

**DEPARTMENT OF ENERGY
CLEAN AIR WORK GROUP (CAWG)**

Conference Call Minutes

DATE: January 6, 2011
TIME: 2:00 to 3:30 PM EST
CALL-IN NUMBER: (303) 248-0285 | Access Code: 5863657
PLACE: DOE/FORS- Room 6B-104
CHAIR: Larry Stirling, Office of Environmental Policy and Assistance, HS-22

Welcome and Introduction – Larry Stirling

Updates

I. Global Climate Change

A. Executive Order 13514 and PPTRS Reporting– Josh Silverman

All of the annual reporting and the Site Sustainability Plans (SSPs) were due on or before Dec. 31. The E.O. compliance focus has now shifted to preparing the DOE-wide greenhouse gas (GHG) inventory report which is due at the end of January. Headquarters (HQ) staff and contractors have been reviewing the submitted data and comparing emissions from 2008 and 2010. The 2008 baseline data are also being reviewed, especially in light of refined and improved methods of capturing Scope 1 Fugitive and all Scope 3 emissions. HQ is also beginning to review the SSPs and will eventually use all of the compiled information to update the DOE Strategic Sustainability Performance Plan.

There appears to be a large decrease in the Scope 1 Fugitives inventory due primarily to sites achieving reductions in their SF₆ emissions. There is also an increase in HFC/PFC emissions that may be due to improved record keeping and reporting methods. Additional details regarding the 2010 reported fugitive emissions will be presented during the next Fugitive Emissions Working Group (FEWG) meeting Thursday, January 13 at 11am EST. An additional meeting is scheduled for February 10. If you wish to be added to the FEWG email distribution list, please contact Josh Silverman at josh.silverman@hq.doe.gov. Everybody's engagement and patience during this process has been greatly appreciated. HQ is working to make as much of this information as possible available back to the sites, especially those GHG categories where GHG emissions were calculated from raw data for which sites may not have had access.

Q: Will DOE be breaking out the Federal employee business travel (ground and air) by site so that the sites can have this information available? Some of the sites were unable to include Federal employee ground business travel in the PPTRS-reported data because the Federal travel agent could not break it down by site.

A: All Federal employee air travel came from GSA as one lump of data and it is not yet clear if/how the information can be segregated. We were previously unaware of the issue reporting Federal employee ground business travel and had expected that each site would already have the Federal vs. contractor breakdown available. The NNSA Service Center reported business ground travel for all NNSA Federal employees, regardless of site.

Department of Energy Clean Air Work Group Conference Call Agenda

B. Federal Mandatory Reporting Rule e-GGRT & Registration Update – Andrew D. Shroads

The e-GGRT system is available and open for registration. The online registration takes about 10 minutes. EPA is processing the electronic signature agreement in about five business days. Andrew recommends registering soon to make sure you have plenty of time to prepare the first report (due March 31). Each reporting entity must have one Designated Representative (DR), who controls access to the site's data. Other registered users can access the data and submit reports. The regulation is very flexible regarding who can be the DR, and Andrew suggests naming the same person who is already responsible for EPA reporting requirements; all other parties interested in having a part of the GHG reporting can still register with e-GGRT and be able to access the data and submit reports.

Note that EPA made changes to the Mandatory Reporting Rule in December. There will be additional tweaks to the reporting protocol over the next few years as the rule is implemented. To view federal register notices in the context of the Mandatory Reporting Rule, use the link to eCFR available on the CAWG Air website. The eCFR incorporates federal register notices into this and other rules (<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/index.tpl>).

Q: If the Mandatory Reporting Rule is not applicable to our site, should we go ahead and register with e-GGRT or wait?

A: Andrew recommends not waiting to register. This registration also applies to other web-based EPA reporting including the Toxic Release Inventory.

Q: Can you remind us about the EPA reporting protocol?

A: There are 4 tiers of reporting, but only three could apply to DOE. All six of the Kyoto gases/gas categories (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆) are to be reported.

- Tier 1: If your type of process is included on the list, you must report all GHG emissions
- Tier 2: If you have the equipment on the list and your emissions are >25,000 tons CO₂e, you must report all GHG emissions
- Tier 3: Just applies to boilers: if your boiler is rated at >30,000 Btu max input/hour and emissions >25,000 tons CO₂e, you must report all GHG emissions

Q: Will EPA provide any training on how to do the GHG inventory, similar to the e-GGRT training?

A: Such training is not likely. All the old training sessions are archived on the training website (<http://www.epa.gov/climatechange/emissions/training.html>). In the future, EPA may offer trainings on how to submit information in e-GGRT, but probably not before the March reports are due.

II. Air Quality Regulations

A. National Emissions Standards for Hazardous Air Pollutants (NESHAP) – ADS

1. Reciprocating Internal Combustion Engine – Emergency Response Demand

Emergency RICE are generally exempt from the emissions limits, testing, and control requirements, and according to the current version of the NESHAP, Emergency RICE can be used for up to 15 hours per year as “Emergency Demand Response – EDR.” Several groups, including many DOE sites, have expressed concern over the 15 hour limit, so EPA has re-opened that section of the NESHAP for comment. There does not appear to be any technical basis for the

Department of Energy Clean Air Work Group Conference Call Agenda

decision to limit EDR usage to 15 hours. Argonne's EDR contract, for example, says that they will be available to generate their own electricity for 80-100 hours/year to help the local utilities avoid black/brownouts.

An ad-hoc subcommittee of the CAWG is being formed to develop a technical DOE position paper for submittal to EPA staff regarding EDR at DOE sites. The teleconference to develop a **framework for the comments is scheduled for Monday, January 10, 1-2pm EST**. If you will be participating, please have the following information available if possible:

- If you participate in an EDR (or generate electrical power at the request of the local electricity utility), please note the energy and time requirements of the program (e.g. megawatts of generation, maximum operating hours/year)
- Generator capacity and hourly emissions estimates for generators (from air emissions testing, WebFIRE or AP-42 calculations)

2. Boiler & Process Heater

EPA is delaying finalization of this rule for at least a year, based on the comments received. Rule implementation may be delayed even longer, as lawsuits will most likely be filed on this NESHAP. The extra time is needed by EPA as this NESHAP will apply to more sources than any other regulation in the history of EPA. Theoretically, the rule applies to every boiler/heater, including those in homes, shopping centers, fire stations, etc. Additionally, states have concerns with implementing such a broad reaching rule without extra resources.

B. Final Fine Particulate Matter (PM_{2.5}) Test Methods – ADS

EPA has revised the methods for testing for fine particulates (PM_{2.5}) to require reporting of condensable PM. For sites that conduct particulate air emissions testing, especially U.S. EPA Method 5, discuss the requirements for future air emissions testing with your air permitting authority.

C. National Ambient Air Quality Standards (NAAQS) for Ozone – ADS

EPA is delaying completion of this standard as it asks the Clean Air Science Advisory Committee (CASAC) how they arrived at their recommendation for an ozone standard. Previous ozone standards have been difficult to attain, (some areas are still non-attainment of the 1997 standard of 80 ppb). The 2008 standard of 75 ppb is being reviewed. CASAC initially had recommended a range of 60 ppb to 70 ppb. The lower the standard, the more non-attainment areas and the harder it will be for non-attainment areas to attain the standard.

D. Fall Regulatory Agenda – ADS

The full EPA Fall Regulatory Agenda will be emailed soon. Please take a few moments to review the Agenda and let Larry and/or Andrew know which regulations are important to your site. A few items may be of interest:

- EPA to review PM_{2.5} NAAQS
- EPA to review the secondary (welfare-based) NO_x and SO₂ standards
- EPA to review NESHAP Subpart W: Standards for Radon Emissions From Operating Uranium Mill Tailings
- Revise MACT malfunction reporting

**Department of Energy
Clean Air Work Group
Conference Call Agenda**

E. Ozone Depleting Substances (ODS)

1. Section 608 Modification – ADS

EPA is proposing various changes concerning leaking ODS-containing equipment. The main impact is a lower leak threshold to trigger repair and increased record keeping and verification requirements.

2. ODS Disposition – ADS

The DOE ODS Technical Assistance Tool is being revised again to reflect ODS disposition. The Tool currently requires the use of a website (DOE Material Exchange) that no longer exists. Questions that may be under consideration while revising the Tool are:

- Are there still critical needs in the DOE complex that require a stockpile?
- If not, is it time to require switching to an alternative material?

Note that all ODSs will be phased out by 2030.

III. DOE Sites

A. Air Web Site – Andrew Shroads/Larry Stirling

The URL for all things air related, including the CAWG is:

<http://homer.ornl.gov/nuclearsafety/env/air/>. Please look around on the site and provide feedback on what looks helpful or not helpful, what resources you would like to see here, and what improvements can be made. For example, this could maybe be a place to post availability information regarding ODSs. Please provide feedback on the utility of having CAWG minutes, agenda and presentation materials available online.

Old Business

I. Air Pollution Training Update – Larry Stirling/Andrew Shroads

There is nothing new to report at this time.

New Business

I. In response to the 15 hour EDR limit in the RICE NESHAP

A teleconference to develop the framework for the DOE comments to EPA is scheduled for Monday, January 10 from 1-2pm EST. If you will be participating, please have the following information available if possible:

- If you participate in an EDR (or generate electrical power at the request of the local electricity utility) please note the energy and time requirements of the program (e.g. megawatts of generation, maximum operating hours/year)
- Generator capacity and hourly emissions estimates for generators (from air emissions testing, WebFIRE or AP-42 calculations)

II. Concerning the schedule of future CAWG meetings

It was decided to switch the bi-monthly CAWG meetings from the odd-numbered months to the even-numbered months to better make use of the information presented at the DoD Clean Air Act Steering Services Committee meetings. The next meeting will take place the 1st Thursday of February, followed by the 1st Thursday in April, and so on. The February meeting will include a

**Department of Energy
Clean Air Work Group
Conference Call Agenda**

short update of events and a discussion of the GHG Title V New Source Permitting Standards (slides distributed January 5, 2011 and will be redistributed in advance of the call).

Next Meeting

February 3, 2:00 PM to 3:30 PM Eastern Time. The call-in number and agenda will be emailed soon.