont
Anne McWilliams, USEPA
Nathan Miller, NPCA
Georgia Murray, Outdoors
Claire ODea, U.S. Forest Service
Stella Oluwaseun-Apo, New Jersey
Bryan Oshinski, Pennsylvania DEP
Ralph Perron, U.S. Forest Service
Surya Ramaswamy, ERM
Chelsea Ritchie, Kellen Company
Holly Salazer, National Park Service
John Shimshock, NRG
Cathy Waxman, National Grid
karen slattery, Rhode Island
Mike Kiss, Virginia
Julie McDill, MARAMA
William V. Slade, Con Ed